BUILDING
A BETTER FUTURE

Consultation Statement Part 2

(Regulation 19 & 20)

November 2026



Havant
BOROUGH COUNCIL

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1. Introduction

1.1. The purpose of this document is to explain how Havant Borough Council (HBC) has consulted on the preparation of the new Local Plan – the Building a Better Future Plan (BBFP). It sets out how the Council has involved residents and key stakeholders in preparing the Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)[1]. It also shows how consultation has taken place in line with the Council's Statement of Community Involvement (SCI)[2], which sets out how the Council will consult and involve the public and statutory consultees in planning matters.

1.2. This Consultation Statement has been prepared in accordance with Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Local Plan. Regulation 22 relates to the submission of documents and information to the Secretary of State, with part (c) requiring a statement setting out the following:

(i) which bodies and persons the local planning authority invited to make representations under regulation 18,

(ii) how those bodies and persons were invited to make representations under regulation 18,

(iii) a summary of the main issues raised by the representations made pursuant to regulation 18,

(iv) how any representations made pursuant to regulation 18 have been taken into account;

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and

(vi) if no representations were made in regulation 20, that no such representations were made;

1.3. The Consultation Statement – Part 1 (Regulation 18) (June 2026) addresses parts i to iv of Regulation 22. This Consultation Statement – Part 2 (Regulation 19 & 20) (November 2026) has been produced to support the submission of the Local Plan for examination and specifically addresses parts v and vi.

1.4. This Consultation Statement – Part 2 starts with an overview of the preparation of the Local Plan and summarises the Regulation 19 consultation that has taken place. The statement then sets out an overview of the consultation undertaken at Regulation 19 in Section 2, before providing a summary of the main issues raised under Regulation 20 and the Council's response at Section 3.

[1] https://www.legislation.gov.uk/uksi/2012/767/contents
[2] https://www.havant.gov.uk/planning-services/planning-policy/statement-community-involvement-sci

2. Local Plan Regulation 19 Consultation overview

Consultation on the 2026 Publication Plan

2.1. The Publication Building a Better Future Plan and its consultation under Regulation 19 were approved by the Council's Cabinet on 1 July 2026[3] and the Full Council on 15 July 2026[4]. As part of this governance process, the Cabinet, on 1 July 2026, specifically approved the consultation and the Consultation Plan (Appendix B of that decision).

2.2. The Regulation 19 consultation for the Publication Local Plan commenced on Monday 20th July 2026 and finished at 5pm on Wednesday 9th September 2026. There was a need to consult over the summer period due to the need to submit the Plan prior to the end of 2026. The consultation period was therefore extended from the minimum regulatory requirement of six weeks to 7 weeks and 2 days. The Plan presented was an evolution of the full draft (Regulation 18) Local Plan which was subject to public consultation in 2025.

Methods of Communication

2.3. The Publication Building a Better Future Plan consultation was supported by the Council's Public Relations Team. The communications activities reflected the formal nature of this stage of consultation before the Plan is submitted for examination, and the fact that respondents would need to shape their feedback around the relevant legal requirements, and the soundness of the Publication Plan. The Council prepared a guidance note explaining these key terms and how they could submit their representations.

2.4. Promotion was undertaken using both online and offline methods as follows:

- Advance Mailout - In advance the Full Council meeting on 15 July 2026, there was a mailout via the Local Plan GovDelivery database and update published on the website at www.havant.gov.uk/localplan to notify stakeholders that the Publication Plan would be considered at this meeting. This highlighted that seating was limited and would be on a first come first served basis and directed members of the public to view the livestream.
- Statutory notices – a Statement of Representation Procedure was displayed in the Atrium at the Public Service Plaza and published online www.havant.gov.uk/localplan during the consultation period.
- Press release - the Council published a press release at the start of the consultation period.
- Consultation Mailout – a mailout alerted those on the GovDelivery database to the opportunity to engage with the consultation.
- The Local Plan webpage ((www.havant.gov.uk/localplan) used as a central resource

Statutory Notices

2.5. During the consultation period, a formal statutory notice known as the 'Statement of Representations Procedure' and 'Statement of Fact' which set out how and where

[3] https://havant.moderngov.co.uk/ieListDocuments.aspx?CId=128&MId=13433&Ver=4
[4] https://havant.moderngov.co.uk/ieListDocuments.aspx?CId=126&MId=13392&Ver=4

stakeholders could submit representations, and where documents could be seen was displayed in the Atrium at the Public Service Plaza and published on the HBC website (www.havant.gov.uk/localplan)[5].

2.6. The statement confirmed that copies of the Publication Building a Better Future Plan, together with the Sustainability Appraisal, Habitat Regulations Assessment, Policies Map and Consultation Statement and other supporting documents were available to view on the Council's website, and at the Public Service Plaza from 9:00am to 5:00pm, Monday to Friday excluding bank holidays. The Statement also indicated how and where representations could be submitted.

Who was consulted?

2.7. The list of bodies and persons invited to make representations at the Regulation 19 stage was the same as that provided at Section 3 of the Consultation Statement – Part 1 (June 2026). At this stage, the newly formed Hampshire and the Solent Combined County Authority[6] was consulted as a relevant authority whose area is in the local planning authority's area.

2.8. The Council holds a mailing list of interested parties who have opted in to receive updates on the Local Plan via a link on the Council's website[7], which includes, but is not limited to, residents and community groups, developers, agents, organisations and residents. Contacts on this mailing list were directly notified of the consultations. The Council also received representations from other consultation bodies that were not directly notified.

Consultation methods

2.9. The Publication stage of the Plan allows representations to be made before the Plan is submitted for examination. As the purpose of the examination is to consider whether the Plan complies with the relevant legal requirements, and is sound, the Government's model representation form and guidance note for use at Plan publication stage were used to guide respondents to shape their feedback using these criteria. Consultation and promotional materials referenced the previous rounds of consultation (held in 2022 and 2025) to ensure respondents were aware of the previous opportunities to shape their feedback using these criteria.

2.10. The consultation was undertaken via the following methods:

- **Council Website and Go Vocal –** The Council made available the Publication Local Plan, together with an interactive policies map, and the associated evidence base on the Planning Pages of its website. In addition, the corporate online digital engagement platform (previously known as Citizenlab) was used as a visual resource for the project on the main Local Plan webpage. Pages were designed to provide a dynamic overview of the Plan, with their main function to give interested parties an overview of key policies and proposed allocated sites, with links to further information and the online survey signposted throughout.

- **Online representation form** – The main method of feedback was an online representation form. This form was designed using the Model Representation Form[8]

[5] In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

[6] Following its formal establishment on 4 June 2026.

[7] https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-overview

[8] Model representation guidance for local plans being examined in the legacy system (The Town and Country Planning (Local Planning) (England) Regulations 2012) - GOV.UK

provided by Government. This form was designed to be as easy to understand and accessible as possible, whilst balancing the need to ensure respondents were guided to provide informed responses in the correct format.

The online form included a function for participants to save their progress and continue later in order to allow respondents time to formulate their response. The online representation form included links to the Council's guidance note which explained what is meant by soundness and legal compliance. The online form together with the guidance note was available on the Council's main Local Plan webpage.

- **Paper representation forms –** Paper forms, which mirrored the online form, were made available for collection from the Plaza and on request (details of how to request a paper form were promoted online and offline).

  The form captured personal information (including the name, address and contact details of the respondent) to be admissible and to be sent to the Planning Inspectorate. It also made clear the Council's GDPR duties.

  A copy of the form is at Appendix 1.

- **Stakeholder feedback –** Whilst stakeholders were encouraged to use the representation form to submit their comments as the primary means of engagement with the consultation, the Council also received a number of letters and email representations to the consultation.

2.11. The Council made available a telephone number and email address for respondents to seek support in completing their form from Planning Policy officers via telephone and email.

Representations received

2.12. A total of 454 individual respondents made a total of 610 representations, using a mixture of online forms, paper forms, emails and letters.

2.13. A summary of main issues raised and how the representations were taken into account are outlined in Chapter 3 of this report.

2.14. Two of the representations were received past the deadline but have nevertheless been reported in this summary.

'Call for Sites' Engagement

2.15. There have been several 'calls for sites' where landowners and developers were invited to submit or promote sites for consideration. However, given the high level of housing need in Havant Borough and the limited availability of sites, the 'call for sites' remains continually open, and continued to be publicised on the Council's website during the Regulation 19 consultation.

3. Summary of main issues raised under Regulation 20 and how representations were considered

3.1. The responses received covered a broad range of policies and allocations in the Publication Plan, as well as the evidence base and matters of national policy. Most matters, policies and allocations attracted numbers of comments in single or low double figures. This is with the exception of questions around meeting development needs and associated questions around the plan strategy; questions about infrastructure impacts of development and three allocations in the plan (Allocations 1, 2 and 3).

3.2. Allocation 3: Land south of Havant Road (Horse's Field), in many cases combined with Policy 30: Nationally Protected Landscapes, in particular, attracted large volumes of responses, with 350 representations (57% of the representations received) relating to these topics.

3.3. A summary of the main issues raised in the representations relating to the Publication Building a Better Future Plan under Regulation 20 is set out below. This includes the Council's response to the main issues to aid the Inspector(s) in examining the Local Plan.

3.4. This summary of the main issues below is accompanied by three appendices:

- Appendix 2 contains a table summarising all the representations received, organised in line with the structure of the Publication Local Plan
- Appendix 3 provides summaries of the representations from the statutory bodies and sets out the level of agreement reached
- Appendix 4 sets out the representations received on the site allocations from site promoters (landowners, developers and their agents). This also covers sites that have not been allocated in the plan ('omission sites').

3.5. Copies of all the representations received under Regulation 20 are submitted for examination.

Main Issue 1

Development Strategy

Summary of Issues Raised

Both support for and objections to the Development Strategy were received.

Strong expressions of support came from residents on Hayling Island, as well as the Environment Agency. All consider that the approach the plan takes to limit future development on Hayling Island based on flood risk and climate change considerations is a strength of the plan. Residents also mention that this addresses their concerns about infrastructure, in particular transport capacity and connectivity on the island.

By contrast, objections were received from site promoters – two of land on Hayling Island, one on the Mainland. These representors do not consider that limits should be placed on future development on Hayling Island. They consider that flood risk does not provide sufficient reason for doing this in the context of unmet housing need. They also highlight that the strategy takes differing approaches to greenfield sites versus sites within in settlement boundaries.

More generally, objectors note that the preferred strategy only delivers half identified housing needs, while alternative growth strategies deliver higher housing provision. They consider that the Council has failed to demonstrate that its preferred strategy represents the most appropriate strategy when assessed against reasonable alternatives.

Other aspects of development strategy did not attract significant commentary.

Havant Borough Council Response

The Council has set out its reasons for the Development Strategy in the Local Plan, the SA and the Development Strategy Topic Paper.

SP003-C Sustainability Appraisal (SA) of the Regulation 19 Draft Local Plan and Appendices A & F
SP003-D Appendix B - Sites included in each strategy option
SP003-E Appendix C - Full sustainability appraisal of topic policies
SP003-F Appendix D - Full sustainability appraisal of sites
SP003-G Appendix E – Summary of negative effects at sites and proposed mitigation
TP001 - Development Strategy Topic Paper

Main Issue 2

Meeting Housing Need

Summary of Issues Raised

Comments in relation to unmet housing were made predominantly by other local planning authorities and site promoters. Key points include:

- Concern about significant housing shortfall; the plan period starting in 2022, rather than 2025/26.
- Test Valley Borough Council note that it is not considered appropriate for unmet needs from Havant to be met in Test Valley.
- Gosport Borough Council recognises the constraints within Havant Borough that affect meeting housing need and supports the approach HBC has taken.
- East Hampshire District Council (EHDC) raise concern about the significant level of unmet housing need - EHDC is clear that it is not in a position to accommodate the full extent of that unmet need. HBC has sought to maximise housing delivery within the constraints of its administrative area.
- East Hampshire Council note that the presentation of the housing requirement, supply position and resulting unmet need could be clearer
- Portsmouth City Council has taken a similar approach to identifying its own housing target. Both authorities have left no stone unturned in robustly identifying all sources of housing land supply.
- There is no evidence to demonstrate that the Council has applied the minimum density standards for the allocations.
- Site promotors note the shortfall and consider that this underlines the importance of retaining housing allocations put forward in the plan and considering additional sites

Havant Borough Council Response

Havant Borough Council has a high housing need, as explained in the Housing Supply Topic Paper, which includes a high need for affordable housing as set out in the Affordable Housing Topic Paper. There is also a growing older population, which accounts for a greater share of the overall population, as set out in the Addendum to Housing Needs Analysis (June, 2026), that needs to be accounted for in planning for housing.

It is also acknowledged that the Government set out the need to deliver 1.5 million new homes during 2024-2029 and the National Planning Policy Framework has been recently updated to facilitate the increased delivery of housing alongside other past interventions, such as the introduction of an updated method for calculating a local planning authority's objectively assessed housing need.

Therefore, extensive effort has been undertaken to find housing land in the Borough. In line with the proposed Development Strategy, brownfield land has been prioritised. However, due to a very constrained nature of the Borough (as set out in the Havant Borough Constraints Study for Havant Borough Council, August 2024), this in itself would not provide sufficient housing land supply. Therefore, greenfield site allocations are proposed to increase the supply of housing. Unfortunately, including greenfield sites still does not meet the Council's housing requirement. Under a duty to co-operate, an ongoing engagement is being undertaken with local planning authorities considered to be within the same local market area to seek support in providing housing sites. However, due to local constraints and high numbers of objectively assessed

housing need, with the exception of Winchester City Council, none of the local planning authorities is in a position to allocated housing numbers in their area towards Havant's housing supply. Winchester City Council's Local Plan only allocates 345 dwellings towards Havant's housing supply, which still leaves a considerable shortfall of housing.

In order to ensure that all options and alternatives for finding housing sites have been assessed, and for the Plan to be prepared positively, further work has been carried out which included the review of previously discounted sites.

Main Issue 3

Allocation 1: Southleigh and its infrastructure impacts and requirements

Summary of Issues Raised

There are a large number of objections to the allocation and concerns regarding infrastructure in relation to the allocation. Comments broadly cover but are not limited to the following:

- Site promoter supports the allocation
- Support in principle for the Southwest Bridge Link for the site
- Concern over deliverability of the bridge and the site overall
- Support for a comprehensive masterplan-led approach to the delivery of Southleigh
- Concerns in relation to healthcare infrastructure
- Site does not contribute to the five-year housing land supply
- Concerns over the transport assessment for the site
- The allocation does not reference the setting of the national parks
- To make the plan sound the allocation should either be removed or substantially reduced
- Concerns around the number of homes and the pressure it would cause on existing infrastructure like healthcare, community and transport
- Minor amendments have also been proposed on the site description, key features, and developer requirements

NB Linked to the Southleigh Allocation, comments were also raised in relation the Allocation 6 and Policy 4: Infrastructure and Environmental Mitigation to Support Development. These policies cross-refer the Allocation 1 and safeguard land for a bridge over the railway line to the South West of the Southleigh Allocation, as part of the access arrangements for Southleigh. Concerns have been raised about the interaction between these policies, and the deliverability of this link.

Havant Borough Council Response

The Council's site selection methodology takes account of the key requirements identified in the 2024 National Planning Policy Framework and the National Planning Practice Guidance and will be set out in the forthcoming Housing Site Allocations Topic Paper.

Site specific assessments were undertaken through the HS05 Strategic Housing and Economic Land Availability Assessment and the RA2 Sustainability Appraisal of the Regulation 19 Draft Local Plan which accompany the Plan.

Many of the detailed matters raised in representations are identified as key features and are reflected in the allocation requirements accordingly. The Council will review consider whether any proposed modifications are necessary in light of the matters raised through representations.

Main Issue 4

Allocation 2: Long Copse Lane

Summary of Issues Raised

There are a large number of objections to the allocation, broadly covering (but not limited to):

- Site promoter supports the allocation
- Certainty of the allocation providing sustainable transport connections to Emsworth;
- The unsuitability of Long Copse Lane to accommodate additional traffic and related highway safety concerns;
- Development and associated traffic would erode the rural character and recreational amenity of Long Copse Lane;
- Harm to the open countryside, rural character and setting of the South Downs National Park, and that the allocation is inconsistent with the Council's Landscape Study;
- Concern about wastewater capacity at Thornham Wastewater Treatment Works and that sewage and chemical pollution would be worsened
- Concern that the site is remote from services and facilities and has limited accessibility;
- Loss of wildlife habitat and local biodiversity;
- Concern that the impact on Bechstein bats and their habitat;
- That there is no nutrient neutrality mitigation scheme has been identified to mitigate development in the Western Streams catchment;
- Concern that the site would not be delivered within the plan period;
- Suitability of the site due to flood risk and existing drainage issues.

Havant Borough Council Response

The Council has a very high level of housing need, which means that it has to leave no stone unturned to meet as much housing need as possible. The site is needed to address the overall housing need in Havant Borough and is therefore retained as an allocation in the Plan.

The Council's site selection methodology takes account of the key requirements identified in the 2024 National Planning Policy Framework and the National Planning Practice Guidance and will be set out in the forthcoming Housing Site Allocations Topic Paper.

Site specific assessments were undertaken through the HS05 Strategic Housing and Economic Land Availability Assessment and the RA2 Sustainability Appraisal of the Regulation 19 Draft Local Plan which accompany the Plan.

Many of the detailed matters raised in representations are identified as Key Features and are reflected in the allocation requirements accordingly. The Council will review and consider whether any proposed modifications are necessary in light of the matters raised through representations.

Main Issue 5

Allocation 3: Land south of Havant Road (Horse's Field)

and Policy 30: Nationally Protected Landscapes

[these are presented together here, as they are interlinked and most representors commented on both at the same time]

Summary of Issues Raised

A very high number of representations related to Allocation 3 and Policy 30, which are closely related, have been received. Key concerns raised include:

- Allocation conflicts with the development strategy and other policies in the plan
- Traffic and highway impacts, including concerns over existing traffic situation as well as increased traffic resulting from the allocation; poor conditions of roads, traffic noise; concerns over adequacy of the Transport Assessment.
- Impact on infrastructure, pointing towards insufficiency of existing infrastructure (GP surgeries, schools, roads, parking, community facilities, etc.).
- Harm to the National Landscape, landscape setting.
- Loss of a clear settlement boundary, loss of strategic gap.
- Impacts on ecology (including SINC, Harbours SPA /SAC, Solent Brent Goose and Wader Sites), as a result of the loss of green space as well as construction and occupation phase of the development and a general wildlife.
- Loss of green space and rural character, with a focus on loss of green space for recreation, affecting human health and well-being, but also a loss of agricultural land affecting food security
- Conflict with the Emsworth Neighbourhood Plan, in particular policies relevant to development in Emsworth and National Landscape.
- Flood Risk and drainage, in particular, concerns over existing inadequacy of sewer infrastructure which leads to discharges of raw sewer into the Harbour and the consequent water pollution affecting wildlife, residents and tourists.
- Conflicts with local policies protecting the Chichester Harbour and Chichester Harbour Management Plan as well as national policy and guidance, including guidance related to landscapes/National Landscapes. A vast majority of respondents raised a concern that an exceptional circumstances/public interest assessment not been undertaken.
- Against legislation which puts a duty on the LPA to further the conservation and enhancement of protected landscape.
- Setting a precedent.
- Current Policy 30 does not offer sufficient protection to National Landscape from further development.
- No justification for the allocation provided; insufficient evidence; previously found unsuitable (SHELAA); concerns over assessment of the site in the Sustainability Appraisal and Habitats Regulations Assessment. No need for housing in Emsworth; Emsworth is already overdeveloped, brownfield sites are available and should be prioritised, cumulative impacts from other developments.
- Consultation process legal flawed, allocation was included into the Plan late, which didn't allow sufficient scrutiny; references to the Full Council debate and voting on 15/07/26.
- Other impacts (heritage, archaeology, air and light pollution, climate change; environmental impacts; water supply; trees; water quality; etc.)

Havant Borough Council Response
The Council's site selection methodology takes account of the key requirements identified in the 2024 National Planning Policy Framework and the National Planning Practice Guidance and will be set out in the forthcoming Housing Site Allocations Topic Paper. Site specific assessments were undertaken through HS05 Strategic Housing and Economic Land Availability Assessment and RA2 Sustainability Appraisal of the Regulation 19 Draft Local Plan which accompany the Plan. Many of the detailed matters raised in representations are identified as key features and are reflected in the allocation requirements accordingly. The Council will consider whether any proposed modifications are necessary in light of the matters raised through representations.

Main Issue 6

Mitigation of the Impacts of Development

Summary of Issues Raised

Respondents raised concerns about the impact of development on the local area.

In some cases, this is linked to individual sites, with the larger sites (in particular allocations 1-3, summarised separately above) causing the greatest concern, and cumulative impacts of all the growth planned for through the Local Plan also being highlighted.

Respondents are most concerned about the ability of the highway network to be able to accommodate the additional growth, with social infrastructure, in particular health care infrastructure such as GPs also being a major concern. Respondents question whether infrastructure capacity exists to serve the planned growth without having a detrimental effect on the quality of life of existing residents. They acknowledge that the Local Plan includes provision for infrastructure improvements, in the form of Policy 4, 'Development Requirements' in Allocation Policies, as well as the Infrastructure Delivery Plan, but questions remain regarding the Council's ability to make developers and infrastructure providers deliver capacity enhancements.

The need to include particular items of infrastructure in the IDP is also raised.

Havant Borough Council Response

The Council is aware that infrastructure capacity is always one of the key concerns of local residents. This is true both of existing conditions, and of future capacity as a result of development and increased population density.

The Council is content that it has undertaken the relevant studies and has worked with infrastructure providers to keep them informed about the level of growth that is being planned for. Relevant evidence base includes:

IT001 Infrastructure Delivery Plan
IT002 Local Cycling and Walking Infrastructure Plan
IT003 PfSH Integrated Water Management Strategy
IT004 Thornham wastewater capacity report
IT006 Strategic Transport Assessment (STA)
SCG004 Statement of Common Ground with Portsmouth Water
SCG012 Statement of Common Ground with Southern Water
SCG013 Statement of Common Ground with National Highways
SCG014 Statement of Common Ground with Hampshire County Council

The Council will work with partner authorities and infrastructure providers when considering planning applications, in order to secure a viable and deliverable package of mitigation and contributions to infrastructure provision. The details of this cannot be pre-determined or secured at the Local Plan stage.

The Infrastructure Delivery Plan will be kept under review, in consultation with infrastructure providers and partner authorities.

Appendix 1: Regulation 19 Representation Form

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.

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About this representation form

The form has two parts:

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

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

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

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

Privacy Notice

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

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

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

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Part A - Personal Details

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

☐ I am completing this form myself

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

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

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

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

2. Please provide the following personal details.

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

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

Title	
First Name	
Last Name	
Address Line 1	
Address Line 2	

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Postcode	
Telephone Number	
Email Address	

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

Job Title	
Organisation	

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

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

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

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

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

Title	
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.

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	
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.

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.

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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.

Appendix 2: Summary of all responses received under Regulation 20

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Plan & Strategy - General	n/a	concern over impact of development on - open spaces / natural areas / biodiversity - highways - social infrastructure - construction impacts	062, 153,163, 538, 558, 107	249, 356, 343, 247, 393, 260
Plan & Strategy - General	n/a	General support for the plan as presented at Regulation 19, with particular support expressed for approach to Hayling Island	138, 172, 183, 188, 200, 210, 225, 239, 057, 257, 276, 337, 348, 375, 010, 002, 004, 137, 173, 435, 542	435, 335, 334, 332, 184, 329, 207, 014, 382, 270, 264, 312, 123, 240, 347, 339, 019, 028, 339, 310, 243
Plan & Strategy - General	1.5	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.	583	144
Plan & Strategy - General	2.42	Questions ability of the Council to resource pre-application engagement	555	393
Policy 1: Development Strategy	n/a	Supports the policy	563, 579	388, 438
Policy 1: Development Strategy	n/a	Support for Development Strategy	*NB a number of representors supported the*	
Policy 1: Development Strategy	n/a	The Environment Agency supports the development strategy	465	231
Policy 1: Development Strategy	n/a	Preferred strategy only delivers half identified housing needs, alternative growth strategies deliver higher housing provision. The Council has failed to demonstrate that its preferred strategy represents the most appropriate strategy when assessed against reasonable alternatives.	595	453
Policy 1: Development Strategy	n/a	Development Strategy in relation to Hayling island is unsound - consider that flood risk does not provide sufficient reason for limiting development on the Island in the context of unmet housing need. The strategy results in the exclusion of sustainable, available and achievable housing sites without a justifiable basis.	562, 570, 565	325, 440, 268
Policy 1: Development Strategy	n/a	Strategy takes differing / contradictory approach between greenfield sites and sites in settlement boundary on Hayling Island	570	440
Policy 1: Development Strategy	n/a	Provisions of Policy 1 do not go far enough - nature should be embedded under each heading to reflect policy and best practice	571	295
Policy 1: Development Strategy	n/a	*see also Policy 27, which overlaps significantly with the strategy*	*see Policy 27*	*see Policy 27*
Policy 1: Development Strategy	a)	Criterion should be more clearly framed around the delivery of objectively assessed needs as far as possible. Change proposed.	598	454
Policy 2: Defined Settlement Boundary	n/a	Support for policy	540, 563	243, 388
Policy 2: Defined Settlement Boundary	n/a	Policy does not stop development taking place outside of South Hayling.	546	210
Policy 2: Defined Settlement Boundary	n/a	Recommendation that development outside the settlement boundary should only be permitted where it adheres to the mitigation hierachy, uses the LNRS and offers BNG.	571	295
Policy 2: Defined Settlement Boundary	n/a	The policy is too restrictive when compared to the NPPF.	556, 595	393, 453
Policy 2: Defined Settlement Boundary	n/a	The policy is overly restrictive and fails to take account of the significant unmet need for housing. Policy should allow for windfall outside, but adjacent to the settlement boundary. Revised policy wording suggested.	565	268
Policy 2: Defined Settlement Boundary	n/a	Parts of Hayling (Fleet, Stoke, Northney and Tye) have no settlement boundary to protect against inappropriate infill and extensions of these rural settlements. The Plan could be made sound by extending the settlement boundary in these areas.	564	204
Policy 2: Defined Settlement Boundary	Figure 4	Figure 4 should identify proposed impact of development. Sites on Figure 10 are missing and therefore the figure is misleading; eg the Southleigh estate clearly expands the settlement boundary.	332	308
Policy 2: Defined Settlement Boundary	n/a	The settlement boundary should be amended to include Waterlooville Golf Club	595	453
Policy 2: Defined Settlement Boundary	n/a	Excluding allocations from the defined settlement boundary is unnecessary. Proposed change to include them.	599	454
Policy 3: Regeneration	c) & d)	Recommend that criterion c and d include reference to nature, green infrastructure, urban greening and nature based solutions by incorporating them into policy wording	571	295
Policy 3: Regeneration	n/a	Portsmouth City Council supports a collaborative approach with HBC to regeneration proposals for Leigh Park and other areas of the Borough where the Council is a major landowner.	588	252
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	Nature should be reflected in the policy as critical infrastructure that underpins sustainable development.	571	295
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	The ICB considers that the Plan does not provide a sufficiently clear, effective or deliverable policy mechanism for addressing the primary care infrastructure impacts arising from planned development. The Plan should provide a mechanism to assess that impact and secure proportionate mitigation for development-related element of need. This objection is capable of being resolved through targeted Main Modifications.	587	245
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	Concern about infrastructure capacity under existing conditions and lack of action to address this; question ability to accommodate additional growth under these circumstances; All essential infrastructure upgrades must take place before development;	095, 361	042, 035
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	Infrastructure should not be replaced unless the need has been clearly established. Where new infrastructure is needed, this should be the most environmentally sustainable option that is viable	436	310
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	Policy should include the maintenance / good condition / accessibility at all times of the Hayling Bridge	436, 542, 247	310, 243, 210
Policy 4: Infrastructure and Environmental Mitigation to Support Development	a)	Support for criterion a)	436	310
Policy 4: Infrastructure and Environmental Mitigation to Support Development	b), c), d), m) n)	The Environment Agency supports the policy	467	231
Policy 4: Infrastructure and Environmental Mitigation to Support Development	g)	Support the policy	572	164
Policy 4: Infrastructure and Environmental Mitigation to Support Development	l)	Point (l) of Draft Policy 4 safeguards land for the expansion of the Hayling Island Health Centre at Mengham. Further comments concerning Hayling Island Health Centre will be provided at a later date as agreed with the Council.	572	164
Policy 4: Infrastructure and Environmental Mitigation to Support Development	m), n), Figure 9	Portsmouth City Council welcomes the safeguarding of land at the Broadmarsh Landfill Revetment for a Flood and Coastal Erosion Risk Management Scheme. The inclusion of the Environmental Mitigation sites in Figure 9, particularly close to the City boundary and A27 boundary are welcomed.	588	252
Policy 4: Infrastructure and Environmental Mitigation to Support Development	o)	Network Rail welcomes the safeguarding in criterion o)	393	079
Policy 4: Infrastructure and Environmental Mitigation to Support Development	o)	Questions over deliverability of the bridge link	583, 429, 430, 432 and 433	144, 355

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 4: Infrastructure and Environmental Mitigation to Support Development	o)	Site promoter for Allocation 6 and HCC as LHA express concern over interaction of Allocation 6 with access arrangements for Allocation 1, including the safeguarding in Policy 4	583, 568	144, 439
Policy 4: Infrastructure and Environmental Mitigation to Support Development	o)	South Downs National Park Authority consider that Policy 4 should explicity express support for north-south green and blue connections and corridors through Allocations 1, 2 and 6; There needs to be clarify that these connections and corridors will not conflict with proposed access arrangements for Allocation 1 included in Policy 4. Wording changes suggested to criterion o).	369	239
Policy 4: Infrastructure and Environmental Mitigation to Support Development	2.93	suggested wording change from 'may' to 'will'	204	095
Policy 4: Infrastructure and Environmental Mitigation to Support Development	supporting text	The ICB welcomes Policy 4, but considered that calrificiations are required in the supporting text: Add wording substantially as follows:	587	245
Policy 4: Infrastructure and Environmental Mitigation to Support Development	n/a	Policy should distinguish between infrastructure funded through Community Infrastructure Levy (if introduced) and section 106 obligations. Change proposed.	600	454
Policy 5: Green and Blue	n/a	Support for policy	385/586	040
Policy 5: Green and Blue	n/a	Support for policy	579	438
Policy 5: Green and Blue	n/a	Want to see reference to re-wilding being encouraged	438	310
Policy 5: Green and Blue Infrastructure	n/a	The policy is welcomed however, there is no quantitative standard and without measurable requirements developers can argue compliance with minimal provision.	571	295
Policy 5: Green and Blue Infrastructure	supporting text	East Hampshire District Council support the policy approach, but note that the supporting text could recognise importance of chalk streams.	581	143
Policy 5: Green and Blue Infrastructure	n/a	Policy uses absolute language which may be impracticable on constrained and allocated sites and duplicates other policies. Proposed changes.	601	454
Policy 6: Amount of Housing	n/a	Support for Policy	259, 579	441, 438
Policy 6: Amount of Housing	n/a	Concern about significant shortfall	259	441
Policy 6: Amount of Housing	n/a	Shortfall underlines importance of retaining housing allocations put forward in the Plan	259, 526	441, 444
Policy 6: Amount of Housing	n/a	Do not consider the plan period to be sound - it starts in 2022, 4 years prior to the assessment of housing needs being undertaken. It is not consistent with national policy to include development delivery in the period prior to which development needs are assessed. It should start in the year that need is calculated, 2025/26.	565	268
Policy 6: Amount of Housing	n/a	Test Valley Borough Council note that it is not considered appropriate for unmet needs from Havant to be met in Test Valley.	577	362
Policy 6: Amount of Housing	n/a	Gosport Borough Council recognises the constraints within Havant Borough that affect meeting housing need, and supports the approach HBC has taken.	582	176
Policy 6: Amount of Housing	n/a	East Hampshire District Council (EHDC) raise concern about the significant level of unmet housing need - EHDC is clear that it is not in a position to accommodate the full extent of that unmet need. HBC has sought to maximise housing delivery within the constraints of its administrative area.	581	143
Policy 6: Amount of Housing	n/a	East Hampshire Council note that the presentation of the housing requirement, supply position and resulting unmet need could be clearer	581	143
Policy 6: Amount of Housing	n/a	Portsmouth City Council has taken a similar approach to identifying its own housing target. Both authorities have left no stone unturned in robustly identifying all sources of housing land supply.	588	252
Policy 6: Amount of Housing	Table 5	Need to correct the table - policy sums to 7,087, whilst the table totals 7,085.	299	016
Policy 6: Amount of Housing	Table 5	There is no evidence to demonstrate that the Council has applied the minimum density standards for the allocations.	300, 410	16, 446
Policy 6: Amount of Housing	2.105	The Plan is not consistent about how many of the dwellings on the Southleigh allocation fall within the plan period. The site profile records an indicative net yield of 2,100 dwellings (of which 1,500 in the plan period) whilst Table 5 indicates a total of 1,650 dwellings in the plan period. The outline application APP/26/00325 is for 1,800 dwellings, 300 fewer than the allocation. Raises concern that 16.40 dwellings would have to be completed by 2043, from an outline permission not yet granted and the Plan's housing supply is not therefore soundly evidenced.	410	446
Policy 6: Amount of Housing	2.108	Paragraph 2.108, at printed page 60, states that "around 40% of the Borough's overall housing need will be met and this will result in a large shortfall of housing delivery over the plan period in the region of 9,500 dwellings". On the Plan's own figures the arithmetic is 15,822 less 7,087, which is 8,735, and 7,087 of 15,822 is 44.8 per cent. Paragraph 2.108's two statements together imply provision of approximately 6,300 dwellings rather than 7,087. . The figures are some 800 dwellings and roughly five percentage points apart, within the same policy chapter and on consecutive pages. I raise this as a matter of internal consistency in the Plan's own account of its figures, in the same terms as the Table 5 arithmetic below, and for no other purpose; I make no submission that the requirement should be higher or lower.	299	016
Policy 6: Amount of Housing	n/a	A capacity led figure may be justified only where evidence demonstrates all reasonable options have been secured. Long Copse Lane has the ability to deliver a significant proportion of the allocations housing requirement in the first 5 years of the Plan.	602	454
Policy 7: Amount of Employment	n/a	The plan over allocates sites for industrial uses; amendments to the policy proposed	563	388
Policy 7: Amount of Employment	n/a	East Hampshire District Council state that it is unclear whether Havant is now meeting its employment need in full or whether part of the requirement continues to be accommodated by a neighbouring authority.	581	143
Policy 7: Amount of Employment	n/a	Portsmouth City Council notes that the two Councils have worked together to agree new policy wording and its supporting text. This reflects updated employment land figures from PCC, which has reduced the amount of employment floorspace it is able to offer HBC from 31,261 m2 to 22,743 m2.	588	252
Policy 7: Amount of Employment	n/a	*See Policy 10*	429, 430, 432 and 433	355
Policy 8: Five Year Housing Land	n/a	Reflects the 2024 NPPF and could be removed from the plan without detriment to the Council's intentions.	579	438
Policy 8: Five Year Housing Land	n/a	Considers the policy inconsistent with paragraph 11 of the NPPF	565	268
Policy 8: Five Year Housing Land Supply	n/a	Policy is unncessary because the NPPF already provides a framework for determining planning applications where a five-year housing land supply cannot be demonstrated. Changes proposed.	603	454
Policy 9: New Homes for Sustainable Communities	n/a	Support for policy	579	438
Policy 9: New Homes for Sustainable Communities	n/a	The policy needs to incorporate access to green and blue space	571	295
Policy 9: New Homes for Sustainable Communities	n/a	The Council, in implementing Policy 9, should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area.	572	164
Policy 9: New Homes for Sustainable Communities	n/a	It is not clear what purpose this policy serves other than to direct decision makers and applicants to other parts of the plan. Policy should be deleted.	565	268
Policy 9: New Homes for Sustainable Communities	n/a	The policy is unnecessary and repeats the functions of other policies.	604	454
Policy 10: Supporting a Strong and Prosperous Economy	2.147	Further flexibility is required in the policy. Amendments suggested.	563	388

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 10: Supporting a Strong and Prosperous Economy	n/a	The policy needs to reflect evidence and the inclusion of nature, nature recovery and nature based solutions as part of the economic strategy and policy-wording. The policy should recognise nature as a foundation for growth and supporting its integration across policy mechanisms.	571	295
Policy 10: Supporting a Strong and Prosperous Economy	n/a	Supports this policy, amendments have been proposed to add a criterion to show the importance of the construction of new homes for the economic sector.	579	438
Policy 10: Supporting a Strong and Prosperous Economy	b)	Policy supports “intensification of land for employment uses” within it; Concern that the traffic implications of the shift towards more storage & distribution at New Lane in recent years have not been considered. Cumulative impact on SRN with Southleigh must also be assessed	429, 430, 432 and 433	355
Policy 11: Climate Change	n/a	The policy is welcomed but needs to align with the LNRS, nature based solutions and mitigation alongside adaptation.	571	295
Policy 11: Climate Change	n/a	Supports the principle of this policy but there is a need for climate change measures to be tested to determine feasibility and viability and amendments made to the policy to reference the need for testing in respect of criterion a-m	579	438
Policy 11: Climate Change	n/a	Support for Policy	440	310
Policy 11: Climate Change	n/a	The Environment Agency are supportive of this policy and its intentions, especially the inclusion of bullets (g) tackling conservation of water resources and protecting and improving water quality, (h) addressing flood risk and (j) enhancing blue green infrastructure and biodiversity.	468	231
Policy 11: Climate Change	n/a	It is not clear what purpose this policy serves other than to direct decision makers and applicants to other parts of the plan. Policy should be deleted.	565	268
Policy 11: Climate Change	n/a	This is an expansive policy that duplicates numerous detailed policies while using wide and undefined requirements. It should not impose a further route to the exact energy standards contested under Policy 16. Changes proposed.	605	454
Policy 12: Health	HIA requirem	The requirement for a HIA on non-residential development over 1000 sqm is not justified or effective and provides unnnecessary burden on applications, therefore this requirement should be deleted.	563	388
Policy 12: Health	HIA requirem	HIA requirement is unnecessary requirement / should not apply to allocated sites / should avoid duplication with application material. Changes suggested.	259, 565, 569	441, 268, 439
Policy 12: Health	HIA	The ICB support the requirement for HIA	572, 587	164, 245
Policy 12: Health	n/a	Nature needs to be embedded into policy wording; including nature based health interventions and benefit will improve the policy's soundness.	571	295
Policy 12: Health	n/a	Support for policy	579, 259, 572	438, 441, 164
Policy 12: Health	n/a	The ICB welcomes this policy, but it does not yet address the full relationship between planning, health and healthcare infrastructure. Policy 12 and/or its supporting text should be modified to include healthcare infrastructure explicitly.	587	245
Policy 12: Health	supporti	Sport England welcomes reference to its Active Design Guidance	211	309
All Allocations	n/a	Proposed wording for all major allocations on the following topics: nature recovery, biodiversity net gain, mitigation hierachy, green infrastructure, access to nature	571	295
All Allocations	Figure 10	Southleigh Estate is missing from figure 10	332	308
All Allocations	Figure 10	Figure 10 does not identify Long Copse Lane	598	454
Allocation 1: Southleigh	n/a	Site promoter supports the allocation but has proposed amendments to the site description, key features and development requirements	579	438
Allocation 1: Southleigh	n/a	Does not wish for development to take place, and wants the site left alone for nature.	45	237
Allocation 1: Southleigh	n/a	South Downs National Park Authority considers that the allocation is not consistent with national policy; note there are no policy criteria related to the National Park and development within its setting. Suggested policy wording.	371	239
Allocation 1: Southleigh	n/a	Concerns around transport infrastructure as well as community infrastructure. Would like to see a commitment to the installation of a new junction on the A27 and provide compulsory and up front delivery of community infrastructure and/or imporovements Emsworth wide.	54, 407	117, 148
Allocation 1: Southleigh	n/a	To make the plan sound the allocation should either be removed or the numbers for development substatially reduced until the transport and infrastructure requirements have been demonstrated to be deliverable and fully funded.	208	140
Allocation 1: Southleigh	n/a	Emsworth Residents Forum object to the allocation in relation to 1. transport impacts and the way the STA has assessed the site; 2. wastewater capacity; 3. delivery assumptions and 4. a failure to comply with the the mitigation hiararchy	305	287
Allocation 1: Southleigh	n/a	ICB expresses concern that the allocation does not include a specific healthcare infrastructure requirement. (see also detail noted under IDP)	587	245
Allocation 1: Southleigh	n/a	Site makes no contribution to 5 year housing land supply, and therefore fails the 'effective' test	429, 430, 432 and 433	355
Allocation 1: Southleigh	n/a	Questions whether deliverability issues considered during examination of 2021 Local Plan Examination have been addressed (in particaulr in relation to need for railway crossing) - consider detailed commentary required	429, 430, 432 and 433	355
Allocation 1: Southleigh	n/a	Questions timescales assumed for delivery;	429, 430, 432 and 433; 305	355; 287
Allocation 1: Southleigh	n/a	Two different 'within the plan period' figures appear in the Plan's own evidence - needs correction	429, 430, 432 and 433	355
Allocation 1: Southleigh	n/a	Questions on the live Southleigh application's transport assessment. Consider this relevant to deliverability questions for the site in relation to Local Plan and recommend that Havant Civic Society's representation on APP/26/00324 (relating to transport) be considered as part of the evidence base for the Local Plan.	429, 430, 432 and 433	355
Allocation 1: Southleigh	n/a	Current live application APP/26/00324 and Allocation 29 close off the possibility of a full-access link directly to the A27. There appears to be no reasoned, current and consulted-upon decision underpinning this. Suggest full re-appraisal is needed.	429, 430, 432 and 433	355
Allocation 1: Southleigh	n/a	*see also Policy 4, criterion o) and Allocation 6: Land East of Castle Avenue*	*n/a*	*n/a*
Allocation 1: Southleigh	Develop ment	Request that the site allocation set out the presence of veteran trees and in line with site allocation 13, 23. Proposed amendments have been provided.	505	047
Allocation 1: Southleigh	k)	Proposed amendments have been suggested to add more detail to the criteria around transport infrastructure requirements.	206	095
Allocation 1: Southleigh	k)	Network Rail supports parts iii, viii and ix of the policy	413	079
Allocation 1: Southleigh	k)	HCC as LHA support principle of the South West Bridge Link and seek continued engagement on bringing it forward (k)iii)	583	144
Allocation 1: Southleigh	ee)	Consider whether to add 'and transport infrastructure' at the end of criterion ee	205	095
Allocation 1: Southleigh	3.16	Supports the policy but would welcome amendments which identifies access the landowners land under 3.16 delivery	499	449
Allocation 1: Southleigh	3.16	HCC as LHA strongly supports a comprehensive masterplan-led approach to the delivery of Southleigh	583	144
Allocation 1: Southleigh	3.17	Concern over deliverability of the bridge, given that the bridge connection extends beyond the allocation boundary and interfaces with Allocation 6	583	144
Allocation 2: Long Copse Lane	*n/a*	*Please note the 'Save the Long Copse Lane' group have provided a comprehensive representations, which provide a good overview of the spread of representations received from individuals*	410	446
Allocation 2: Long Copse Lane	n/a	For SA criteria 4e and 6a for both sites, Appendix E adds that the necessary infrastructure improvements "will need to be agreed with the Highway Authorities prior to development commencing". The allocation does not do this.	295	016

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Allocation 2: Long Copse Lane	n/a	The allocation of this site contradicts with the Plan's strategic aim of ensuring good accessibility by non-car modes (as expressed in para 2.23)	295	016
Allocation 2: Long Copse Lane	n/a	Concern that Long Copse Lane and the surrounding roads are narrow, constrained and unsuitable for additional traffic. Increased traffic would worse congestion and highway safety for pedestrians, cyclists and horse riders.	139, 140, 521, 360, 150, 155, 198, 252, 282, 283, 304, 319, 324, 327, 356, 390, 398, 405, 444, 463, 476, 480, 495, 500, 509, 521, 322, 593, 528, 446	307, 436, 198, 317, 121, 263, 067, 076, 003, 093, 086, 235, 006, 399, 375, 057, 058, 096, 112, 160, 380, 098, 384, 198, 431, 451, 314, 410
Allocation 2: Long Copse Lane	n/a	Impacts on Westbourne and the West Sussex transport network have not been adequately assessed or agreed with the relevant highway authority. There is insufficient assessment of east/west traffic distribution.	238, 282, 295, 528	284, 037, 016, 318
Allocation 2: Long Copse Lane	n/a	The Plan does not demonstrate that access would be sufficient to accommodate the proposed level of development.	528	314
Allocation 2: Long Copse Lane	n/a	Concern site is remote from services and facilities, limited accessibility by public transport, walking and cycling, resulting in car dependence.	295, 238, 252, 277, 295, 340, 398, 405, 593, 340, 356, 362, 405, 509, 593	16, 234, 67, 78 284, 238, 307, 81, 375, 57, 451, 81, 6, 366, 57, 384, 451
Allocation 2: Long Copse Lane	n/a	The Council's transport evidence base records this is as the least accessible site allocated in the Plan, and it received the least analysis in the Transport Assessment.	295	016
Allocation 2: Long Copse Lane	n/a	Emsworth Residents Forum raise concerns that the justification for the allocation relies on significant modal shift and behavioural change away from the private car	306	287
Allocation 2: Long Copse Lane	n/a	Concern that the allocation would harm the open countryside, rural character and setting of the South Downs National Park, and that it is inconsistent with the findings of the Council's Landscape Capacity Study.	295, 238, 252, 277, 295, 340, 398, 405, 593, 340, 356, 362, 405, 509, 593	016, 234, 067, 078, 284, 238, 307, 081, 375, 057, 451, 081, 006, 366, 057, 384, 451
Allocation 2: Long Copse Lane	n/a	The 2015 Landscape Capacity Study cannot be found in the Council's evidence base.	301	016
Allocation 2: Long Copse Lane	n/a	Concern about wastewater capacity at Thornham Wastewater Treatment Works and related pollution in Chichester Harbour. Funding/capacity identified for Chichester District's development does not provide a secured solution for allocations in Havant Borough. The delivery of improvements to wastewater control is outside both Councils' control. Unlike neighbouring authorities, the Plan does not have a policy which requires development to be phased to align with the delivery of wastewater infrastructure.	134, 139, 140, 144, 145, 149, 150, 156, 186, 198, 221, 222, 252, 266, 277, 278, 279, 281, 282, 293, 298, 309, 310, 324, 347, 356, 362, 363, 366, 368, 389, 390, 398, 405, 410, 421, 444, 454, 461, 463, 480, 521, 322, 528, 291	133, 307, 436, 358, 352, 400, 360, 199, 138, 263, 192, 236, 067, 154, 078, 092, 158, 262, 037, 016, 217, 293, 086, 191, 006, 366, 035, 248, 035, 416, 399, 375, 057, 446, 283, 058, 068, 152, 093, 160, 198, 431, 314, 371
Allocation 2: Long Copse Lane	n/a	Emsworth Residents Forum note that there is an unmitigated environment risk to the wider catchment without fully funded upgrades to wastewater infrastructure.	306	287
Allocation 2: Long Copse Lane	n/a	Concern that Allocation 2 would account for a disproportionate share of post five year nutrient demand in the Western Streams catchment, when mitigation has not been identified and existing credits are expected to be exhausted. Representors consider the allocation undeliverable, ineffective and inconsistent with the Habitats Regulations without secured mitigation.	186, 198, 221, 222, 277, 278, 281, 298, 324, 362, 390, 463, 480, 264, 265, 298	138, 263, 192, 236, 078, 092, 262, 016, 086, 366, 399, 096, 160, 092, 016
Allocation 2: Long Copse Lane	n/a	The Plan does not require there to be a proven scientific link between the proposed development and the mitigation scheme. Concern that the mitigation site will be in a different catchment to the mitigation site.	264, 265	092
Allocation 2: Long Copse Lane	n/a	Concern that development could adversely affect internationally designated habitats through increased nutrient loading, together with wider ecological and environmental impacts.	410	446
Allocation 2: Long Copse Lane	n/a	Concern that sewage and chemical pollution would be worsened, threatening human health, water quality and wildlife.	139, 140, 320, 509, 322	307, 436, 333, 384, 431
Allocation 2: Long Copse Lane	n/a	It has not been demonstrated that the site can be delivered within the plan period. Previous plans to develop the site have been withdrawn. It has not been demonstrated that the previous issues with the planning application have been addressed.	139, 155, 187, 463, 480, 518, 291, 410, 299	307, 121, 273, 281, 037, 016, 086, 248, 035, 096, 160, 314, 379, 446
Allocation 2: Long Copse Lane	n/a	Previous Local Plan Inspectors raised comparable concerns about deliverablility of sites where there need to provide protected species and nutrient neutrality mitigation	299	016
Allocation 2: Long Copse Lane	n/a	The 2014 Allocations Inspector identified constraints that have not been removed.	410	446
Allocation 2: Long Copse Lane	n/a	Concern that development would cause the loss of wildlife habitat and local biodiversity, and that these impacts could not be mitigated.	139, 140, 155, 198, 238, 252, 282, 308, 319, 474, 495, 500, 509, 291, 410	307, 436, 121, 263, 284, 067, 037, 144, 093, 029, 380, 098, 384, 379, 446
Allocation 2: Long Copse Lane	n/a	Emsworth Residents Forum state that the approach to protected species, Ancient Woodland and Southleigh Forest SINC is inconsistent with the NPPF.	306	287
Allocation 2: Long Copse Lane	n/a	Concern about the fragmentation of established wildlife corridors, including the Long Copse Lane 'ecological spine'	482	155
Allocation 2: Long Copse Lane	n/a	The development would result in pressure on bats, increased light and noise, reduced food supply and increased human disturbance.	261	092
Allocation 2: Long Copse Lane	n/a	Concern that the fragmentation of the ecological network will lead to cumulative habitat loss and disturbance. There is no requirement to require development to avoid fragmentation of the Local Ecological Network.	288	300
Allocation 2: Long Copse Lane	n/a	Insufficient coordination across boundaries to coordinate wildlife connectivity/assess the impact on Bechstein bats (duty to cooperate)	288, 297	300, 16
Allocation 2: Long Copse Lane	c)	The allocation does not require an ecologically sensitive lighting strategy or specify the buffer that should be provided.	288, 297, 261	300, 16, 92
Allocation 2: Long Copse Lane	n/a	The Council should ensure the current proposal has been assessed under the Environmental Impact Assessment Regulations appropriately, taking account of its revised site boundary and current circumstances.	155	121
Allocation 2: Long Copse Lane	n/a	The allocation does not identify the veteran trees on and adjacent to the site.	458, 352	155, 16
Allocation 2: Long Copse Lane	n/a	Concern raised in relation to the loss of mature and veteran trees	410	446
Allocation 2: Long Copse Lane	n/a	The site has footnote 7 constraints which justify planning for below housing need.	297	016
Allocation 2: Long Copse Lane	n/a	There is flexibility in the housing requirement to delete sites that have significant constraints.	410	446
Allocation 2: Long Copse Lane	n/a	Brownfield sites should be prioritised over the development of this site.	478, 480, 500, 593	136, 160, 098, 451
Allocation 2: Long Copse Lane	n/a	The proposed site yield of 325 dwellings is unevidenced - a net developable area has not been established. The need for ecological mitigation and TPO woodland is likely to constrain the developable area.	297, 299, 300, 301	016
Allocation 2: Long Copse Lane	n/a	It is a greenfield site, not brownfield land. Development of undeveloped countryside is not justified by general need for housing. Developer has previously described the site as brownfield.	155	121

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Allocation 2: Long Copse Lane	n/a	Concern that development would harm to the setting of adjacent heritage assets.	410	446
Allocation 2: Long Copse Lane	n/a	Recreational disturbance of overwintering birds should be addressed on site.	291	379
Allocation 2: Long Copse Lane	n/a	Concern that the site is not suitable due to flood risk and existing drainage issues. Development could increase flooding and surface water runoff affecting the site and neighbouring properties.	155, 293, 319, 461, 500, 593, 410	121, 326, 093, 152, 098, 451, 446
Allocation 2: Long Copse Lane	n/a	Development would place additional pressure on local infrastructure and community services, including schools, healthcare facilities and other local services. Existing capacity may be insufficient to accommodate the scale of development.	198, 282, 319, 320, 405, 509, 410, 295	263, 037, 093, 333, 057, 384, 444, 016
Allocation 2: Long Copse Lane	n/a	Concern that development and associated traffic would erode the rural character and recreational amenity of Long Copse Lane which is used regularly by walkers, cyclists and horse riders.	308, 327, 366, 463, 474, 476, 495, 593	144, 235, 248, 248, 096, 029, 112, 380, 451
Allocation 2: Long Copse Lane	n/a	The allocation of the site is not needed with a modest increase in density on other sites allocated in the Plan, plus the allocation of a number of sites previously rejected.	410	446
Allocation 2: Long Copse Lane	Key	The allocation does not refer to ancient woodland.	297, 507	16, 47
Allocation 2: Long Copse Lane	Key	There are Tree Preservation Orders which fall within the allocation boundary.	301, 352	016
Allocation 2: Long Copse Lane	Development requirements	Concerns raised in relation to the impact of development on Bechstein bats and their habitat including: - The allocation only describes Bechstein bats as being "potentially present" when there are known records; - There is not an up-to-date/sufficient bat assessment to support the allocation of the site; - It has not been demonstrated that protection/mitigation for this species can be secured.	187, 198, 277, 281, 283, 293, 296, 309, 310, 327, 389, 390, 398, 405, 412, 444, 461, 463, 480, 504, 521, 482, 291, 288, 297, 261, 482	273, 263, 078, 262, 076, 326, 116, 217, 293, 235, 416, 399, 375, 057, 233, 058, 152, 096, 160, 389, 198, 155, 379, 300, 016, 092, 155
Allocation 2: Long Copse Lane	b), c), j), q)	The South Downs National Park Authority support Criteria (b), (c), (j), and (q) which relate to the South Downs National Park, development in its setting, and opportunities for active travel and green and blue infrastructure connections.	372	239
Allocation 2: Long Copse Lane	d)	Network Rail welcomes the inclusion in part D of the draft allocation for providing access measures to Emsworth station in line with Hampshire County Council's Station Interchange Improvement Plan.	401	079
Allocation 2: Long Copse Lane	e) and s)	The allocation does not provide sufficient certainty that sustainable transport connections, including walking, cycling and bus links to Emsworth (recommended as mitigation by the SA), will be secured as part of the development.	134, 140, 144, 145, 149, 156, 187, 198, 221, 236, 238, 266, 277, 279, 281, 283, 286, 295, 296, 309, 310, 324, 347, 362, 363, 368, 389, 398, 421, 454, 461, 463, 474, 478, 480, 494, 509	133, 436, 358, 352, 400, 199, 273, 263, 192, 311, 284, 154, 078, 158, 076, 228, 016, 116, 217, 293, 086, 191, 366, 35, 416, 375, 283, 068, 152, 093, 029, 136, 160, 301, 384
Allocation 2: Long Copse Lane	e), f), q) and s)	The mitigation the Sustainability Appraisal required is not secured by the allocation: the plan says it set out to embed LTP4, and here it has not. Appendix E framed the transport requirement expressly as what is needed to accord with LTP4 policies on reducing car dependency. On this allocation, the measure identified as necessary for LTP4 conformity is the one measure not required, and it is also the one measure absent from the delivery plan.	295	016
Allocation 2: Long Copse Lane	f)	There is no certainty that works to achieve suitable access to the site, including the widening of the land can be delivered.	299, 352	016
Allocation 2: Long Copse Lane	k)	There is a conflict between the widening works required to achieve access and the allocation requirement to retain and enhance existing boundary vegetation.	295, 301, 352	016
Allocation 2: Long Copse Lane	j); m)	The allocation requirements do not recognise the River Ems strategic wildlife corridor	301	016
Allocation 2: Long Copse Lane	m)	The requirement does not reflect the requirement for a green corridor or ecological buffer (as set out in SA Appendix E)	288, 297, 261	300, 16, 92
Allocation 2: Long Copse Lane	m)	The allocation requirement only addresses Bechstein bats. Western barbastelle bats are also known to be present, and are a qualifying feature of a Special Area of Conservation.	288	300
Allocation 2: Long Copse Lane	s)	None of the identified cycling routes reach the allocation. Concern that it will not be possible to implement the improvements to these routes e.g. due to insufficient width.	295	016
Allocation 2: Long Copse Lane	o)	Concern that the allocation does not identify which trees are to be retained and integrated. The Key Features only refer to Tree Preservation Orders	301	016
Allocation 2: Long Copse Lane	n/a	Supports the allocation but several development requirements require clarification. See proposed modifications	596	454
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	*Please note the majority of representations covered Allocation 3 and Policy 30 together. All representations are covered here, under Allocation 3.*	*see below*	*see below*
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	*Please note Chichester Harbour Conservancy and the 'Save the Horsefield' group have provided comprehensive representations, which provide a good overview of the spread of representations received from individuals*	457; 501; 575	241; 201
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Allocation conflicts with the development strategy and other policies in the plan	273, 274, 351, 575	020, 328, 201
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Traffic and highway impacts: Transport Assessment inadequate, existing congestions, traffic noise, poor condition of roads;	006; 007; 023; 024; 031; 032; 033; 037; 041; 044; 047; 053; 066; 068; 072; 074; 076; 077; 082; 083; 084; 088; 091; 094; 100; 105; 110; 122; 124; 127; 129; 130; 132; 159; 160; 162; 164; 168; 175; 176; 178; 180; 182; 189; 191; 193; 194; 196; 209; 216; 223; 241; 242; 243; 244; 272; 302; 316; 326; 364; 373; 381; 383; 387; 396; 419; 408; 415; 425; 426; 434; 437; 466; 472; 485; 502; 531; 535; 536; 545;	368; 033; 108; 413; 354; 342; 119; 208; 109; 104; 343; 159; 097; 381; 411; 223; 017; 189; 369; 275; 203; 403; 179; 113; 408; 383; 106; 165; 363; 415; 280; 258; 193; 282; 074; 026; 162; 227; 156; 372; 418; 083; 428; 135; 130; 118; 427; 289; 205; 404; 010; 256; 430; 297; 174; 297; 368; 364; 087; 288; 213; 348; 292; 230; 324; 276; 105; 433; 291; 391; 267; 032; 402; 242; 082; 177; 299; 357; 290; 206; 147;

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Impact on infrastructure, insufficient infrastructure (GP surgeries, schools, roads, parking, community facilities)	006; 007; 009; 033; 037; 041; 053; 058; 068; 072; 074; 077; 083; 084; 088; 094; 105; 127; 152; 162; 164; 168; 176; 178; 180; 182; 189; 191; 193; 194; 196; 215; 216; 223; 241; 242; 243; 244; 272; 290; 302; 313; 316; 326; 380; 381; 383; 384; 396; 415; 419; 424; 425; 437; 451; 446; 481; 485; 500; 502; 531; 534; 536; 545; 552; 561;	368; 033; 127; 119; 208; 109; 159; 094; 381; 411; 223; 189; 275; 203; 403; 113; 132; 383; 106; 280; 224; 162; 227; 156; 418; 083; 428; 135; 130; 118; 427; 289; 205; 178; 010; 256; 430; 297; 174; 297; 368; 019; 364; 406; 087; 288; 051; 292; 230; 153; 276; 433; 291; 376; 391; 402; 242; 429; 177; 098; 299; 206; 357; 322; 147; 265; 090;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Harm to the National Landscape; landscape setting	006; 007; 009; 015; 016 + about 188 others	368; 033; 359; 407; 080 + about 188 others
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Loss of a clear settlement boundary, loss of strategic gap	006; 007; 028; 053; 068; 080; 082; 162; 164; 181; 189; 209; 237; 303; 325; 364; 392; 409; 446; 451; 553;	368; 033; 183; 159; 381; 421; 369; 162; 227; 050; 130; 404; 209; 341; 213; 181; 410; 168; 215; 365;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Imapcts on ecology (including SINC, Harbours SPA /SAC, Solent Brent Goos and Wader Sites)	006; 018; 039; 040; 042; 048; 053; 066; 068; 083; 103; 112; 128; 129; 130; 133; 142; 159; 162; 164; 170; 182; 196; 197; 223; 226; 209; 241; 242; 243; 244; 249; 272; 273; 289; 294; 307; 311; 313; 321; 325; 353; 355; 364; 381; 383; 392; 395; 408; 409; 419; 425; 428; 434; 451; 485; 500; 501; 511; 516; 518; 520; 524; 532; 545; 553; 560; 571; 561; 590;	368; 180; 088; 371; 211; 107; 159; 097; 381; 275; 039; 226; 277; 258; 193; 294; 069; 074; 162; 227; 049; 135; 205; 015; 256; 414; 377; 430; 297; 174; 297; 115; 368; 020; 077; 401; 287; 298; 406; 126; 341; 328; 220; 213; 292; 230; 181; 011; 276; 105; 410; 291; 391; 254; 032; 215; 177; 089; 241; 004; 323; 304; 219; 196; 434; 147; 365; 295; 259; 090; 367;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Loss of green space and rural character	006; 007; 009; 024; 032; 041; 048; 053; 059; 089; 105; 114; 121; 124; 130; 161; 176; 180; 181;194; 289; 290; 302; 303; 325; 384; 395; 396; 423; 425; 426; 446; 451; 485; 500; 501; 502; 516; 552; 553;	368; 033; 413; 342; 109; 170; 159; 142; 361; 383; 338; 021; 415; 193; 261; 418; 428; 050; 289; 077; 019; 364; 341; 153; 011; 276; 018; 391; 267; 168; 215; 177; 089;241; 299; 323; 265; 365;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Affect on / loss of footpath to the shore	028; 060	183; 007
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Environment Agency and other representors comment on potential effect on the adjacent watercourse; EA proposed additional policy criteria	496; 166; 381	231; 387; 292
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Contrary to the Emsworth Neighbourhood Plan	007; 039; 091; 164;	033; 088; 179; 227;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Flood Risk and Drainage (inadequate sewage infrastructure); Erosion Risk	007; 009; 018; 023; 024; 037; 041; 049; 053; 058; 068; 074; 077; 082; 090; 091; 096; 105; 110; 118; 127; 152; 160; 162; 174; 182; 194; 196; 209; 223; 237; 250; 272; 290; 302; 307; 313; 316; 325; 326; 364; 380; 381; 392; 396; 425; 434; 437; 466; 485; 501; 520; 531; 534; 561;	033; 127; 180; 108; 413; 208; 109; 218; 159; 094; 381; 223; 189; 369; 052; 179; 132; 383; 106; 165; 027; 280; 224; 026; 162; 102; 135; 289; 205; 404; 256; 209; 063; 368; 019; 364; 287; 406; 087; 341; 288; 213; 051; 292; 181; 276; 391; 032; 402; 215; 242; 117; 241; 219; 357; 322; 090;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Shortage of housing does not justify development in National Landscape	152; 273;	224; 020;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Impact on health and well-being, food security	009; 068; 083; 114; 159; 160; 180; 181; 182; 193; 209; 226; 249; 272; 289; 333; 419; 520;	127; 381; 275; 338; 074; 026; 428; 050; 135; 427; 404; 414; 115; 368; 077; 064; 291; 219;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Conflicts with policies protecting the Chichester Harbour, Chichester Harbour Management Plan	011; 039; 142; 164; 168; 273; 274; 316; 321; 345; 417; 501;	359; 088; 069; 227; 156; 020; 087; 126; 202; 141; 241;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	No exceptional circumstances/public interest assessment undertaken	011; 012; 013; 016; 018; 019; 020 + about 210 others	359; 146; 187; 080; 055; 0122 + about 210 others

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Will set a precedent	011; 014; 028; 040; 041; 042; 043; 059; 060; 063; 067; 068; 070; 072; 074; 076; 080; 082; 090; 097; 103; 105; 106; 109; + about 94 others	359; 187; 183; 371; 109; 211; 340; 142; 007; 330; 353; 381; 188; 411; 223; 017; 421; 369; 052; 039; 383; 186; + about 94 others
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Inconsistent with national policy and guidance, NPPF	017; 018; 053; 091; 096; 131; 142; 146; 159; 162; 166; 177; 191; 220; 224; 273; 274; 307; 331; 333; 345; 349; 351; 353; 355; 364; 379; 392; 409; 415; 417; 418; 446; 457; 497; 498; 501; 513; 518; 524; 531; 532; 560; 561; 575; 590;	180; 159; 179; 132; 025; 171; 069; 351; 074; 162; 387; 281; 118; 285; 313; 020; 287; 053; 064; 202; 141; 328; 328; 220; 213; 318; 181; 410; 433; 141; 303; 168; 241; 196; 310; 241; 013; 304; 196; 357; 434; 259; 090; 201; 367;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Policy 30 rewritten to enable development in National Landscape; does not protect National Landscape	017; 019; 020 + about 112 others	180; 055; 122 + about 112 others
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Development/allocation not justified; insufficient evidence; previously found unsuitable (SHELAA)	017; 018; 053; 069; 070; 072; 103; 108; 142; 158; 162; 171; 220; 214; 223; 273; 290; 303; 311; 321; 331; 333; 336; 344; 358; 364; 379; 403; 424; 431; 446; 448; 450; 466; 472; 501; 520; 522; 524; 525; 529; 531; 532; 553; 560; 561; 575; 580; 590;	180; 031; 159; 185; 246; 188; 411; 039; 069; 336; 162; 107; 285; 256; 020; 019; 145; 298; 087; 126; 053; 064; 305; 318; 082; 009; 075; 213; 172; 376; 376; 168; 167; 167; 242; 241; 219; 024; 196; 013; 219; 357; 434; 365; 259; 090; 201; 424; 367;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Consultation process legally flawed, late inclusion in the Plan, insufficient scrutiny; contrary to SCI	018; 043; 051; 152; 158; 162; 171; 220; 223; 241; 273; 284; 287; 311; 314; 321; 325; 331; 333; 344; 351; 353; 355; 364; 403; 424; 425; 439; 446; 448; 457; 496; 501; 502; 504; 520; 525; 531; 534; 560; 561; 594	180; 340; 350; 224; 336; 162; 107; 285; 256; 430; 020; 221; 442; 298; 064; 126; 126; 341; 053; 064; 009; 328; 328; 220; 213; 172; 376; 391; 001; 168; 167; 241; 231; 241; 299; 251; 219; 357; 322; 259; 090; 452
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Other impacts (heritage, archaeology, air and light pollution, climate change; environmental impacts; water supply; trees; water quality; minerals)	018; 024; 049; 058; 066; 068; 074; 091; 106; 110; 122; 127; 128; 129; 142; 159; 160; 166; 170; 174; 182; 209; 249; 272; 273; 333; 364; 380; 383; 426; 428; 451; 501; 518; 520; 532; 537;	180; 413; 218; 094; 097; 381; 223; 179; 165; 363; 280; 277; 258; 069; 074; 026; 387; 049; 102; 135; 404; 115; 368; 020; 213; 064; 061; 230; 267; 254; 215; 241; 304; 219; 013; 434; 396;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Emsworth overdeveloped already - cumulative impacts; site not needed - sites available elsewhere; brownfield sites should be prioritised;	007; 023; 034; 044; 048; 074; 084; 094; 097; 105; 110; 171; 175; 182; 193;228; 237; 209; 241; 250; 272; 302; 307; 313; 325; 331; 379; 380; 383; 392; 395; 396; 408; 415; 424; 425; 434; 481; 502; 516; 534; 537; 552;	033; 108; 417; 104; 107; 223; 203; 113; 025; 383; 165; 107; 372; 135; 427; 059; 209; 377; 430; 063; 368; 364; 287; 406; 341; 053; 318; 051; 324; 181; 011; 276; 105; 433; 376; 391; 032; 429; 196; 299; 323; 322; 396; 265;
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Against law; failed duty to further the conservation and enhancement of protected landscape	037; 125; 152; 159; 162; 166; 167; 170; 174; 177; 189; 197; 226; 273; 280; 303; 311; 314; 321; 353; 355; 364; 367; 392; 451; 457; 472; 481; 485; 497; 501; 534; 545; 560; 561; 564; 575; 590; 594	208; 151; 224; 074; 162; 387; 212; 049; 102; 281; 130; 015; 414; 020; 222; 145; 298; 064; 126; 328; 220; 213; 321; 181; 215; 241; 082; 429; 177; 241; 322; 147; 259; 090; 204; 201; 367; 452
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Previous planning applications have been refused	175, 177; 520	372, 281, 219
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	40 dph density is too high for this site	303	145
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Site promoter supports the allocation, but considers policy should refer to 'at least 90 dwellings', and that requirements should be more focused	578	443
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Chichester District Council do not consider that the allocation gives rise to any traditional cross-boundary impacts. However, in the absence of any assessment of the exceptional circumstances and public interest case for this allocation, together with the landscape evidence relied upon, so that the cumulative effect of development on the special qualities of the National Landscape as a whole can properly be understood, CDC express its serious concern with the allocation.	580	424

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Allocation 3: Land south of Havant Road (Horse's Field)	n/a	Southern Water note there is limited wastewater capacity. This is not an absolute constraint, but SW request additoinal development requirements	590	367
Allocation 4: Helmsley House	n/a	*no representations received*	*n/a*	*n/a*
Allocation 5: Southleigh Park House	n/a	*no representations received*	*n/a*	*n/a*
Allocation 6: Land East of Castle	n/a	Site promoter supports the allocation	567	439
Allocation 6: Land East of Castle Avenue	n/a	The site is a SWBGS candidate site (H19). The plan appears to move straight to mitigation or compensation for habitat loss without demonstrating that avoidance has been exhaused. The allocations should first demonstrate why loss in unavoidable before defaulting to mitigation.	571	295
Allocation 6: Land East of Castle Avenue	Development	South Downs National Park Authority consider that this allocation should contain a requirement to maintain and enhance a north-south green corridor (as per allocation 1, criterion L)	374	239
Allocation 6: Land East of Castle Avenue	Development	Network Rail express support for development requirements i,j,k,p	411	079
Allocation 6: Land East of Castle Avenue	Development	Site promoter and HCC as LHA express concern over interaction of Allocation 6 with access arrangements for Allocation 1 (including safeguarding in Policy 4)	583, 567	144, 439
Allocation 7: Former Oak Park School	n/a	Support for allocation, but request flexibility on number of care home beds to be provided.	506	445
Allocation 8: Palk Road	n/a	Site promoter supports the allocation	576	444
Allocation 8: Palk Road	Development	Network Rail express support for development requirements c, h, i	420	079
Allocation 9: Belmont Castle Rest Homee, 18-20 Portsdown Hill Road	n/a	*no representations received*	*n/a*	*n/a*
Allocation 10: Land South of Lower Road (Phase 2)	n/a	*no representations received*	*n/a*	*n/a*
Allocation 11: Kingscroft Farm	n/a	*no representations received*	*n/a*	*n/a*
Allocation 12: Portsmouth Water Headquarters	n/a	The site contains a SWBGS candidate site (H19. The plan appears to move straight to mitigation or compensation for habitat loss without demonstrating that avoidance has been exhausted. The allocation should first demonstrate why loss in unavoidable before defaulting to mitigation.	571	295
Allocation 12: Portsmouth Water Headquarters	n/a	Will the Portsmouth Water buildings of architectural interest be protected?	559	393
Allocation 13: Cabbagefield Row	f)	Welcome the explicit reference to the presence ancient woodland and veteran trees and the robust requirements for their protection	508	047
Allocation 14: Strouden Court	n/a	*no representations received*	*n/a*	*n/a*
Allocation 15: Land West of Hulbert Road	g)	The allocation requirement does not mention the ancient woodland adjacent to the site. Proposed change.	510	047
Allocation 16: Dunsbury Way	n/a	*no representations received*	*n/a*	*n/a*
Allocation 17: Former Electricity Board, Bartons Road	n/a	*no representations received*	*n/a*	*n/a*
Allocation 18: Padnell Grange	n/a	Site promoter supports the allocation	259	441
Allocation 18: Padnell Grange	n/a	Site can accommodate 90 new homes. The housing number in the allocation should be adjusted to 90 units, or to a 'minimum of 84'	259	441
Allocation 18: Padnell Grange	n/a	Presence of a veteran tree is not acknowledged in policy	512	047
Allocation 18: Padnell Grange	n/a	HCC as LLFA raises concerns regarding the deliverability of the site as there does not appear to be an obvious suitable drainage outfall and there may therefore not be an acceptable surface water drainage solution.	583	144
Allocation 18: Padnell Grange	key	Clarifications and deletions sought of some key features relating to commercial site and historic value	259	441
Allocation 18: Padnell Grange	development	Suggested amended wording / deletions to requirements f, h, k	259	441
Allocation 19: Blue Star	n/a	Site promoter supports the allocation	404	450
Allocation 20: Goodwillies Timber	n/a	*no representations received*	*n/a*	*n/a*
Allocation 21: West of Waterlooville Major Development Area (Phases 4 and 8)	n/a	Support for the continued allocation of phase 4, but not the allocation of phase 8 which is under construction.	523	450
Allocation 21: West of Waterlooville Major Development Area (Phases 4 and 8)	h)	Requiring connections to the Local Walking and Cycling Infrastructure (LCWIP) Proposed Primary Cycle Route 360 is unnecessary for Phase 4	523	450
Allocation 22: South Downs College Car Park	n/a	*no representations received*	*n/a*	*n/a*
Allocation 23: Campdown	n/a	Concerns as to why a site with ecological importance has been allocated.	571	295
Allocation 23: Campdown	n/a	Site makes no contribution to 5 year housing land supply, and therefore fails the 'effective' test	429, 430, 432 and 433	355
Allocation 23: Campdown	n/a	Complex site and pre-assessment dependencies. Questions whether deliverability issues considered during examination of 2021 Local Plan Examination have been addressed (in particalar in relation to impact on heritage assets and protected bird mitigation)	429, 430, 432 and 433	355
Allocation 23: Campdown	n/a	No site-specific costed infrastructure entry or viability test has been identified for Campdown	429, 430, 432 and 433	355
Allocation 23: Campdown	n/a	National Highways currently recommends against permission on the live application APP/23/00488	429, 430, 432 and 433	355
Allocation 23: Campdown	development	Supports development requirements in relation to trees	514	047
Allocation 24: Waterloo Park	n/a	The allocation red line should be amended to omit the completed Phase 1 and 2 site boundaries. If this is not possible then the wording of the site description should be amended. The yield is incorrect and should be ameneded.Class E should be listed as an explicit use .The allocation should also allow for a hotel to be built. Amendments to the key features are proposed as well as development requirments.	563	388
Allocation 25: Dunsbury Park	n/a	Request that the site allocation set out the presence of veteran trees in line with site allocations 13 and 23. Proposed amendments provided.	517	047
Allocation 26: Former Colt Site	n/a	Consider the site for residential/mixed home working.Allow for flexibility for the sites use due to inactivity on the site for a number of years.	330	012
Allocation 27: Gas Holder site, Downley Road, New Lane	n/a	*no representations received*	*n/a*	*n/a*
Allocation 28: Langstone Park	n/a	Support for allocation.	573	437
Allocation 28: Langstone Park	n/a	The policy should acknowledge previous planning permissions which together allow for up to 63290 sqm of employment floorspace to come forward. Amendments proposed.	573	437
Allocation 29: Interbridges West	n/a	Network Rail supports the policy	422	079
Allocation 29: Interbridges West	n/a	Supports the policy	579	438
Allocation 30: Interbridges East	n/a	Network Rail supports the policy	427	079
Policy 13: High-quality Design	n/a	The policy needs to integrate nature into building design and infrastructure to maximise benefits.	571	295
Policy 13: High-quality Design	n/a	Supports the Council's aims of this policy. Viability is a factor in decision making, should be reflected in policy.	579	438
Policy 13: High-quality Design	n/a	Support for Policy	441	310
Policy 13: High-quality Design	n/a	Consider the policy is unnecessary as it will largely be achieved through the Future Homes Standard. Greater clarity as to how thermal comfort will be achieved will be required.	565	268

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 14: Housing Density	n/a	The policy should focus on a design led approach. Council should consider removing the policy as Policy 13 provides sufficient comfort to address matters raised in Policy 14. If the policy is retained the density target should be an indicative target to allow for flexibility.	579	438
Policy 14: Housing Density	n/a	Request for greater flexibility and clarification of requirements sought	259	441
Policy 14: Housing Density	n/a	Support for policy and proposed densities	445	310
Policy 14: Housing Density	n/a	In meeting specific densities, local market conditions, viability and prevailing character need to be taken into account. Clarity needed as to how it would be determined a developer has artifically lowered densities.	565	268
Policy 14: Housing Density	b)	The policy should recognise that an optimised density will depend on constraints, character, infrastructure, viability, market conditions and ability to secure a high-quality, deliverable scheme. Proposed alternative wording.	569	439
Policy 14: Housing Density	Mapping	"Defined opportunity areas" are not included within the policy or the Policies Map.	569, 597	439, 454
Policy 14: Housing Density	n/a	Policy too rigid, there are other considerations which can appropriately influence density. See suggested changes.	597	454
Policy 15: High-quality New Homes	a) and 4.48	Supportive of the Council's intentions but the policy should include flexibility to ensure homes meet locally identified need. Amendments have been suggested.	579	438
Policy 15: High-quality New Homes	n/a	Broad support for policy, suggests need for cycle storage to support active travel and access to allotments and community orchards as well as outdoor amenity space.	447	310
Policy 15: High-quality New Homes	n/a	Add a criterion allowing an alternative quantum and/or distribution where justified by site-specific constraints, design, viability, delivery considerations or evidence of need.	569	439
Policy 15: High-quality New Homes	c)	Amend criterion c) to require 25% M4(2) only where supported by current, locally specific evidence of need and where feasible and viable.	569	439
Policy 15: High-quality New Homes	c)	The policy should acknowledge that where no on site affordable housing is provided, no M4(3) provision will be required.	574	448
Policy 15: High-quality New Homes		Requirements for M4(2) and M(3) must be robustly evidenced. Policy should recognise provision of private amenity space and any balance between apartments and houses must respond to the overall scheme. Flexibility sought.	606	454
Policy 16: Low Carbon Development	n/a	Support for policy	571	295
Policy 16: Low Carbon Development	n/a	Requirements should be subject to viability, housing need and site-specific factors.	574	448
Policy 16: Low Carbon Development	n/a	Concern that the policy approach will lead to an increasingly lack of consistency in how energy efficiency standards are applied and that this will slow down housing supply	574	448
Policy 16: Low Carbon Development	4.73 and	Inconsistency between paragraphs 4.52 and 4.73 regarding need to reduce the need for retrofitting	449	310
Policy 16: Low Carbon Development	b) and c)	The energy consumption and space heating demand targets are inconsistent with national policy and should be deleted or amended to percentrage reductions. Further consideration is needed as to how this will be delivered alongside the Future Home Standard. The policy approach should now be updated following the publication of the Future Homes Standards and the 2026 NPPF (Policy PM13). Suggested change to align with nationally prescribed standards. Questions about impact on development viability.	565; 574; 607	268; 448; 454
Policy 16: Low Carbon Development	d)	Criterion d) is unduly absolute. On-site renewable energy should only be required where feasible and viable, with justified alternative measures. Replacement criterion proposed.	569	439
Policy 16: Low Carbon Development	e)	The requirement for an embodied carbon assessment is not supported by national policy. If it is to be applied, then it is not clear what the "do nothing approach" means. Suggested alternative approach.	563; 565; 569	388; 268; 439
Policy 17: Preventing Overheating	n/a	The policy is not justified or proportionate. The policy duplicates existing regulations and imposes unnecessary burden on development especially in relation to commercial development. Amendments have been proposed.	563	388
Policy 17: Preventing Overheating	n/a	Support for Policy	452, 571	310, 295
Policy 17: Preventing Overheating	n/a	It is not clear whether this policy seeks to go beyond Part O of the building regulations.	565	268
Policy 17: Preventing Overheating	b)	Do not consider that removal of reliance on air condition systems is justified or consistent with national policy.	565	268
Policy 18: Sustainable Construction Methods, Materials and Waste	n/a	Policy does not comply with the NPPF	30	125
Policy 18: Sustainable Construction Methods, Materials and Waste	n/a	Support for Policy	453	310
Policy 19: Water Efficiency	n/a	The plan currently does not address water supply. The plan needs to take account of the existing water supply and demonstrate that there is sufficient capacity for proposed developmet in the plan.	38	088
Policy 19: Water Efficiency	n/a	Support for Policy	454	310
Policy 19: Water Efficiency	n/a	Environment Agency supports this policy	469	231
Policy 19: Water Efficiency	n/a	Supports the objectives of the policy. It was recommended the policy includes reference to future updates to Part G.	579	438
Policy 19: Water Efficiency	a)	The requirement of 110 l/p/d is insufficient. Recommendation that the Council amends policy to 90 l/p/d or less to support national evidence.	571	295
Policy 20: Biodiversity Net Gain	n/a	Support for Policy	259	441
Policy 20: Biodiversity Net Gain	n/a	Recommendation for policy wording requiring all development proposals, including those exempt from minimum biodiversity net gain standards, seeks to maximise biodiversity gain. Recommendation the Council sets 20% BNG requirement for site allocations and include it within viability testing. The plan cannot be considered effective without demonstrating that tat BNG delivery will contribute to local ecological recovery, rather than simply meeting minimum statuory requirements.	571	295
Policy 20: Biodiversity Net Gain	e); f) and 4.142	Supports the approach of the policy, amendments have been proposed around securing credits and validation checklist	579	438
Policy 20: Biodiversity Net Gain	n/a	Support flexibility in application of policy	259	441
Policy 20: Biodiversity Net Gain	n/a	Policy repeats national policy, question whether policy is necessary.	574	448
Policy 20: Biodiversity Net Gain	a); d)	Council should consider increasing the percentage and also the length of time mitigation is secured	456	310
Policy 20: Biodiversity Net Gain	e) ii.	Consider the criterion should be deleted as it is inconsistent with the PPG BNG hierarchy which makes no distinction with regard to offsite habitats.	565	268
Policy 20: Biodiversity Net Gain	n/a	Supports policy, subject to statutory biodiversity net gain regime and site specific approach. The policy should be applied alongside the requirements for Allocation 2.	608	454
Policy 21: International and National Nature Conservation Sites	n/a	Support for Policy	459	310
Policy 21: International and National Nature Conservation Sites	n/a	Welcome the policy, but recommend that development is directed away from LNRS APIB and ACB areas.	571	295
Policy 21: International and National Nature Conservation Sites	n/a	Portsmouth City Council welcomes the policy and its recognition that development must protect, conserve and enhance these designated habitats and landscapes.	588	252
Policy 21: International and National Nature Conservation Sites	4.147	The reference to the NPPF para 33 is taken out of context. It refers to development as a whole and does not provide an avenue by which development of nationally and internationally protected sites can be entertained if forms of mitigation are proposed.	564	204
Policy 22: The Local Ecological	n/a	Support for policy	460	310
Policy 22: The Local Ecological Network	n/a	Request to formally record the community asset boundaries of the site within the spatial evidence data logs supporting Policy 22.	550	111

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 22: The Local Ecological Network	n/a	Welcomes the policy but recommends strengthening the wording to reflect designated sites, reflecting the mitigation hierachy, developments use the Building with Nature standards or similar accreditation, development contributes to the green and blue strategy and onsite mitigation and BNG are prioritised. Recommend the the protection of chalk streams is included in policy wording.	571	295
Policy 22: The Local Ecological Network	n/a	The Plan introduces the local concept of irreplaceable habitat and then opens an exception to development of it. This is a contradiction in terms. The plan could be made sound by deleting the phrase 'unless in wholly exceptional circumstances'.	564	204
Policy 23: Recreation Disturbance on International Sites	n/a	Support for policy	385/586	040
Policy 23: Recreation Disturbance on International Sites	n/a	Does not believe the Bird Aware scheme appropriately compensates the impact of development.	462	310
Policy 23: Recreation Disturbance on International Sites	n/a	Policy does not go far enough to fully integrate mitigation, alternative green space provision, management and monitoring. The plan should deonstarte sufficient alternative natural greenspace capacity before allocating major housing growth. The policy should also be extended across designated and non-designated wildlife areas.	571	295
Policy 23: Recreation Disturbance on International Sites	n/a	Limits should be placed on the use of existing SWBGS Core areas for mitigation to make the Plan sound.	564	204
Policy 23: Recreation Disturbance on International Sites	n/a	Support the reference to the Bird Aware Solent Strategy, that was jointly prepared with other local authorities including both Havant and Test Valley.	577	362
Policy 23: Recreation Disturbance on International Sites	n/a	Portsmouth City Council welcome the policy, and the Council's recognition that the protection of Solent SPA and Ramsar sites is a wider cross-boundary issue which requires a coordinated approach.	588	252
Policy 24: Water Quality Effects on International Sites	n/a	Support for Policy	385/586	040
Policy 24: Water Quality Effects on International Sites	n/a	Believe the policy is legally compliant and sound but should also address other sources of water pollution.	464	310
Policy 24: Water Quality Effects on International Sites	n/a	Welcomes policy but recommends that mitigation proposals incorporate opportunities for creating and improving habitats to best align with LNRS objectives. Nutrient neutrality delivery schemes shoud be encouraged to go beyond offsetting and secure nutrient reduction.	571	295
Policy 24: Water Quality Effects on International Sites	4.191	Consideration should be made to the commercial implications and practicalities of requiring developers to reserve credits prior to owning a site or having certainty of outline planning permission. As set out in the policy the approach is impractical for larger phased development. Proposed amendments suggested	579	438
Policy 24: Water Quality Effects on International Sites	n/a	Portsmouth City Council recognise nutrient neutrality and the provision of infrastructure to address nutrient capacity at wastewater treatment works is a matter of mutual importance and of relevance to both authorities.	588	252
Policy 25: Protected and Notable Species	n/a	Support for Policy	475	310
Policy 25: Protected and Notable Species	n/a	Wecomes the policy but recommends that this policy aligns with the LNRS wording to ensure that where compensation is requird it provides net gains for wildlife and supports nature recovery.	571	295
Policy 26: Solent Wader and Brent Goose Strategy Sites	n/a	Support for policy	571	295
Policy 26: Solent Wader and Brent Goose Strategy Sites	n/a	Support for policy but has asked for a minor amendment to strengthen the policy around consulting the SWBGS Steering Group	385/586	040
Policy 26: Solent Wader and Brent Goose Strategy Sites	n/a	Functionally linked sites should be allocated for mitigation in the plan	477	310
Policy 27: Flood Risk	n/a	Natural England welcomes that the Local Plan contains a dedicated Flood Risk Policy	385/586	040
Policy 27: Flood Risk	n/a	Environment Agency (and other representors) are supportive of this policy and the approach within it. EA considers that it provides a strong framework to ensure new development in Havant takes account of flood risk now and in the future	471, 317, 328, 479, 571	231, 346, 012, 310, 295
Policy 27: Flood Risk	n/a	Policy could be more precautionary over where development can be permitted on the mainland	479	310
Policy 27: Flood Risk	n/a	Support for policy, but question HBC's ability to enact the approach to Hayling Island in light of Rook Farm Appeal	541, 564	243, 204
Policy 27: Flood Risk	b)	Approaches to greenfield sites and to sites in settlement boundary on Hayling Island are inconsitent	562, 570	325, 440
Policy 27: Flood Risk	b)	The plan should impose infrastructure costs on developers wishing to develop on Hayling Island through S106 and Community Infrastructure Levy funding being put into a flood mitigation fund.	564	204
Policy 28: Drainage	n/a	Natural England welcome the inclusion of a Drainage Policy which includes the incorporation of Sustainable Drainage Systems (SuDS)	385, 586	040
Policy 28: Drainage	n/a	The policy should apply a green SuDS first approach	571	295
Policy 28: Drainage	n/a	The policy is not justified, the evidence base does not explain the requirement for betterment or demonstrate that it is viable or deliverable. The policy should provide flexibility to depart from the requirmenet where it would be technically difficult to achieve or make an application unviable. Amendments proposed.	563	388
Policy 28: Drainage	b)	Inconsistent with 2026 NPPF F8	583	144
Policy 28: Drainage	e)iii and 4.249	The policy requirement for post development run-off rates on brownfield sites is not consistent with the supporting text; this needs to be more flexible. Revised policy wording suggested.	506	442
Policy 29: Development on the Coast	n/a	Natural England supports this policy, in particular the Coastal Change Management Areas (CCMAs) elements; supports the Council's proactive approach to managing the long-term impacts of coastal change. Encourages keeping CCMAs under review as evidence changes in the future.	385, 586	040
Policy 29: Development on the Coast	n/a	The policy could be strengthened by placing greater emphasis on environmental enhancements alongside the existing focus of the policy. The policy could also benefit from explicitly applying the mitigation hierachy, addressing coastal squeeze, safeguarding blue carbon habitats, prioritising nature based solutions.	571	295
Policy 29: Development on the Coast	a); b)	Clarity sought regarding definition of 'undeveloped coast'	564	204
Policy 29: Development on the Coast	c)iii and para	There is no basis for limiting the number of moorings or berths, or intertidal structures such as jetties and slipways in Langstone Harbour	1	043
Policy 29: Development on the Coast	n/a	Clarity sought on how CCMAs have been defined; concern over inconsistencies in particular in relation to secondary CCMA and which parts of HI should be noted as such	564, 329, 483, 543, 312	204, 12, 310, 243, 197
Policy 29: Development on the Coast	n/a	Concern about contradiction between Coastal Strategy Intents and CCMAs	3	319
Policy 29: Development on the Coast	n/a	There should be a cross reference to the National Landscape restricting development on the east side of Hayling Island	312	197
Policy 29: Development on the Coast	n/a	Request that the spatial evidence data logs supporting the policy formally record the community asset boundaries of the Warren Close Foreshore Trust (Title SH60787). Policy interpretations or future infrastructure interventions targeting this shoreline segment should account for the legally recorded natural movements of accretion and diluvion on this title.	551	111
Policy 30: Nationally Protected Landscapes	n/a	Welcomes the policy but recommends the policy should be strengthened to reflect the Council's biodiversity duty the policy should also show more ambition than currently drafted.	571	295
Policy 30: Nationally Protected Landscapes	n/a	*See also Allocation 3. The majority of representations covered the allocation and Policy 30 together*	*see Allocation 3*	*see Allocation 3*
Policy 30: Nationally Protected Landscapes	e) to h)	South Downs National Park Authority support this policy, especially reference to the South Downs Dark Night Skies TAN.	370	239

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 31: Trees, Hedgrows and Woodland	n/a	Support for the policy	484	310
Policy 31: Trees, Hedgrows and Woodland	n/a	The planning policy should seek to maximise the multifunctional benefits of tree planting. The policy should be amended to follow best practice and require 25% tree canopy coverage.	571	295
Policy 31: Trees, Hedgrows and Woodland	c)	Proposed ammendments to criterion c to allow for exceptional circumstances.	579	438
Policy 31: Trees, Hedgrows and Woodland	n/a	policy not strong enough - should protect all existing trees not just TPOs	564	204
Policy 32: The Historic Environment	(Policies 32-27)	Historic England welcome the inclusion of policies for the historic environment in the local plan, and consider the plan sound in relation to the historic environment.	584	005
Policy 32: The Historic Environment	(Policies 32-27)	Policies should include more nature and wildlife characteristics and protections within them. Recommend that the ambition for nature recovery is included within the policies.	571	295
Policy 32: The Historic Environment	n/a	Traditional Architecture Design Codes should be a central component; Greater protection required for buildings constructed prior to 1950	25	084
Policy 33: Conservation Areas	n/a	*no representations received*	*n/a*	*n/a*
Policy 34: Listed Buildings	n/a	Support for Policy, but it is important that the owners of listed buildings get more help with retrofitting advice.	486	310
Policy 35: Archaeology	n/a	*no representations received*	*n/a*	*n/a*
Policy 36: Locally Listed Buildings and Non-Designated Heritage Assets	n/a	*no representations received*	*n/a*	*n/a*
Policy 37: Improvements in Energy Performance of Historic Assets	n/a	Support for Policy, with proviso that owners and custodians should be able to access suitable advice.	487	310
Policy 38: Affordable Housing	n/a	Concerns around viability with this policy. Flexibility requested due to challenges with securing registered providers. Suggested amendments to address concerns.	579	438
Policy 38: Affordable Housing	n/a	Support for Policy	259	441
Policy 38: Affordable Housing	n/a	Support flexibility in application of policy	259	441
Policy 38: Affordable Housing	n/a	Viability should be referenced in the policy	565	268
Policy 38: Affordable Housing	n/a	Plan does not explain the evidence base for the proposed tenure split. The Council should demonstrate the prescribed mix is deliverable. The policy should also provide flexibility for a different tenure mix. Suggested changes.	569	439
Policy 38: Affordable Housing	n/a	The policy should be updated to provide specific guidance as to how older persons housing development will address this policy. Suggested change.	574	448
Policy 38: Affordable Housing	b)	A higher proportion of social rent homes should be required	488	310
Policy 38: Affordable Housing	n/a	Policy must be demonstrably viable and deliverable. The 35% Emsworth greenfield requirement and the tenure split need to be supported by current viability evidence. There is a need for tenure mix to be flexible. Changes proposed.	609	454
Policy 39: Housing Mix	4.385	Supports the policy appraoch, it is suggested that wording amendments are made to signpost to the latest analysis as the figures from the 2023 Housing Needs Analysis may not be the most up to date position.	579	438
Policy 39: Housing Mix	n/a	A more flexible approach to housing mix should be taken for older persons' housing.	365	390
Policy 39: Housing Mix	n/a	Recommend that the policy for older persons housing further states a range of typologies will be provided to address the needs of specialist housing groups which facilitate downsizers	574	448
Policy 40: Retirement and Specialist Housing	n/a	Supports the policy and specific allocations for older person's housing	365	390
Policy 40: Retirement and Specialist Housing	n/a	Allocation of sites within the plan for older persons housing welcomed.	574	448
Policy 40: Retirement and Specialist Housing	n/a	The 2026 NPPF provides a national policy (Policy HO9) - it may be wiser to refer to this national policy than seeking to introduce a local policy.	574	448
Policy 41: Residential Annexes	n/a	*no representations received*	*n/a*	*n/a*
Policy 42: Self and Custom Build Housing	n/a	Requests that consideration is given to some difficulties in relation to the marketing of self and custom build plots. Also concerns that the policy could generate a large over supply.	579	438
Policy 42: Self and Custom Build Housing	n/a	Consider there is no evidence to support the policy requirement. Suggested alternative wording.	565	268
Policy 43: Gypsies, Travellers and Travelling Showpeople	n/a	East Hampshire District Council recommend that a high need for gypsy and traveller pitches and travelling showpeople plots in neighbouring authorities is recognised within the policy.	581	143
Policy 44: Protecting Employment Uses	n/a	The policy is not positively prepared, justified, effective or consistent with national policy. Waterloo Park should be deleted from the designation, and more flexibility to respond to market changes.	563	388
Policy 44: Protecting Employment Uses	4.436	Whilst supportive of the principle of the policy, the policy in its current form does not provide sufficient flexibility for alternate or even temporary uses at sites that are currently unviable for marine employment. Amendments have been proposed.	566	447
Policy 44: Protecting Employment Uses	n/a	Supports the objectives of Policy 44. Concerns around inconsistencies with the policy approach to proposals which might result in the loss of employment floorspace to other uses and request an exception criterion. Proposed amendments have been put forward. The map for the policy also has inconsistencies with the title of the policy.	573	437
Policy 44: Protecting Employment Uses	n/a	Suggested that additional criterion be added to allow for situations in which the loss of employment uses may be welcome due to operational or planned future uses.	579	438
Policy 44: Protecting Employment Uses	4.43O	seeks amendment to require that further intensification or redevelopment proposals specifically at the New Lane Industrial Estate be supported by transport evidence independently verified against observed traffic data	429, 430, 432 and 433	355
Policy 45: Town, District and Local Centres	n/a	The policy should integrate nature into urban environments.	571	295
Policy 45: Town, District and Local Centres	a) and c)	Suggests amendments to the policy to recognise the specific circumstances of new local centres and ensure that the requirements of the policy are flexible	579	438
Policy 46: Local Shops Outside of Designated Centres	n/a	*no representations received*	*n/a*	*n/a*
Policy 47: Food, Drink and Entertainment Uses	c)	Consideration should be given to the application of the policy and further clarification about the 400m restriction does not apply to designated local centres including the proposed Southleigh local centre. Amendments proposed.	579	438
Policy 47: Food, Drink and Entertainment Uses	d)	A blanket restriction on drive thru restaurants regardless of site-specific circumstances is not sound. The policy should adopt a criteria based approach to consider individual merits of an application. Proposed amendments have been provided.	563	388
Policy 48: Protecting Existing Community Facilities	a) and paragraph 4.463	Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community. Wording changes suggested for 4.463 linked to criterion a.	572	164
Policy 48: Protecting Existing Community Facilities	4.465-4.467	Support for policy. The requirements around the disposal of Assets of Community Value have been strengthened and the policy and supporting text should reflect this	213	422
Policy 48: Protecting Existing Community Facilities	4.465-4.467	East Hampshire District Council state there is a need to clarify how a Assets of Community Value (ACV) designation would be considered. Suggested wording for consistency.	581	143

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Policy 49: Amenity and Pollution	n/a	*no representations received*	*n/a*	*n/a*
Policy 50: Air Quality	n/a	Welcomes the policy but recommends the inclusion of nature based solutions to offset emissions.	571	295
Policy 50: Air Quality	n/a	Would like to see policy better implemented and monitored	489	310
Policy 51: Aquifer Source Protection Zones	n/a	The policy contains no clear mechanism to refuse development where risks to groundwater remain unacceptable. The policy should contain a clear test that development will not be adversely affected.	571	295
Policy 51: Aquifer Source Protection Zones	n/a	Environment Agency support the policy	471	231
Policy 51: Aquifer Source Protection Zones	n/a	Policy supported, but should make clear that "non-householder development" includes residential development.	490	310
Policy 51: Aquifer Source Protection Zones	4.496	Specialised geotechnical advice should be required in all cases (instead of"likely to be required").	490	310
Policy 51: Aquifer Source Protection Zones	Figure 26	Both types of green shading are identified as Aquifer Source Protection Zone 1 – but there should be a difference between SPZ1 and SPZ1c.	490	310
Policy 52: Contaminated land	n/a	Support for the policy	491, 473	310, 231
Policy 53: Accessibility, Transport and Parking	n/a	Poor state of the Langstone / Hayling Bridge should be recognised	564	204
Policy 53: Accessibility, Transport and Parking	n/a	National Highways consider policy sets out appropriate assessment requirements for planning applications	585	238
Policy 53: Accessibility, Transport and Parking	n/a	National Highways suggest amended policy wording (or ideally amended policy wording for a number of allocations to flag proximity of sites to the SRN).	585	238
Policy 53: Accessibility, Transport and Parking	d)iii	Traffic generated should not result in 'unacceptable' impacts rather than as stated 'severe'	201	095
Policy 53: Accessibility, Transport and Parking	d)v	Supports the Council's vision led approach. However clarification is needed for the developer requirements around criterion d)v.	579	438
Policy 53: Accessibility, Transport and Parking	4.531	wording changes suggested to supporting text	202	095
Policy 54: New Accesses onto Classified Roads	n/a	*no representations received*	*n/a*	*n/a*
Policy 55: Protecting Open Space	Policy wording	Southern Water suggest additional criterion to allow loss of open space for the purposes of essential utilities infrastructure (where no reasonable alternative site is available)	590	367
Policy 55: Protecting Open Space	Policies Map	Southern Water notes that the site proposed for the Waste Water Recycling Project is shown as protected open space on the Policies. SW consider there is no rationale or justification for this.	590	367
Policy 56: Provision of Public Open Space in New Development	a) and 4.512	Supports the overarching approach to the provision of public open space however the policy would benefit from a clearer distinction between the provision of open space and the provision of formal sport and recreation / perceived overlap between policies 56 and 57; Minor amendments should also be made to the allotments and community garden sections of the policy.	579	438
Policy 56: Provision of Public Open Space in New Development	a)	Suggests alternative categorisation for allotments and community gardens	579	438
Policy 57: Sport and Recreation Facilities	n/a	Supports te overarching objective of the policy, but it should be applied flexibly and in accordance with the most up-to-date evidence	579	438
Policy 57: Sport and Recreation	n/a	Sport England support the policy	212	309
Policy 57: Sport and Recreation Facilities	4.535	East Hampshire District Council note that the expectation that all future provision should be designed to be multi-purpose may not be realistic.	581	143
Policy 58: Renewable Energy Infrastructure	n/a	Suggest that policy could go further / faster in relation to gas boiler upgrade targets and options for renewable technologies. However, agricultural land should not be used for Solar PV.	493	310
Policy 58: Renewable Energy Infrastructure	b)	South Downs National Park Authority request a minor modification to the policy, to clarify it refers to National Parks.	589	239
Policy 59: Employment and Skills Plans	n/a	Welcomes and supports this policy. Some developers have their own apprenticeship intiatives therefore it is suggested that wording is amended to include such intiatives.	579	438
Policy 59: Employment and Skills Plans	n/a	The objective of the policy is supported, however the requirement for an Employment and Skills Plan for all commercial development above 2,000 sqm has not been adequately justified. Evidence should be provided to support the threshold. Policy amendments proposed.	563	388
Policy 60: Community New Development Officers	n/a	An indication of the level of contribution an/or ratio of officer to development should be provided within the policy to assist developers.	579	438
Policy 60: Community New Development Officers	n/a	The policy does not meet the tests set out in CIL regulations or national policy. Policy should be deleted.	565	268
Appendix 2	n/a	Consider Southleigh Specific transport-infrastructure monitoring trigger is needed	429, 430, 432 and 433	355
Appendix 2	n/a	Request New Lane Specific Transport monitoring indicator	429, 430, 432 and 433	355
Omissions	n/a	Land at St Mary's Road (Rook Farm) is suitable and available for development and should be allocated in the Local Plan	562	325
Omissions	n/a	There should be a BMV land policy	544	310
Omissions	n/a	Land at Castleman's Lane should be reassessed	570	440
Omissions	n/a	The allocation of Land at Waterlooville Golf Club is requested. Proposed wording.	595	453
Duty to cooperate	n/a	Gosport Borough Council support for continuing work on strategic cross boundary issues, including close collaboration in sub-regional environmental mitigation.	582	176
Duty to cooperate	n/a	Portsmouth City Council welcomes HBC's proactive engagement with neighbouring authorities and supports ongoing discussions with other authorities within the Portsmouth Housing Market Area.	588	252
Duty to cooperate	n/a	Portsmouth City Council notes that it owns Allocations 13 (Cabbagefield Row) and 14 (Strouden Court). Portsmouth households a need for social housing can be accommodated in Havant, making affordable housing a strategic cross-boundary issue by both authorities.	588	252
Duty to cooperate	n/a	Winchester City Council welcomes the considerable work to address Havant Borough's unmet housing need, including looking for opportunities within the wider and Solent devolution area.	592	002
Duty to cooperate	n/a	Winchester City Council support the commitments from Portsmouth City Council and Fareham Borough Council to accommodate Havant Borough's unmet economic development needs.	592	002
Duty to cooperate	n/a	South Downs National Park Authority support HBC's continued liasion with neighbouring authorities to ensure that cross-boundary strategic issues are fully addressed	372	239
Duty to cooperate	n/a	The Council should produce a Statement of Common Ground with Southern Water (in context of Allocation 2)	528	314
Duty to cooperate	n/a	Concern that there has been insufficient cross-boundary working in relation to assessing transport impacts, strategic wildlife corridors and the impact on the South Downs National Park (in context of Allocation 2)	410	446
Duty to cooperate	n/a	Bats are not recognised as a cross-boundary strategic issue with Chichester District (in context of Allocation 2)	297	016
Infrastructure Delivery Plan (IDP)	n/a	The IDP should contain commitments to improve routes that are non-compliant with DfT 1/20 Cycle Infrastructure Design statement (as identified in the (LCWIP)	564	204
Infrastructure Delivery Plan (IDP)	n/a	HCC as LHA suggest that the southleigh South West Bridge Link should be reflected in IDP	583	144
Infrastructure Delivery Plan (IDP)	n/a	West Sussex suggest a number of projects for inclusion in the IDP	591	425

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Infrastructure Delivery Plan (IDP)	n/a	National Highways notes that the IDP identifies the transport requirements but, as a live document that should be kept updated	585	238
Infrastructure Delivery Plan (IDP)	n/a	Welcomes the approach taken in determining the infrastructure requirements set out in the Primary Care chapter of the Infrastructure Delivery Plan, and recognise the Council has engaged with the ICB on this matter.	572	164
Infrastructure Delivery Plan (IDP)	n/a	The ICB identifies a need for update to the Infrastructure Delivery Plan, Developer Contributions Guide and viability evidence to identify, cost and test healthcare infrastructure requirements associated with planned growth. The Coucil should identify the ICB's Health Contributions for GP Infrastructure – Technical Note for Developers, as a relevant evidence document for assessing development-related primary care infrastructure requirements and for informing planning obligations	587	245
Infrastructure Delivery Plan (IDP)	Southleigh	The ICB anticipates that the healthcare mitigation required will be for a minimum of 290m² additional GMS space, which could be achieved through a new build, on-site healthcare facility and/or the extension of existing local GP premises, to be funded by the developer through a S106 contribution.	587	245
Infrastructure Delivery Plan (IDP)	Southleigh	the IDP should set out the costed funding package and secured/anticipated funding sources for the Southleigh bridge, primary school and sewerage phasing referred to in the development requirements	429, 430, 432 and 433	355
Infrastructure Delivery Plan (IDP)	Southleigh & Employ	The IDP should recognise explicitly that resolving New Lane's cumulative highway impact and delivering the strategic relief that Southleigh's own access strategy depends upon may be the same underlying infrastructure need, and consider the two together rather than as unrelated items.	429, 430, 432 and 433	355
Infrastructure Delivery Plan (IDP)	Southleigh	Request further clarification on the evidence base underpinning the assumptions that inform the requirements and associated development costs in the IDP	579	438
Infrastructure Delivery Plan (IDP)	Long Copse	The required bus enhancement under criterion e. and the improvements to LCWIP route 372 under criterion s. of Allocation 2: Long Copse Lane are not identified in the Infrastructure Delivery Plan.	295	016
Infrastructure Delivery Plan (IDP)	Long Copse	The IDP relies on a Transport Assessment which is described as outstanding and on mitigation proposals which are not a definitive solution and require further site specific testing.	295	016
Infrastructure Delivery Plan (IDP)	Long Copse	The Infrastructure Delivery Plan does not identify a wastewater capacity uplift at Thornham	298	016
Infrastructure Delivery Plan (IDP)	Long Copse	The IDP does not contain information about site specific infrastructure - clarification sought on education. See original rep.	299	016
Infrastructure Delivery Plan (IDP)	Campdo	The IDP should set out the costed infrastructure and off-site mitigation mechanisms for Campdown	429, 430, 432 and 433	355
Strategic Flood Risk Assessment (PfSH SFRA)	n/a	Strategic Flood Risk Assessment (SFRA) is out of date as the highest ever tide recorded occurred on 9th April 2024 causing great damage in coastal areas of Hayling Island,	564	204
Strategic Flood Risk Assessment (PfSH SFRA)	3.2.15	Disagree with SFRA approach not to define Flood Zone 3b (Functional Floodplain) associated with the sea	564	204
Strategic Flood Risk Assessment (Local Plan Sites)	n/a	If the Sequential test has been conducted and it has found that all sequentially preferable sites are on the mainland, then the Plan must state that this is the legal basis for the decision not to make housing allocations on Hayling Island.	564	204
Strategic Transport Assessment (STA)	n/a	National Highways accepts the strategic findings of the TA (but more detailed analysis and discussionis needed at planning application stage). On the basis of the evidence base NH do not consider it likely that there would be severe residual impacts on the safe and efficient operation of the SRN.	585	238
Strategic Transport Assessment (STA)	n/a	STA should confirm that cumulative highway capacity implications of continuing intensification at New Lane – including under Allocations 26 and 27 – have been tested against current capacity at the following SRN-approach junctions (Emsworth Road/Southleigh Road/Pook Lane; Horndean Road/Bartons Road; Horndean Road/Southleigh Road).	429, 430, 432 and 433	355
Strategic Transport Assessment (STA)	n/a	Concern that West Sussex County Council have not been engaged in the Strategic Transport Assessment and the impacts of the development on the West Sussex network.	295	016
Strategic Transport Assessment (STA)	n/a	The Long Copse Lane site was assessed for 260 dwellings rather than the 325 dwellings identified by the allocation. Concern that the strategic model is not sufficiently detailed to identify site specific impacts on Long Copse Lane, and cross boundary impacts with West Sussex. It does not take the quality and safety of local walking and cycling routes into account.	295	016
Strategic Transport Assessment (STA)	n/a	The transport evidence does not address the relationship between the Long Copse Lane allocation, northern Emsworth and Westbourne Primary School.	528	314
Strategic Transport Assessment (STA)	n/a	Emsworth Residents Forum consider that the Council's strategic transport modelling fails to simulate accurately the severe traffic congestion that Southleigh will impose. Cumulatively, the plan forces an unsustainable volume of vehicles onto the already constrained local network. The impact on the local network with the link road has not been modelled. The STA also fails to take into full account of the cross-boundary impacts, since it incorporates only the new developments within Southbourne and not those further east in the A259 corridor. The traffic modelling falls short of what is required since its basic underlying assumption on achieving a significant modal shift, is flawed.	305	287
Full Plan Viability Assessment	Assessment of Policy 16	Further explanation is needed as to how the cost (5% above current standards (Part L 2021) used in the viability study was arrived at. There will also be additional costs associated with this. Further evidence is needed to demonstrate that this policy will not impact on the delivery of new homes in Havant.	565	268
Full Plan Viability Assessment	n/a	Overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, concern that without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely, rendering development unsustainable.	572	164
Full Plan Viability Assessment	n/a	The viability study should be updated to reflect the Retirement Housing Group guidance in respect of viability of older persons housing.	574	448
Strategic Housing and Economic Land Availability Assessment	WA05	The SHELAA does not identify any overriding constraint. See submission.	595	453
n/a	n/a	The evidence does not show that there are strong reasons for restricting development under NPPF para 11.	595	453
Sustainability Appraisal (SA)	n/a	Natural England notes that the Sustainability Appraisal identifies Development Strategy Option 2 as the preferred approach and welcomes that Option 2 would provide positive effects for biodiversity, climate change, healthy communities, natural resources and landscape.	385/586	040
Sustainability Appraisal (SA)	n/a	Unclear how paragraph 11 of the NPPF has been applied in relation to higher growth options (sites on Hayling Island and other sites discounted through the SHELAA). The Council has not considered whether higher growth options (Options 3 and 4) would demonstrably and significantly outweigh the benefits of the additional development.	565	268
Sustainability Appraisal (SA)	n/a	The Council should adopt the Active Travel England target to get walking, wheeled and cycling to 55% of short stage journeys by 2035.	564	204
Sustainability Appraisal (SA)	Assessment of EM01 and EM02	The SA has not assessed all reasonable alternatives. Strategy options were not based on the selection or rejection of particular sites, so no option was ever tested excluding individual sites such as Long Copse Lane. The SA does not test allocated sites against the minimum density standards. The SA should test a reasonable alternative that applies minimum density standards to the distribution of housing, including whether accessible urban sites could achieve more housing.	300	016
Sustainability Appraisal (SA)	Assessment of EM01	It is not clear how criterion 8a (protect and enhance valued landscapes) has influenced site selection. Negative effects were identified for four sites including EM01 and EM02, but these were all carried through to site selection. Query what landscape evidence was used to inform this assessment.	273, 274; 301; 564; 487; 515, 524, 575	020; 204; 16; 196; 024, 201

Policy or Matter	Detailed Ref	Matters Raised	Representation Number	Representor Number
Sustainability Appraisal (SA)	Assessment of EM01 and EM02	Emsworth Residents Forum do not consider the site selection to be justified. SA gives a negative appraisal on transport criteria, but it was selected to go forward to take a very large housing allocation. The evidence is not clear as to why other sites were discounted on grounds which are broadly similar to the constraints present on the Long Copse Lane site but with better accessibility and not within the setting of the National Park.	306	287
Sustainability Appraisal (SA)	Assessment of EM08a	SA says that sites with significant doubt over whether adverse effects can be mitigated should not be allocated. The February 2026 SHELAA specifically said that suitable compensatory habitat had not been demonstrated. Site should not have been allocated if this was yet to be resolved.	553	365
Sustainability Appraisal (SA)	Assessment of EM08a	Flaws in SA and contradictions between information presented in tables and that in the text of the report; exceptional circumstances not discussed in SA	522; 527	024
Sustainability Appraisal (SA)	n/a	The SA 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.	595	453
Habitats Regulations Assessment	n/a	Natural England: See SoCG	385, 586	040
Habitats Regulations Assessment (HRA)	n/a	The HRA states that all harms can be mitigated and therefore IROPI are not required. However, this is not credible and ignores case law on HRA.	564	204
Habitats Regulations Assessment (HRA)	n/a	Infrastructure development is required before any housing allocations are built out. This suggests that allocations should be phased in line with capacity improvements at WWTW.	564	204
Habitats Regulations Assessment (HRA)	Assessment of	The Habitat Regulations Assessment for Long Copse Lane does not fully assess the effects on Bechstein's bats	288, 297	300, 016
Habitats Regulations Assessment (HRA)	Assessment of	Discrepancies identified in Appendix 3 in relation to the nutrient demand of the development/Western Streams catchment.	298	016
Habitats Regulations Assessment (HRA)	Assessment of	The impact of the Long Copse Lane alongside other existing, approved and proposed developments should be assessed.	155	121
Habitats Regulations Assessment (HRA)	Assessment of	Concern that the allocation is screened as likely having a significant effect on the Singleton & Cocking Tunnels SAC through loss of bat habitat, but does not assess that effect.	297, 261	16, 092
Habitats Regulations Assessment (HRA)	Assessment of	The Habitats Regulations Assessment of the plan must be capable of concluding, with certainty, that there will be no adverse effect on the integrity of these European sites.	291	379
Habitats Regulations Assessment (HRA)	Assessment of	The HRA notes ecological impacts / HRA should have resulted in removal of this allocation	564, 273	204, 020
Habitats Regulations Assessment (HRA)	Assessment of EM08a	The inspector should ensure that HBC demonstrate clearly that the HRA has considered the effects of allocating EM08a, including effects in combination with other development, recreational disturbance and the function of the wider network of supporting habitat.	553	365
Development Strategy Topic Paper	Paragraph 1.14 Topic Paper	The Council only quotes part a and does not reference part b of NPPF paragraph 11. Where there are no footnote 7 constraints, then the Council must consider part ii and whether any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of meeting needs when assessed against the policies in the Framework. No statement could be found setting out how paragraph 11 had been applied when establishing how much development can be delivered.	565	268
NPPF 2026	n/a	Questions regarding continued relevance of plan in light of NPPF 2026; The new NPPF will be a material consideration in assessing planning applications immediately and may necessitate a review of forthcoming policies within this emerging plan.	554, 574, 565	393, 448, 268

Appendix 3: Overview of responses received under Regulation 20 from Prescribed Bodies

Statutory Body	Representation No(s)	Representor Number	Statement of Common Ground
Hampshire and the Solent Combined County Authority	*Response received confirming they would not be responding*	n/a	No
Environment Agency	465, 467, 468, 469, 470, 471, 473, 496	231	SCG011
Historic England	584	005	SCG007
MMO	None received	n/a	No
Natural England	385/586	40	SCG015
Network Rail	401	79	No
National Highways	585	238	SCG013
Chichester DC	580	424	SCG006
East Hants DC	581	143	SCG016
South Downs NPA	369, 370, 371, 372, 374	239	SCG002
Winchester CC	592	002	SCG003
West Sussex CC	591	425	No
Hampshire CC	583	114	SCG014
IoW Council	None received	n/a	No
Portsmouth CC	588	252	SCG009
Gosport BC	582	176	SCG005
Fareham BC	None received	n/a	SCG010
PfSH	None received	n/a	No
Hampshire Constabulary	None received	n/a	No
Rowlands Castle Parish Council	None received	n/a	No
Horndean Parish Council	None received	n/a	No
Westbourne Parish Council	None received	n/a	No
Southwick & Widley Parish Council	None received	n/a	No
Denmead Parish Council	None received	n/a	No
Newlands Parish Council	None received	n/a	No
Southbourne Parish Council	287	442	No
Emsworth Residents Forum	305,306,307	287	No
Stoughton Parish Council	None received	n/a	No
West Thorney Parish Council	None received	n/a	No
Virgin	None received	n/a	No
BT	None received	n/a	No
Mobile UK	None received	n/a	No
Hampshire and Isle of Wight ICB	587	245	In progress
Scottish & Southern Electricity Networks	None received	n/a	No
Southern Gas Networks	None received	n/a	No
Southern Water	590	367	SCG012
Portsmouth Water	None received	n/a	SCG004
Homes England	None received	n/a	No
Sport England	211, 212	309	SCG008
Langstone Harbour Board	1	43	No

Chichester Harbour Conservancy	457	241	In progress
Pegasus Group, on behalf of Arqiva	None received	n/a	No

Environment Agency (EA)	
Representor Number:	**231**
Representation Numbers:	**465, 467, 468, 469, 470, 471, 473, 496**

Summary of Statutory Body's Regulation 20 Representation

The EA explicitly expresses support for the following strategic and topic policies in the Building a Better Future Plan, considering the Council's approach to be legally compliant and sound:

- Policy 1 - Development Strategy
- Policy 4 - Infrastructure and Environmental Mitigation
- Policy 11 - Climate Change
- Policy 19 - Water Efficiency
- Policy 27 - Flood Risk
- Policy 51 - Aquifer Source Protection Zones
- Policy 52 - Contaminated Land

The EA also commented on Allocation 3: Land South of Havant Road (Horse's Field), requesting wording changes to recognise the main rivers at the site.

Havant Borough Council's Response

The Council welcomes the support expressed by the Environment Agency, in particular in relation to the development strategy, and the plan's approach to flood risk and climate change.

Proposed modifications to Allocation 3 have been agreed between the two bodies.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes – SC011

Historic England	
Representor Number:	**005**
Representation Number:	**584**

Summary of Statutory Body's Regulation 20 Representation

Historic England confirms that comments on the Regulation 18 stage draft Local Plan largely have been addressed in the current Publication version.

Historic England welcomes the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. Historic England considers that the key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF view, in respect of the elements that relate to the historic environment (paragraph 196) have been met.

Overall Historic England is satisfied that no issues remain that are likely to affect the soundness of the Local Plan.

Havant Borough Council's Response

Havant Borough Council welcomes the positive joint working that has taken place to agree appropriate policies for the Local Plan.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG007

Natural England	
Representor Number:	**040**
Representation Number(s):	**385/586**

Summary of Statutory Body's Regulation 20 Representation

Natural England recognises the progress made by the Council since the Regulation 18 consultation and appreciates the constructive engagement that has taken place throughout the plan's preparation.

Natural England provided comments on the following areas:

- Recreational Disturbance
- Solent Wader and Brent Goose Strategy
- Water Quality Effects in International Sites
- Development on the Coast
- Green and Blue Infrastructure
- Local Nature Recovery Strategy (LNRS) and Connecting People to Nature
- Habitat Regulations Assessment
- Sustainability Appraisal

Natural England are supportive of the policies in the plan and raised no soundness or legal compliance issues. They have recommended some minor wording changes to strengthen policies.

Havant Borough Council's Response

Havant Borough Council welcomes the positive joint working that has taken place to agree appropriate policies for the Local Plan. The Council will continue to engage with Natural England through the Local Plan process.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes – SCG015

Network Rail	
Representor Number:	**079**
Representation Number(s):	**401**

Summary of Statutory Body's Regulation 20 Representation

Network Rail made representations on Policy 4: Infrastructure and Allocations 1, 2, 6, 8, 29 and 30, confirming they consider the plan sound and legally compliant in relation to these policies.

Network Rail welcomes the inclusion in the relevant site allocations of criteria which relate to safeguarding the operational safety of the railway line.

Network Rail supports in Policy 4 and Allocation 1 the safeguarding of land for a new bridge over the railway to the South West of Southleigh (Allocation 1). They consider the new bridge to be an important piece of infrastructure to alleviate pressure on, and use of, the Warblington level crossing to enable the site allocation to be delivered. Network Rail confirms that they contributed to document IT07 - Southleigh S-W bridge feasibility study within the Local plan evidence base.

They also support recognition in Policy 4 of Havant railway footbridge and Warblington railway footbridge. These pieces of infrastructure provide opportunities to increase accessibility over the railway.

Havant Borough Council's Response

The Council welcomes the support expressed by Network Rail.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

No

National Highways	
Representor Number:	**238**
Representation Number(s):	**585**

Summary of Statutory Body's Regulation 20 Representation

National Highways generally supports the Publication Plan's overarching policies relating to the Vision, Development Strategy and Objectives, which seek to enable sustainable development and to support improvements to infrastructure in the borough. NH considers that the collection of general overarching polices are well-developed and defined.

National Highways considers that Policy 53: Accessibility, Transport and Parking sets out appropriate assessment requirements for planning applications, and that the IDP identifies the transport requirements but, as a live document, that it should be kept updated as further evidence emerges.

National Highways also confirm that they accept the strategic findings of the Strategic Transport Assessment (TA) but highlights that more detailed analysis and discussions needed at planning application stage. On the basis of the evidence base NH does not consider it likely that there would be severe residual impacts on the safe and efficient operation of the SRN.

National Highways suggests amended policy wording for a number of allocations to flag proximity of sites to the SRN, or alternatively an amendment to Policy 53: Accessibility, Transport and Parking

Havant Borough Council's Response

The Council welcomes the support for the Plan Strategy and approach to transport from National Highways, and their involvement in the production of the Strategic Transport Assessment.

Amendments to Policy 53 have been agreed between HBC and NH to cover potential impacts from sites close to the SRN (see Statement of Common Ground).

Both parties recognise that the need remains for further detail and refinement as developments come forward as planning applications. HBC and NH (together with the Local Highway Authority) will continue to work together as development schemes come forward. In this context both parties also agree that the IDP is a living document, which needs to be kept updated as further detailed evidence comes to light in relation to transport infrastructure needs.

Is there a Statement of Common Ground?

Yes – SCG013

Chichester District Council	
Representor Number:	**424**
Representation Number(s):	**580**

Summary of Statutory Body's Regulation 20 Representation

Chichester District Council generally support the Publication Local Plan. CDC also acknowledge Havant's unmet housing need, and do not object to the plan on that basis.

CDC express concern in relation to Allocation 3: Land South of Havant Road (Horse's Field) due to its inclusion within National Landscape, but do not consider it gives rise to any cross-boundary impacts.

Havant Borough Council's Response

HBC welcome CDC's support for the Plan.

HBC note CDC's concerns in relation to Allocation 3 but agree that the allocation is not a cross boundary strategic issue.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG006

East Hampshire District Council	
Representor Number:	**143**
Representation Number(s):	**581**

Summary of Statutory Body's Regulation 20 Representation

East Hampshire District Council (EHDC) remain concerned about the significant level of unmet housing need arising through the Havant Local Plan. It is acknowledged that the scale of unmet housing need is largely a result of substantial increases in housing requirements, and that HBC has sought to maximise housing delivery within the constraints of its administrative area.

EHDC note that Policy 7 (Amount of Employment) is unclear whether Havant is now meeting its employment need in full or whether part of the requirement continues to be accommodated by a neighbouring authority.

Finally, EHDC recommend that the high need for gypsy and traveller pitches and travelling showpeople plots in neighbouring authorities is recognised.

Havant Borough Council's Response

HBC note EHDC's concerns about the high level of unmet housing need and welcomes acknowledgement that HBC has sought to maximise housing delivery within its area.

The forthcoming Housing Supply Topic Paper provides an explanation of the Council's calculation of unmet housing need. Unfortunately, timings did not allow for publication of this paper prior to consultation, but some of its contents were shared on an informal basis with EHDC during the consultation period.

Due to the late receipt of the Employment Land Review Update 2026, it was not possible to fully reflect the discussions with Portsmouth City Council and Fareham Borough Council in Policy 7 or its supporting text. However, the transfers of employment land between neighbouring authorities have been formalised through the Statement of Common Ground between the South East Hampshire Local Authorities.

Is there a Statement of Common Ground?

Yes – SCG016

South Downs National Park Authority	
Representor Number:	**239**
Representation Number(s):	**369, 370, 371, 372, 374**

Summary of Statutory Body's Regulation 20 Representation

South Downs National Park Authority (SDPNA) support HBC's continued liaison with neighbouring authorities.

SDNPA highlight the need to safeguard, maintain, enhance connections/corridors between the protected landscapes of the South Downs National Park and Chichester Harbour National Landscape in relation to:

- Policy 4 (Infrastructure and Environmental Mitigation to Support Development);
- Allocation 1 (Southleigh);
- Allocation 2 (Long Copse Lane) and
- Allocation 6 (Land east of Castle Avenue).

In addition, SDNPA highlight that there should be clarity that such connections and corridors do not conflict with proposed access arrangements for Allocation 1 and vice versa. Modifications are suggested to the respective criterion in the listed policies (with the exception of Allocation 2 which is supported).

Havant Borough Council's Response

HBC welcomes SDNPA's support on continued cooperation with neighbouring authorities.

HBC will consider the proposed modifications to Policy 4 and Allocations 2 and 6 alongside the other representations received in consultation with the SDNPA.

Is there a Statement of Common Ground?

Yes - SCG002

Winchester City Council	
Representor Number:	**592**
Representation Number(s):	**002**

Summary of Statutory Body's Regulation 20 Representation

Winchester City Council support the considerable work that has been undertaken to address Havant Borough's unmet housing, particularly HBC looking for opportunities within the wider Hampshire and Solent devolution area.

WCC also acknowledge the efforts being made to accommodate Havant's economic development needs in nearby areas and note the commitments secured from Portsmouth City Council and Fareham Borough Council.

Havant Borough Council's Response

HBC welcomes WCC's support for the work that it has undertaken to address its unmet housing need, particularly the engagement undertaken with authorities in the Hampshire and Solent devolution area.

HBC is also pleased that WCC supports its approach to accommodating its employment needs.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG003

West Sussex County Council	
Representor Number:	**591**
Representation Number(s):	**425**

Summary of Statutory Body's Regulation 20 Representation

West Sussex County Council (WSCC) has no comments regarding the soundness of the Plan. However, to support the delivery of infrastructure required to accommodate planned growth and to ensure that appropriate developer contributions can be secured, WSCC recommends that a number of schemes are included within the Infrastructure Delivery Plan (IDP).

Havant Borough Council's Response

The Council will consider inclusion of the schemes in the next review of their IDP.

Is there a Statement of Common Ground?

No

Hampshire County Council	
Representor Number:	**114**
Representation Number(s):	**583**

Summary of Statutory Body's Regulation 20 Representation

The County Council provided a response as the Local Highway Authority, Lead Local Flood Authority Minerals and Waste Planning Authority. They had also provided a response to the Regulation 18 consultation in July 2025, and subsequently engaged with the Borough Council in finalising policy wording prior to the pre-submission stage.

The regulation 19 representation highlights:

- The adoption of the Minerals and Waste Plan in July 2026 (for any cross references)
- A discrepancy between Policy 28 – Drainage, criterion b) and Policy F8 of the 2026 NPPF, as the latter requires systems to be designed in accordance with the National Standards for Sustainable Drainage Systems.
- In relation to Allocation 1 – Southleigh:
    - The County Council has not provided technical comment or advice on the deliverability of the bridge as set out in criterion k, but supports the principle of the project, with a solution to be delivered by the developer. An updated Infrastructure Delivery Plan should identify the preferred infrastructure solution.
    - The County Council also strongly supports a comprehensive masterplan-led approach to the delivery of Southleigh, recognising the multiple land ownerships in this allocation site, and the bridge connection beyond to the safeguarded land in Policy 4 and Allocation 6 (Land East of Castle Avenue)

The only soundness issue identified is in relation to Allocation 18 - Padnell Grange, where the County Council consider it unclear whether a viable drainage solution can be delivered.

Havant Borough Council's Response

The Council welcomes the positive engagement that has taken place between the two councils in the preparation of the Local Plan.

The Council will take into consideration the County's comments in relation to transport infrastructure for Southleigh in the next review of their IDP.

Proposed modifications to Allocation 18 have been agreed between the two bodies.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes – SCG014

Portsmouth City Council	
Representor Number:	**252**
Representation Number(s):	**588**

Summary of Statutory Body's Regulation 20 Representation

Portsmouth City Council (PCC) generally supports the Plan and welcomes HBC's proactive engagement with neighbouring authorities in addressing Havant Borough's unmet housing need.

The two Councils have worked together to make a number of updates to Policy 7: Amount of Employment to note that a reduced transfer of employment land from PCC.

PCC also support HBC's approach to the natural environment.

Havant Borough Council's Response

HBC welcomes PCC's support and is also pleased to see recognition of the collective discussions which have taken place on unmet housing need. Detail of this work is set out in SD1 Statement of Cooperation.

HBC has worked collaboratively with PCC to develop proposed modifications to Policy 7 which is appended to the Statement of Common Ground.

HBC notes PCC's support for its approach to the natural environment.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG009

Gosport Borough Council	
Representor Number:	**176**
Representation Number(s):	**582**

Summary of Statutory Body's Regulation 20 Representation

Gosport Borough Council (GBC) generally support HBC's approach to meeting housing needs and acknowledge that HBC has engaged with neighbouring authorities and a wider geography to try to resolve unmet need.

Havant Borough Council's Response

HBC welcomes GBC's support for its approach to meeting housing needs and the engagement it has undertaken with neighbouring authorities in order to address unmet housing need. Detail of this work is set out in SD1 Statement of Cooperation.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG005

Southbourne Parish Council	
Representor Number:	**442**
Representation Number(s):	**287**

Summary of Statutory Body's Regulation 20 Representation

Inclusion of Allocation 3 (and the associated change in wording of Policy 30) is not 'sound' as it is in fundamental conflict with the National Planning Policy Framework – specifically Paragraphs 188-190

The presumption of refusal of applications within the Chichester Harbour AONB (now National Landscape) should have prevented the inclusion of the Horses Field site in the Local Plan housing land allocation without evidence of 'exceptional circumstances'. No such evidence has been provided.

The inclusion of the Horses Field site also fails the test of legal compliance in that it was only included at the last minute (May 2026) and was therefore not part of the earlier consultation on the Draft Plan. Interested parties have not been afforded the normal opportunity to consider and comment on the inclusion of this site, as required by law.

Inclusion of the Horses Field site within the Havant Local Plan housing site allocation, and any successful application that followed, would set a precedent that would undermine the ability of Chichester District Council (and Inspectors on appeals) to refuse future speculative applications for major housing developments within the National Landscape areas of Southbourne Parish.

Havant Borough Council's Response

See Council's response to Main Issue 5.

Is there a Statement of Common Ground?

No

Emsworth Residents Forum	
Representor Number:	**287**
Representation Number(s):	**305, 306, 307**

Summary of Statutory Body's Regulation 20 Representation

Emsworth Residents Forum object to:

- Allocation 1: Southleigh
- Allocation 2: Long Copse Lane
- Allocation 3: Land south of Havant Road (Horse's Field)

Please see the Main Issues 3-5 in the main body of the report for further detail.

Havant Borough Council's Response

See Council's response to Main Issues 3-5.

Is there a Statement of Common Ground?

No

Hampshire and Isle of Wight Integrated Care Board (ICB)	
Representor Number:	**245**
Representation Number(s):	**587**

Summary of Statutory Body's Regulation 20 Representation

The ICB welcomes sustainable housing growth, however, stresses that this requires supporting infrastructure that is planned and delivered alongside new development. In summary, the ICB considers the Plan to be unsound due to a lack of clear mechanisms to assess and mitigate impacts on primary healthcare infrastructure.

Several existing GP surgeries in the Borough operate beyond capacity (Emsworth Medical Practice; Blossom Health, Havant; Homewell Curlew Practice; Bosmere Medical Practice) and funding is required to enable additional infrastructure provision.

In respect of Policy 12 (Health) ICB considers that the Policy does not satisfactorily addresses Healthcare access; GP capacity; NHS estate infrastructure; the role of the ICB in assessing impacts; and planning obligations for healthcare mitigation. The ICP requests that this Policy requires early engagement for major development.

In respect of Policy 4 (Infrastructure), the ICB requires that healthcare infrastructure is considered an essential infrastructure, with development-related healthcare impacts being mitigated through Section 106 agreements where legal tests are met, and that developers' contributions may fund GP surgery extensions, reconfiguration, new facilities or land provision.

The ICB's strongest objection relates to Allocation 1: Southleigh and focuses on the lack of specific healthcare infrastructure requirement despite likely demand on local GP services. ICB notes that the developer has not engaged with the ICB regarding healthcare provision in order to provide the required 290m² of additional GP floorspace.

Requested Main Modifications include:

1. Recognition of healthcare infrastructure as essential infrastructure.
2. Formal recognition of the ICB as a key infrastructure provider.
3. Amendments to Policy 12 to include access to healthcare.
4. Stronger Health Impact Assessment requirements and early ICB engagement.
5. Explicit support for healthcare-related Section 106 contributions.
6. A specific healthcare infrastructure requirement for Southleigh.
7. Updates to the IDP and viability evidence to include healthcare projects.
8. Recognition of the ICB's GP Infrastructure Technical Note as a key evidence document.

Havant Borough Council's Response

The Council notes that no representation was received from the ICB for the Reg 18 consultation. Engagement with the ICB took place in order to update the Council's Infrastructure Delivery Plan earlier in 2006. The Council will work with the ICB to address concerns raised at Reg 19.

Is there a Statement of Common Ground?

As of November 2026 a SoCG is in progress

Southern Water	
Representor Number:	**367**
Representation Number(s):	**590**

Summary of Statutory Body's Regulation 20 Representation

Southern Water confirms it assessed wastewater network capacity and infrastructure constraints for the proposed housing allocations at Regulation 18 and thanks the Council for making the agreed amendments to the plan before Regulation 19.

In respect of Allocation 3: Land South of Havant Road (Horse's Field), following an assessment Southern Water confirms there is a limited capacity in the local sewerage infrastructure to accommodate the proposed development. The allocation should include a requirement stating that occupation may need to be phased to align with sewerage infrastructure delivery.

In respect of Policy 55: Protecting Open Space the current wording could unintentionally restrict delivery of essential utility infrastructure, such as pumping stations (water and wastewater infrastructure often has specific locational requirements because it must connect into existing networks) In accordance with the NPPF and Planning Practice Guidance, Southern Water contends that essential utility infrastructure can constitute a justified exception in protected areas and recommends that a new criterion to Policy 55 permitting development is added, such as "for the purposes of essential utilities infrastructure (where no reasonable alternative site is available)."

In relation to the proposed Water Recycling Plant (WRP) site for their Water Recycling Project, Southern Water have reviewed the policy provisions in the Local Plan in relation to this land and are satisfied that these do no present obstacles to the development of the WRP. That is with the exception of Policy 55, where Southern Water questions why the proposed WRP site has been designated as Protected Open Space, and request that this designation be removed from the Policies Map.

Havant Borough Council's Response

The Council is content to proposed modifications to Allocation 3 and to remove the proposed Water Recycling Plant from land protected under Policy 55.

However, the Council does not consider that the additional criterion proposed by Southern Water would be beneficial – this matter is noted as an outstanding area of disagreement in the Statement of Common Ground.

Is there a Statement of Common Ground?

Yes – SCG012

Portsmouth Water	
Representor Number:	**n/a**
Representation Number(s):	**n/a**
Summary of Statutory Body's Regulation 20 Representation	
No representation received.	
Havant Borough Council's Response	
n/a	
Is there a Statement of Common Ground?	
Yes - SCG004	

Sport England	
Representor Number:	**309**
Representation Number(s):	**211, 212**

Summary of Statutory Body's Regulation 20 Representation

Sport England made two simple representations on the Regulation 19 consultation:

- Policy 12: Health: Sport England welcomes reference to its Active Design Guidance in the section setting out how the policy will be implemented.
- Policy 57: Sport and Recreation Facilities: Sport England are satisfied with the wording of the policy and the supporting justification.

Havant Borough Council's Response

The Council welcomes the positive engagement that has taken place on proposed policy wordings throughout the development of the local plan.

No matters of disagreement remain outstanding.

Is there a Statement of Common Ground?

Yes - SCG008

Langstone Harbour Board	
Representor Number:	**43**
Representation Number(s):	**1**

Summary of Statutory Body's Regulation 20 Representation

Langstone Harbour commented on Policy 29: Development on the Coast. They consider there is no reason the restrict the number of moorings or berths, or intertidal structures such as jetties and slipways in Langstone Harbour.

Havant Borough Council's Response

The Council is content to propose amendments to Policy 29, to remove reference to Langstone Harbour (retaining Chichester Harbour only) in the relevant part of the policy and the supporting text (criterion c) iii of the policy and paragraph 4.277of the supporting text).

Is there a Statement of Common Ground?

No, but agreement reached on proposed modifications to address the Harbour Board's concerns, by exchange of emails, October 2026.

Chichester Harbour Conservancy	
Representor Number:	**241**
Representation Number(s):	**457, 501**

Summary of Statutory Body's Regulation 20 Representation

Allocation 3 (The Horse's Field) is not sound because it was introduced without adequate consultation and would permit major development within the Chichester Harbour National Landscape without sufficient justification. The Conservancy considers that the allocation conflicts with national policy, the statutory duty to further the conservation and enhancement of National Landscapes, and could harm landscape character, biodiversity and settlement separation.

To make the Local Plan legally compliant and sound, the Conservancy requests the deletion of Allocation 3 and a consequential amendment to Policy 30, replacing "other than where allocated within this Local Plan or where it can be demonstrated that there are" with "other than in".

Policy 30 is not legally compliant or sound due to wording been added in May 2026, allowing development allocated in the Local Plan within the National Landscape, was not subject to proper public consultation and therefore undermines the plan's legal compliance.

The revised policy weakens protections for the National Landscape to facilitate Allocation 3 (The Horsefield), contrary to national planning policy. Major development in a protected landscape should not be allocated unless exceptional circumstances have first been demonstrated.

Havant Borough Council's Response

See Council's response to the Main Issue 5.

Is there a Statement of Common Ground?

As of November 2026 a SoCG is in progress

Appendix 4: Overview of site specific Regulation 20 responses from Landowners and Site Promoters

Site Allocation	Representation Received from	Representation Number (s)	Representor Number
Allocation 1: Southleigh	White Peak Planning OBO Bloor Homes and Landowners	579	438
	Henry Adams OBO the Stride family	499	449
Allocation 2: Long Copse Lane	Henry Adams LLP OBO CALA Homes / Soloway	596-609	454
Allocation 3: Land south of Havant Road (Horse's Field)	Turley on behalf of Markfield Investment Ltd	578	443
Allocation 4: Helmsley House	None	None	None
Allocation 5: Southleigh Park House	None	None	None
Allocation 6: Land East of Castle Avenue	Henry Adams LLP OBO BDW Trading Ltd (c/o Barratt David Wilson Homes Southampton)	439	567
Allocation 7: Former Oak Park School	Gillings Planning OBO Perseus Land and Developments	445	506
Allocation 8: Palk Road	SLR Consulting Ltd OBO Bellway Homes	526, 576	444
Allocation 9: Belmont Castle Rest Home, 18-20 Portsdown Hill Road	None	None	None
Allocation 10: Land South of Lower Road (Phase 2)	None	None	None
Allocation 11: Kingscroft Farm	None	None	None
Allocation 12: Portsmouth Water Headquarters	None	None	None
Allocation 13: Cabbagefield Row	None	None	None
Allocation 14: Strouden Court	None	None	None
Allocation 15: Land West of Hulbert Road	None	None	None

Allocation 16: Dunsbury Way	None	None	None
Allocation 17: Former Electricity Board, Bartons Road	None	None	None
Allocation 18: Padnell Grange	ECE Planning OBO Stonebond Properties (Guildford) Limited	259	441
Allocation 19: Blue Star	Savills OBO Grainger PLC	404	450
Allocation 20: Goodwillies Timber Yard	None	None	None
Allocation 21: West of Waterlooville MDA (Phases 4 and 8)	Savills OBO Grainger PLC	523	450
Allocation 22: South Downs College Car Park	None	None	None
Allocation 23: Campdown	None	None	None
Allocation 24: Waterloo Park	Hargreaves Management Ltd	563	388
Allocation 25: Dunsbury Park	None	None	None
Allocation 26: Former Colt site	None	None	None
Allocation 27: Gas Holder site, Downley Road, New Lane	None	None	None
Allocation 28: Langstone Park	NWS Planning OBO XLB Property Ltd	573	437
Allocation 29: Interbridges East	None	None	None
Allocation 30: Interbridges West	None	None	None
OMISSION SITES	**Representation Received from**	**Representation Number (s)**	**Representor Number**
HI16 Rook Farm	Gladman Developments Ltd	562	325
HI5 Land adj to Havant Road and Castlemans Lane	Henry Adams OBO Doswell	570	440
WA05 Waterlooville Golf Club	Lambert Smith Hampton OBO Waterlooville Golf Club	595	453