BUILDING
A BETTER FUTURE

Housing Site Allocations Topic Paper

November 2026



Havant
BOROUGH COUNCIL

Housing Site Allocations Topic Paper

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1. Introduction

1.1 Paragraph 23 of the 2024 National Planning Policy Framework (NPPF) states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

1.2 The Council has determined which sites should be allocated for development in the Local Plan following national guidance. This assessment process was undertaken in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and then refining that list through the Sustainability Appraisal (SA).

1.3 The purpose of this paper is to set out the Council's methodology to site selection and how sites were subsequently taken forward as site allocations in the Publication Building a Better Future Plan. It goes onto consider the deliverability of the larger site allocations in the Plan. It accompanies the Development Strategy and Housing Supply Topic Papers.

2. Site selection methodology

National Policy Context

2.1 NPPF Paragraph 72 indicates that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

2.2 Planning Practice Guidance (PPG) indicates that the purpose of an assessment of land availability is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment does not however, in itself determine whether a site should be allocated for development but instead provide information on the range of sites that are available to meet that local authority's requirements. An assessment should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

2.3 The Council's methodology to the assessment of land availability is set out below.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

2.4 The Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) provides a site-by-site assessment of land that is available to meet development needs. It provides a high-level assessment of which sites in the Borough are suitable and available for development, and whether development is achievable on that site. Where these three criteria are met, a site is determined to be 'developable.' The assessment does not, however determine whether a site should be allocated. The SHELAA was updated and reviewed in February 2026, and again to support the Publication Regulation 19 Plan in June 2026, informed by monitoring data with a base date of 1 April 2025.

2.5 Section 3 of the SHELAA sets out the PPG recommended methodology, through five stages and a list of core outputs. It provides a narrative of how the Council has worked through these five stages and demonstrates the rigorous approach undertaken to produce the core outputs which are contained within the appendices to the SHELAA.

2.6 Through the Appendices, the SHELAA summarises the core outputs required by the PPG. Individual sites are assessed in detail grouped by outstanding planning permissions (Appendix 2). This element of supply has a base date of 1 April 2025 and is described under 'Sites with Planning Permission' in the Housing Background Paper.

2.7 Sites and broad locations identified during 'Stage 1: Site / broad location identification' are then thoroughly considered through a robust assessment, the results of which are presented within individual site proformas: Broad locations (Appendix 3); Developable SHELAA Housing sites (Appendix 4); Developable Housing Sites (Appendix 5); Developable economic development sites (Appendix 6); and Discounted economic development sites (Appendix 7). Where sites are concluded to be suitable, available and achievable, they have been concluded to be 'Developable' consistent with the definition of Annex 2 in the NPPF.

2.8 Table 2 in Section 3 of the SHELAA lists the likely site constraints, impacts and considerations in which sites and broad locations are assessed to determine their suitability. This is reflected in the 'Suitability' assessment within the individual site proformas in Appendices 3, 4 and 5, considering potential policy changes which may impact on the suitability of the site / broad location. This included an assessment of whether it was possible to address or overcome the identified site constraints in the context of the constrained land supply, and whether there is a reasonable prospect that a suitable form of development could still be achieved. Section 4 of the Housing Background Paper sets out the Council's approach to the calculation of site yields in the context of the likely shortage of land.

2.9 Sites have been concluded to be 'Available' where there is a developer or landowner who has expressed an intention to develop the site, and there is confidence that there are no legal or ownership impediments to the development. Following the previous Local Plan Inspectors' concerns regarding deliverability of sites, this followed a rigorous process which involved re-establishing the availability of sites with landowners and/or site promoters. The individual site proformas document when and by whom sites have been promoted by, including whether this was a landowner, and/or a developer. Where there is an identified developer and/or housebuilder on board, then there is greater confidence about the deliverability of the site.

2.10 An assessment of 'Achievable' has been made based on the prospects of that a particular type of development being developed on the site at a particular point in time. This is in part a consideration and judgement on the economic viability of the site, having regard to the site constraints and whether technical constraints can be addressed within the limits of viability, and secondly the capacity of the developer to complete and let or sell the development over a certain period. This has been informed by engagement with landowners and developers throughout the plan making process, and where relevant, discussions with development management officers where there are pre-application discussions, or current planning applications to provide a realistic and objective assessment of the likely delivery timescales and phasing.

2.11 Where there is no developer on board, but the landowner has provided an indication of delivery timescales, these have been compared with the delivery timescales for a site of its scale in the Lichfield's Start to Finish research (Third Edition)[1]. Whilst it is acknowledged that the timescales provided within this research are averages, the study provides a useful indication of the 'planning to delivery' period particularly for sites coming forward from years 6-10 onwards.

[1] https://lichfields.uk/media/w3wjmws0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf

Hampshire Country Council has also published research on housing delivery trends in Hampshire[2] which also provides a broad indication of average time of start to finish of sites.

2.12 The summary of housing and economic land supply at section 4 of the SHELAA sets out an overview of supply. It demonstrates that even if all the land is identified as available for housing and economic development were to be developed, there would still be a significant shortfall in each area. This is of course, before sites are considered in relation to the development strategy and subject to SA, so the shortfall is likely to be greater.

The Development Strategy and Sustainability Appraisal

2.13 The development strategy in the Local Plan sets out the strategic direction and local priorities for the use of land and development in the Borough to 2043. It guides the pattern, quantity and quality of development during the plan period.

2.14 A total of four potential development strategies were considered through the Sustainability Appraisal, covering a broad spectrum from a full environmental and brownfield development focus to a full housing delivery focus with few environmental considerations. These are set out in more detail in the Sustainability Appraisal (See SP003-D, Appendix B Strategy Options (summary)).

2.15 Strategy Option 2 represents the proposed development strategy and reflects Table 5 in the Draft Local Plan. However, crucially, none of the options demonstrate that it is possible to achieve delivery of the total need for housing, as set out under the standard method. As such, whichever development strategy option was selected, the need for housing development will not be met by a wide margin.

2.16 The chosen development strategy combines and balances key national and local objectives in the most effective way and overall represents an appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. Flood risk is identified as a key constraint and on this basis greenfield land on Hayling Island is not being put forward for development. Due to the risk to the single access road on and off the island, this includes greenfield sites which may not themselves be at risk. There is more information regarding this in the Development Strategy Topic Paper (TP01).

Housing Land Supply in the Pre-Submission Building a Better Future Plan

2.17 Taking this strategy and the available development land in Havant Borough into account, Policy 5 in the Publication Building a Better Future Plan shows the housing capacity for the Borough from 2022 to 2043. Table 5 and the trajectory appended to the Plan provide a detailed breakdown of the sources of housing land supply included in the Draft Building a Better Future Plan. This indicates that a total housing supply of 7,087 dwellings between 2022 to 2043 which results in a realistic capacity figure for Havant Borough equivalent to 337 dwellings per annum.

[2] Housing delivery trends in Hampshire 2000-2030 *Analysis of key trends on sies of 100-399 dwellings* https://www.hants.gov.uk/landplanningandenvironment/facts-figures/land-supply

2.18 As set out in the Housing Supply Topic Paper, it is appropriate to use a shorter period for calculating housing need (2025-2043) using the standard method, compared to the plan period (2022-2043) because it is a forward-looking assessment of housing need. As of April 2025, there remains a supply of 5,908 dwellings to be delivered by the Plan. With the unmet need allowance of 345 from the adopted Winchester District Local Plan 2020-2040, this increases to 6,253 dwellings. This is set out in detail in the Housing Supply Topic Paper.

2.19 Against an objectively assessed need figure of 15,822 dwellings, the Borough therefore has an unmet need figure of 9,566 dwellings. Whilst acknowledging that this represents a very high level of unmet need the Council has left no stone unturned to identify sites that are suitable for housing and has engaged in effective cooperation with its neighbouring authorities in respect of unmet housing need. This is set out in detail in Section 5 of the Housing Background Paper.

2.20 When assessing whether sites should be allocated in the Local Plan, the Council has always sought to do so within the context of the high level of unmet need. As such, the Council has looked to ensure that wherever possible, the plan sets out an approach to overcome constraints as opposed to considering constraints a ‘showstopper’ to allocation. As will be set out through this topic paper, this has led to allocations with substantial planning constraints, infrastructure improvements, which will substantially change the character of the Borough and – in one case – are within a National Landscape.

3. Key site allocations

3.1 The site allocations which are specifically covered in this topic paper are as follows:

- Allocation 1: Southleigh – 2,100 dwellings
- Allocation 2: Long Copse Lane – 325 dwellings
- Allocation 3: Land south of Havant Road (Horse's Field), Emsworth – 85 dwellings
- Allocation 23: Campdown – 590 dwellings

3.2 These sites form a large source of supply in the housing trajectory and include the largest three sites within the plan. As such, collectively and individually, they constitute a large proportion of the housing supply which the plan provides for. A complete list of housing site allocations can be found in Table 5 of the Publication Plan.

3.3 To be considered developable, Annex 2 of the NPPF indicates that:

"Sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

3.4 The following section provides a brief description of each site, and considers key constraints in the context of suitability, the availability of the site in terms of whether there is a developer or housebuilder on board, considering any relevant planning history before considering achievability of the site.

Allocation 1: Southleigh

3.5 Southleigh is allocated for 2,100 dwellings through Allocation 1 in the Publication Building a Better Future Plan. Southleigh was proposed for allocation for comprehensive development in the previous Local Plan, prior to its withdrawal from examination. It is not allocated in the development plan.

3.6 This site is identified under SHELAA reference BL05, with separate site promotions under HA04, HA05, HA22 and HA27 respectively. The site proforma identifies the site as being within predominantly agricultural use, with residential development to the east and west, with the historic Southleigh Park House along Bartons Road to the north. The site slopes gently from north to south. The A27 and the railway line run along the south of the site.

3.7 Southleigh Road in Denvilles runs along the west of the site before bisecting the site to meet Horndean Road in Emsworth to the east. There are a number of existing dwellings on Eastleigh Road, which runs north-south through the middle of the northern part of the site.



Suitability

3.8 The identified site constraints from the SHELAA are as follows:

- Parts of the site are at risk of fluvial flooding, which can be avoided for built development.
- There are also protected trees and sewer lines that would need to be avoided.

3.9 As a greenfield site of scale, it will be expected to deliver significant infrastructure. This includes the provision of a new walking, cycling and public transport bridge over the railway to connect the site directly with the Emsworth Road/A27 Warblington junction in accordance with criterion k) iii) of Allocation 1.

Availability

3.10 The majority of the site has been promoted by Bloor Homes on behalf of the majority landowner over a number of years under SHELAA reference HA04.

3.11 This part of the site is currently subject to planning application reference APP/26/00324 as of June 2026:

"Outline planning application, with all matters reserved except for means of vehicular access to the public highway and associated highway improvements, for: the demolition of existing buildings; the erection of new residential dwellings (C3); a Local Centre (comprising local retail (E(a)), financial and professional services (E(c)(i), E(c)(ii), E(c)(iii)), restaurants, cafés, and drinking establishments (E(b) and Sui Generis), hot food takeaways (Sui Generis), medical services (E(e)), offices (E(g)(i)) and community facilities ((E(d)), E(f), F2(b), F2(c))); a Primary School (F1(a)); early years provision (E(f)); informal and formal public open space including community park; community food-growing space; Active Travel routes; drainage infrastructure; utilities infrastructure; and all other associated and necessary infrastructure."

3.12 SHLEAA reference HA05 has been promoted for development separately. Whilst there remain parts of the site not being actively promoted, comprehensive development is expected to be achieved.

3.13 The Council has since established the availability of these sites in correspondence with the individual landowners. These are presented within individual site proformas alongside the assessment of BL5 at Appendix 3 of the SHELAA. It is acknowledged that these individual land ownerships may be delivered beyond the end of the plan period and this is reflected in the housing trajectory.

Achievability

3.14 The site is proposed for allocation in the Council's Pre-Submission Local Plan, which is by far the largest site in the plan and represents an opportunity to develop a new community. The site is largely in a consolidated landownership which Bloor Homes are promoting on behalf of the landowner. Though it should be noted that there are a number of other landowners, the site is expected to come forward as a comprehensive development in a series of phases. Bloor Homes has already undertaken a series of masterplan workshops in consultation with consultees under a Planning Performance Agreement and has undertaken engagement with Hampshire County Council as Local Highways Authority.

3.15 It should also be noted that there is a legal agreement on the site which will need to be varied in order for the site to come forward for development. It should be noted that this agreement has been varied multiple times in recent years to allow for other sites to come forward for development, several of which are now complete. As such, this is not considered a barrier to deliverability. Bloor Homes has submitted a separate Deed of Variation application alongside their current planning application.

3.16 The Lichfields Start to Finish research (Third Edition)[3] indicates that for a scheme of this size - the average time to obtain detailed consent is 5.1 years (with outline consent achieved in a little over 3 years) and a further 1.5 years to first dwelling completion (Figure 3.1). On the basis of the current application, timescales indicate that outline consent could be reasonably be obtained by early 2029. Allowing a further 2 years for detailed consent by early 2031, and a lead in timescale of 1.5 years to first completion would indicate that first dwelling completions would be achieved on site by mid 2032. Though it is acknowledged that the timescales set out in the Lichfields' report are averages and site specific circumstances and lead ins on site can vary significantly.

3.17 The below table assumes completions based on 50 dwellings for each outlet per year. Bloor Homes have indicated that this site is likely to be 2 or 3 sales outlet site (minimum) given the separate areas and likely need to construct an internal spinal road early in the site's delivery. This allows for a maximum of 150 dwellings per annum from year 2033/34 onwards.

Phasing and delivery in years								
2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
					50	100	150	150
2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
150	150	150	150	150	150	150	150	1650

[3] https://lichfields.uk/media/w3wjmws0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf

Allocation 2: Long Copse Lane

3.18 Long Copse Lane is allocated for 325 dwellings through Allocation 2 in the Publication Building a Better Future Plan. A smaller site area, known as Land north of Long Copse Lane was proposed for allocation in the previous Local Plan. This reflected the site boundary for a previous planning application on the site which is considered further below. The site does not benefit from an allocation in the development plan.

3.19 This site is identified under SHELAA references EM01a & EM01b (western site) and EM02a & EM02b (Main Site) (Revised) respectively. The site proforma indicates that this greenfield site lies to the north of Long Copse Lane in northern Emsworth close to the boundary with Chichester District and West Sussex County. There is existing residential development to the south of the site, while Southleigh Forest extends to the north and beyond to the west. The main part of the site is predominantly open fields, surrounded by trees and hedgerows, and is currently used as grazing land and horse paddocks. Whilst the western part of the site comprises scrubland open field, surrounded by trees and hedgerows.



Suitability

3.20 The key constraints identified from the SHELAA are as follows:

- There is a woodland TPO in the northwest of the site and Southleigh Forest SINC bounds the north west corner of the site. The site is also adjacent to ancient woodland.
- Bechstein bats are known to occur locally and use the site and adjacent habitats.
- The site is in close proximity to the South Downs National Park. In landscape terms development of the site would introduce buildings to open countryside north of Emsworth, albeit not beyond the current eastern edge of the built form of Emsworth.

Woodland TPO, SINC and ancient woodland designations

3.21 The presence of the woodland TPO, Southleigh Forest SINC and ancient woodland adjacent to the site influence the character of the site. As set out in the accompanying Housing Background paper (see TP002: Appendix 3 Housing Density Analysis), at this stage no detailed assessment has yet to be undertaken by the site promoter. Ecological constraints and TPO woodland are however, acknowledged to constrain the available developable area though detailed work has yet to be undertaken. Given development will be expected to retain and integrate the existing woodland and other protected and notable trees on site, it is expected that the layout will need to include woodland buffers, as well as landscape buffers to provide an appropriate transition between the development and the undeveloped area beyond.

Replacement habitat

3.22 Bechstein bats are a protected and notable species within Havant Borough and are known to use the site. There is a need for the development proposals to provide appropriate and proportionate mitigation, compensation and enhancement measures. The site layout of the previous planning application reference APP/21/00893 included large buffers between the development and adjacent forest habitats, in addition to the creation of a 1.5-hectare off-site replacement habitat. In this respect, any development proposals will need to demonstrate that they have followed the mitigation, compensation and enhancement hierarchy as set out in Policy 23 (Protected and Notable Species).

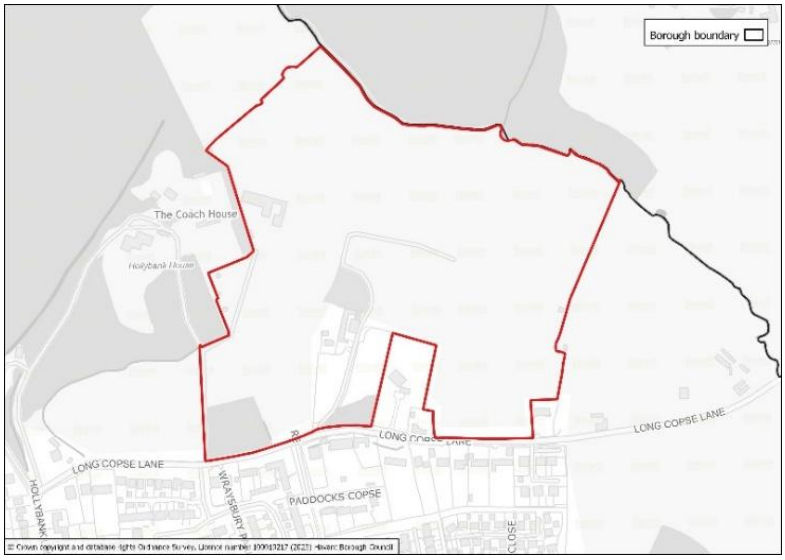
Impact on the setting of the National Park

3.23 The site lies within the setting of the South Downs National Park. The Council has an agreed Statement of Common Ground with the South Downs National Park Authority which indicates that both authorities are committed to bringing forward this site in a way which avoids or minimises any potential adverse impacts on the South Downs National Park as per paragraph 189. The SDNPA were consulted in drafting amendments to the allocation requirements (Allocation 2).

Availability

3.24 The site has been promoted for development over a number of years. Though there are several landowners with land interests in the allocation – in the past, EM02a & EM02b were represented by a single site promoter (Land & Partners).

3.25 The site was subject to an outline planning application reference APP/21/00893 for the erection of a new residential scheme (C3 use of approximately 210 dwellings) which was submitted by Land & Partners in August 2021 but was later withdrawn in June 2025. Though the reasons for withdrawal were not given, an outstanding key issue was to demonstrate that environmental mitigation for nutrient neutrality was achievable as there are not currently any private sector mitigation schemes to serve the Western Streams. For reference a red line of the 2021 application site is provided below.



3.26 More recently, a wider site area for EM02 has been submitted through the Council's Call for Sites. This is considered in detail below.

3.27 Allocation 2 in the Publication Building a Better Future includes site references EM01a & EM02b and EM02a & EM02b respectively reflecting the different landownerships. These are shown on the map below.


EM02b
EM02b
EM02a
EM01b
EM01a
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EM01a & EM01b

3.28 EM01 was promoted as a single site in 2022. More recently, the site has been promoted by two separate private landowners – denoted by EM01a and EM01b in the Council's SHLEAA. There is no known developer or housebuilder on board for either of these landownerships and it did not form part of outline planning application reference APP/21/00893. Nonetheless, given the clear development interest in the adjacent land (EM02a & EM02b) and consistent promotion of the land, there is a reasonable prospect that the land will come forward for development within the lifetime of the Plan.

EM02a & EM02b

3.29 The majority of EM02 – the same site boundary as application site reference APP/21/00893 was promoted through the Council's Call for Sites 2022. However, through the Draft Local Plan consultation in 2025, the site was promoted separately by two landowners – denoted by EM02a and EM02b respectively – with additional fields to the north west also promoted for housing.

3.30 As of October 2025, the site promoters of EM02a indicated that a new development partner was being sought following the withdrawal of planning application reference APP/21/00893. Henry Adams LLP obo Cala Homes / Soloway made representations at Regulation 19 stage, though no formal Call for Site submission has been received to date and the Council will be undertaking further engagement with the site promoter on this matter in due course.

Achievability

3.31 With the main site (EM02a and EM02b) now being promoted by two separate site promoters and the withdrawal of the previous planning application, the site is considered to be at the early stages of delivery.

3.32 The need for suitable environmental mitigation for protected species and nutrient neutrality is acknowledged to have a likely impact on viability – though there can be confidence that a mitigation for protected species can be provided, given the previous planning application demonstrated that this could be achieved through a combination of on and off-site measures and the applicant at the time reporting no viability challenges. In terms of nutrient neutrality, there is not yet any private sector mitigation available on the market to serve the Western Streams catchment though there is known to be schemes in the early stages of development. As such there is considered to be a reasonable prospect that there will be a suitable mitigation scheme to serve the development in the next 6-10 years. Furthermore, Government are in the process of introducing Environmental Delivery Plans (EDP), which will cover a number of environmental mitigation areas, including nutrient neutrality. Whilst there is not an EDP which covers any part of the Borough at this time, this represents a further mechanism which can be used to ensure the deliverability of new housing.

3.33 There is clear developer interest given the recent planning history on the site and it is considered likely to be an attractive location for developer.

3.34 Given the early stage of the development process, first completions are currently phased to commence during 2033/34.

3.35 The western part of the site has been promoted separately by landowners (EM01), but there are not currently any housebuilders on board. This part of the site is expected to come forward in the latter part of the plan period, as there will be increasing market confidence with the main part of the site coming forward for development.

Phasing and delivery in years								
2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
						30	50	50
2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
50	50	50	45					325

3.36 In December 2025, the site promoter of EM02b reaffirmed that land to the northeast of EM02a was available for development and indicated that a proposed site yield of 250 – 275 dwellings but this has yet to be evidenced in the form of any site-specific constraint analysis. Nevertheless, any development on the site will be expected to meet the Council's emerging density standards unless it is demonstrated that there are site-specific constraints and local character which justify a different approach. EM01a & EM02 has a site yield of 50 dwellings. The combined site (EM01a & EM01a and EM02a & EM02b) is therefore allocated for a total of 325 dwellings.

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

3.37 This 3.55ha site comprises fields which are currently used for equestrian purposes, with stables located in the south-west corner. The site is identified under SHELAA reference EM08a. The site forms a part of a larger site, comprising of further two parcels to the south (EM08b), however, these parcels do not form part of this allocation (EM08a).

3.38 Existing residential development is located adjacent to the site to the north and east. The A259 runs along the north boundary.

3.39 The site is allocated for 85 dwellings in the Publication Building a Better Future Plan.

3.40 The first section considers the suitability, availability and achievability of the development, the second section focuses on national landscape considerations.



Suitability

3.41 This greenfield site lies next to development to the east and north (beyond the A259). The site lies within but on the edge of the Chichester Harbour National Landscape. Appropriate form of development must include adequate landscape buffer(s) and/or other forms of mitigation in order to conserve and/or enhance the natural beauty of the National Landscape. The suitability of the site is further assessed under separate headings below and in the concluding paragraph.

3.42 There are pockets of flood zones 2 and 3 on southern and south-eastern boundaries. In addition, the Environment Agency has confirmed in there reg 19 consultation response that main rivers are within/adjacent to the site draining into or part of the Nore Farm Stream.

3.43 Suitable mitigation for the impacts of development on the adjacent Solent Wader and Brent Goose Strategy site would be required.

3.44 There are protected trees and sewer lines within the site that would need to be avoided.

3.45 The site is adjacent to Brook Farm SINC and Conigar Point Meadows SINC. There is high archaeological potential for presence of peripheral elements of the Warblington Villa complex located immediately to the west. Nevertheless, there is a reasonable prospect that a suitable form of development can be achieved, subject to appropriate mitigation.

Availability

3.46 The site has been promoted for a number of years and has been available for development since.

Achievability

3.47 The site promoter has expressed their willingness to deliver the site in the early parts of the Plan period (0-5 years), given the fact that ecological and landscape assessments have been undertaken and informed an initial masterplan. However, at this stage, there is no live planning application and to the Council's knowledge, no development partner has been brought on board yet. Therefore, a more conservative view is taken, and the site is predicted to provide first completions on site in the period of 2034/2035. However, once a development partner is confirmed and a planning application is submitted, there may be increasing confidence about the site's delivery and the delivery timescales might be adjusted.

Phasing and delivery in years								
2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
								30
2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
30	25							85

National Landscape Duty

3.48 Section 85(A1) of the Countryside and Rights of Way Act 2000 sets out the duty on all public bodies in respect of carrying out their functions that will affect an area of outstanding natural beauty as follows:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

3.49 As a result of amendments made by the Levelling-up and Regeneration Act 2023, this duty has recently been enhanced. The duty was previously to 'have regard to' the purpose of conserving and enhancing the National Landscape. Guidance published by Defra states that relevant authorities need to apply the duty in the preparation of development plans. Areas of outstanding natural beauty (AONB) are still referred to as such in legislation but have recently been rebadged in planning policy as National Landscapes.

3.50 The Defra guidance goes on to say: 'for development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible.' The term Protected Landscapes includes National Landscapes.

3.51 A case on this enhanced duty (*CPRE Kent v SoS for Housing, Communities and Local Government*[4]), which was a challenge to the grant of planning permission for housing in a National Landscape, establishes the following key principles:

[4] [2025] EWHC 1781 (Admin)

- the duty requires authorities to consider whether the planning decision in question would be consistent with purpose of conserving or enhancing the natural beauty of the National Landscape;
- where the authority concludes that proposed development will, at least, not result in harm to the natural beauty of the National Landscape, then that will suffice to conclude that granting permission for that development complies with the duty; but
- even if the authority finds that the development will cause planning harm to the National Landscape, it is not obliged to refuse permission on this basis alone. Rather, it will lawfully discharge the duty if it considers whether permission ought to be granted in light of the harm identified and explains why granting permission is justified. This, in turn, may involve addressing how the harm caused by the proposed development can be mitigated (eg through conditions or planning obligations) or if compensatory measures are available which might offset the harm.

3.52 Whilst this case is about the grant of planning permission, it provides useful guidance to apply to plan making. In particular, it demonstrates that National Landscape is a constrained that needs to be carefully considered rather than a halt to residential development. It will remain relevant when determining an application for planning permission.

3.53 There have been a limited number of other cases where housing need weighed in favour of granting planning permission for housing in a National Landscape[5] showing that, for example, a pressing need for housing as a matter of principle may override the landscape protection that National Landscape policy normally provides (although only where there is a limited availability of alternative sites outside the National Landscape in the LPA's area, hence this does not apply in all cases).

Plan-making policies in the National Planning Policy Framework (2024)

3.54 Paragraphs 189 and 190 refer to National Landscape and set out how development within the National Landscape should be dealt with. Paragraph 189 refers to plan-making, paragraph 190 refers to decision-making process and is fundamental in assessing planning applications.

3.55 Both paragraphs align with the legislative requirements set out above and set out that great weight should be given to conserving and enhancing landscape and scenic beauty. The NPPF confirms that National Landscapes have the highest status of landscape protection, which also includes the conservation and enhancement of wildlife and cultural heritage, and so the scale and extent of development within this designation should be limited.

Decision making policies in the NPPF 2024 and NPPF 2026

3.56 It is acknowledged that paragraph 190 of the NPPF (2024) will no longer be relevant when determining planning application(s) on this site. Instead, the revised NPPF (2026) will be applicable. However, it is noted that the policies in the revised NPPF (2026) relevant to development in National Landscape are not materially different from the policies contained in the previous Framework to make the allocation ineffective.

[5] See for example *R (Cotswold District Council) v Secretary of State for Communities and Local Government* [2013] EWHC 3719 (Admin)

3.57 Paragraph 190 clarifies that planning permission for major development should be refused, other than where there are exceptional circumstances and where it can be demonstrated to be in the public interest. At planning application stage, an assessment of major development must consider the following:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Major development in the National Landscape

3.58 Whether or not something is 'major development' for the purposes of paragraph 190 of the NPPF is defined as being 'a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined' (footnote 67).

3.59 The allocation is not a strategic development site consisting of a large development requiring a supporting infrastructure, such as facilities and services, education, employment and leisure provisions. However, having regard to its setting, scale, nature and whether it could have a significant adverse impact on the purposes for which the National Landscape area has been designated or defined (footnote 67 of the NPPF 2024), it is considered to constitute a "major development".

Management Plans

3.60 Turning to the National Landscape management plan, the Defra guidance referenced above also says, when seeking to further the purposes, relevant authorities 'should consider the information contained in a Protected Landscape's Management Plan'. The PPG also contains a section on management plans, as follows:

Do planning policies and decisions need to take account of management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty?

Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty do not form part of the statutory development plan, but they help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.

3.61 As such, it is acknowledged that the Management Plan itself is capable of being a material consideration in plan-making and decision-taking. The Chichester Harbour Management Plan has been prepared by the Chichester Harbour Conservancy on behalf of its four constituent local authorities, including Havant Borough Council.

3.62 The NPPF is also a material consideration. What weight is given to the Management Plan and the NPPF respectively is a matter for the decision maker to decide and justify.

3.63 There is no requirement for the Management Plan policies to be consistent with the NPPF, as it is not a development plan document. Any inconsistencies must be considered, weighted and justified by the decision maker. In this particular case, the Council has not formally adopted the Management Plan at this point as it is not considered to align with the NPPF (either 2024 or 2026) and is working with the Chichester Harbour Conservancy to update the current draft so that it can be adopted.

3.64 It is noted however that the proposed allocation would not comply with the current draft of the Chichester Harbour Management Plan.

Amenity Area

3.65 The allocation site is located within the Amenity Area of the Chichester Harbour National Landscape. The Amenity Area is defined in the Chichester Harbour Conservancy Act of 1971. There are numerous provisions in the 1971 Act that affect the amenity area. The main points are:

- The key provision is in section 21(1) which says *'It shall be the function of the Conservancy, subject to the provisions of this Act, to take such steps from time to time as to them seem meet for the conservancy, maintenance and improvement of (a) the harbour....; (b) the amenity area for the occupation of leisure and recreation and the conservation of nature; and the facilities... afforded respectively therein or in connection therewith.'* This provision was included by the Conservancy in their consultation response.
- Section 22 gives the Conservancy the power (in exercise of their functions under the Act) to carry out various activities on the amenity area including the provision of accommodation, houses, buildings, structures etc *'as the Conservancy may think necessary or expedient for the purposes of the Act or the enjoyment of the harbour or the amenity area or any facilities provided for those purposes'.*
- However, note that the powers in s22 *'shall not authorise the Conservancy or any company, body or person (a) on land in which any other person has an interest without the consent of such last-mentioned person, to do anything which apart from this section would be actionable at his suit by virtue of that interest'* (s22(4)). This demonstrates that the Conservancy cannot carry out these activities without the landowner's consent.
- The Conservancy has the right to acquire land within the harbour or amenity area for the purpose of or in connection with any of their functions (either by agreement or using compulsory purchase powers).
- Section 30 gives the Conservancy all the powers of a County Council in respect of a long list of enactments. These are broadly to do with the expected kinds of activities that might be found in an amenity area (provision of nature reserves, tree planting, country parks, camping, picnics etc) but the Conservancy have to get the consent of that county council before they carry out the action.

- Finally, the Conservancy can make/repeal byelaws for securing various things (good and orderly conduct, preventing nuisances and 'offences against decency', preventing damage to land or property of the Conservancy, preserving flora and fauna etc). There do not appear to be any published byelaws that govern activities in the amenity area.

3.66 Based on the map included in the Management Plan showing the extent of the amenity area, Horse's Field represents an extremely small part of the total amenity area, though is clearly within the area.

3.67 In conclusion, the fact that the site is within the amenity area does not confer any special status on the land other than the Conservancy having certain rights to 'take such steps from time to time as to them seem meet for the conservancy, maintenance and improvement of the amenity area' etc. CHC has been consulted on the plan and has responded comprehensively. Their powers over the amenity land as defined in the Act do not prevent its allocation for development or give the CHC any rights over that land that could stymie such allocation.

Exceptional Circumstances Assessment

3.68 The Council notes that the tests of Paragraph 190 apply “when considering applications for development within…national landscapes”. Nonetheless, the assessment below has been undertaken to consider the validity of an allocation for development, which sets the principal of development in any location. Nonetheless, this would need to be revisited in detail as part of the determination of any planning application, based on the specific elements of the submitted scheme.

3.69 As stated above, the policies in the revised NPPF (2026) relevant to development in National Landscape are not materially different from the policies contained in the NPPF (2024) to make the allocation ineffective. Therefore, the below considerations are considered relevant.

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

3.70 In summary, 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.

3.71 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.

3.72 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 the very constrained nature of the Borough (as set out in the Havant Borough Constraints Study, August 2024), this in itself would not provide sufficient housing land supply, even when applying higher densities, as set out in the emerging Policy 14: Housing Density.

3.73 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.

3.74 Under the duty to co-operate, 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 a high number 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.

3.75 In line with the Planning Practice Guidance and 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. One of those sites was the land south of Havant Road, which has been promoted by the landowner since 2022 but was discounted, primarily, due to its location in the National Landscape.

3.76 In November 2025, further supporting information was submitted by the site promoter to address the reasons for discounting the site and focusing built development on the northern and north-eastern portions of the site. The submission proposed that the site could accommodate a mix of housing types, including specialist accommodation for older people.

3.77 The submission addressed the points raised in the NPPF paragraph 190, drawing attention to the fact that: "*Failure to allocate additional sites will exacerbate unmet need, increase affordability pressures, and constrain economic growth."* It further suggests that the allocation of the site would help in reducing the shortfall, support the delivery of older persons' accommodation, and contribute to local employment during construction stage and beyond.

3.78 The submission was supported by landscape and ecological information which was reviewed by the Council's Landscape Officer and the Principal Ecologist. Subject to appropriate mitigation, no objection has been raised to allocating the northern parcel only. Further parcels located immediately to the south are not considered appropriate for allocation due to their ecological and landscape sensitivity.

3.79 Based on the Council's assessment, the site is allocated for 85 residential dwellings. In line with the emerging planning policies, 35% of the dwellings will be expected to be affordable housing.

3.80 In terms of impacts on economy, the site is a greenfield site and does not currently contribute towards the economy. The development of the site would give rise to positive impacts that would benefit the wider community. During the construction phase, the site would provide employment opportunities for local people. In accordance with the emerging policy Employment and Skills Plan, proposed development would be expected to provide opportunities for training and apprenticeship for local people.

3.81 During the occupation phase, the residents of the development would increase overall spending in the area boosting local business, shops and services as well as the vitality and viability of Emsworth town centre.

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way.

3.82 The Havant Borough Constraints Study (August 2024) concludes that the Borough is exceptionally constrained by being a subject to multiple competing constraints. These include landscape constraints, flood risk and ecology. Much of the land in the Borough has been already developed through previous local plan allocations leaving limited land for future development. Furthermore, the Council's Stage 2 of the Local Plan Viability Assessment Final Report (v1.4) (May, 2026) provides relevant detail regarding development finance, in particular in terms of brownfield sites and sites in Havant town centre. It concludes that, financially, these sites are challenging to develop and would likely be unviable if expected to meet in full all policy requirements (i.e. the provision of affordable housing).

3.83 Whilst, in searching for housing sites, the focus has been on brownfield sites first, in the context of the Council's housing need, this is no longer sufficient.

3.84 Other options of meeting the housing need have been extensively explored through ongoing discussions with the neighbouring authorities. However, they also face difficulties in meeting their housing needs due to being heavily constrained. Only Winchester City Council was able to allocate 345 dwellings in their Local Plan towards housing delivery in Havant. This is not sufficient to bridge the gap between the housing need and the housing supply. Therefore, the Council is unable to provide sufficient housing supply in other local administrative areas and a review of more sensitive sites had to be undertaken, in line with the guidance contained in the PPG.

3.85 The Council has assessed the allocation site as well as other sites located in the National Landscape, however, other sites have not been considered further due to harmful landscape and visual impacts and/or other constraints which make the sites unsuitable for residential development.

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

3.86 Whilst the Council has assessed the impact of development of the site in principle as part of its site assessment process, detailed assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated will be published in a forthcoming Landscape Assessment.

Conclusion

3.87 Using the standard methodology for calculating Havant's housing need, the Borough has a high housing need. The Borough has seen intensive development in the past decades leaving limited land suitable for further development. The Borough is also heavily constrained, which further restricts development options.

3.88 Brownfield land development in itself is not capable of providing the required housing supply. The Council has extensively explored other options to deliver housing, including through a duty to cooperate with other local authorities, which has not resulted in a significant and sufficient supply of housing units for this Plan period. Therefore, the Local Plan allocates greenfield sites, such as

Southleigh and Long Copse Lane for major residential development. However, these sites do not provide a sufficient number of homes to meet the housing need. As such, it follows that the options for housing delivery outside the National Landscape will not provide the required quantity of housing for the Borough. For this reason, sites within the National Landscape had to be reviewed within the SHELAA and Allocation 3 have been considered the only suitable option.

3.89 The landscape impacts as well as the opportunities the site can bring have been assessed. It is acknowledged that there will be harm arising from the development. However, in the context of the Council's housing need, the site can make a meaningful contribution towards meeting that need. The site will be expected to provide a policy compliant infrastructure, some of which will benefit the wider community. Appropriate landscape impact and ecological mitigation will be necessary to enable development on this site. The Council's considers that this can be achieved.

3.90 Drawing all the considerations together, on the basis of the information available, the Council is satisfied that its situation with regard to meeting its housing need represents exceptional circumstances and the development would be in the public interest, in accordance with NPPF paragraph 190. It is accepted that this test would need to be revisited as part of the determination of any planning application as the nature of impacts would be specific to the design of any particular scheme.

3.91 Having regard to the national policy, it is concluded that the benefits of the development would in principle outweigh the potential landscape and visual harm. In respect of its compliance with the enhanced AONB duty in s.85(A1) of the Countryside and Rights of Way Act 2000, the Council accepts that development of the site will result in some harm to the National Landscape but allocation for housing is justified on the basis of the Council's acute housing need and the effort made to find alternative locations for housing outside of the National Landscape. Ecological and landscape mitigation will be required for any development on the site to reduce the harm as much as possible.

Allocation 23: Campdown

3.92 Campdown is allocated for 590 dwellings through Allocation 23 in the Publication Building a Better Future Plan. Campdown was proposed for allocation in the previous Local Plan. It does not benefit from an allocation in the development plan.

3.93 This site is identified under SHELAA reference WA15. The site proforma identifies the location of this greenfield site as lying on the north slope of Portsdown Hill as it slopes down towards Crookhorn. It is also immediately south of the South Downs Campus of Havant and South Downs College (HSDC) and adjacent to the A3(M). It is used as grazing pasture with tree and hedgerow boundaries.

3.94 It is located adjacent to Allocation 22: South Downs College Car Park (SHELAA Ref WA14) which has resolution to grant planning permission reference APP/22/00439 for the redevelopment of the site to provide 85 dwellings.



Suitability

3.95 The key constraints identified from the SHELAA are as follows:

- The site has extensive archaeological remains that would constrain the amount of developable land.
- The entire site consists of Solent Wader and Brent Goose Strategy Primary Support Area or Secondary Support Area for the Chichester and Langstone Harbours SPA.
- An area in the southeastern end of the site lies in fluvial Flood Zones 2 and 3, though this is not expected to increase in the future.

Replacement habitat

3.1 The previous Local Plan Inspectors recognised that parts of the site are identified as a primary support area and secondary support area for Solent Waders and Brent Geese, and that the site has particular importance for Curlews. In that regard, Natural England previously expressed significant concerns as to whether its function could be adequately replaced elsewhere.

3.2 Details of a mitigation site forming part of Northney Farm have been submitted through planning application reference APP/25/00071 and an updated Call for Sites in December 2025. The submission refers to a letter dated 26th July 2024 from the landowners of Northney Farm which confirms their commitment to a Wetland Bird Habitat Mitigation and Management Plan (HMMP) submitted under planning application reference APP/23/00488. The updated Call for Sites submission (December 2025) also confirms that the landowners of Northney Farm have a signed option agreement with GRM Holdings Ltd and Trustees of George Gauntlett, which provides reassurance that the landowners consent to the use of their land for mitigation purposes and to the implementation of the agreed management plan. Whilst the application remains undetermined at the time of writing, Natural England has raised no objection to the proposals which are intended to serve as mitigation for the loss of SWBGS sites under planning application reference

APP/23/00488 subject to the appropriate mitigation being secured via appropriate planning condition and/or obligations.

3.3 The land is proposed to be safeguarded under Policy 4 (Infrastructure and environmental mitigation to support development) in the Publication Building a Better Future Plan.

Impact on Scheduled Monuments and their Setting

3.4 Separately, there are three Scheduled Monuments within and/or in close proximity to Campdown, notably that of a scheduled Roman villa and part of a Roman road. The previous Local Plan Inspectors' noted Historic England's advised that a Settings Study would need to be undertaken to fully assess the contribution of the setting of the of the Scheduled Monuments and their significance in order to demonstrate that development could be achieved on the site.

3.5 In response Purcell undertook a Heritage Statement & Setting Study[6] on the Council's behalf which included of the two College Road Potential Housing Sites: Campdown and South Downs College Car Park. The Study (S102) includes an assessment of the impacts on the setting and the significance of the scheduled monuments, capacity for change and importantly, mitigation measures which should be incorporated into the development proposals. The Mitigation Measures set out at Section 6.3 of this report have informed the allocation requirements in the Plan, which have been refined with consultation with Historic England to ensure that the Plan reflects a robust set out of measures to be incorporated into development proposals. These have been incorporated into the Allocation Requirements (Allocation 23), in consultation with Historic England.

Flood Risk

3.6 Whilst the southeastern end of the site lies in fluvial Flood Zones 2 and 3, the site includes large areas of open space and landscaping. As such, there is a reasonable prospect that a form of development can be achieved which avoids this part of the site.

Availability

3.7 The site has been promoted by the landowner (GRM Holdings Ltd and Trustees of George Gauntlett) and on behalf of Hampshire Homes over a number of years. During this time, there have been options with a number of development partners. Hampshire Homes submitted an updated Call for Sites in December 2025 which confirms the landowner is in the process of agreeing terms for a new partner to deliver the site.

3.8 The site was first subject to a hybrid planning application including full permission for 130 dwellings and outline permission for up to 650 dwellings reference APP/19/01101 which submitted by Persimmon Homes in 2019 which was later withdrawn following expiration of their option with landowner in 2023. At the time, no replacement habitat site had been identified, and it had not demonstrated that the quantum of development envisaged that the quantum of development could be achieved whilst respecting the Scheduled Monuments and their settings.

[6] https://www.havant.gov.uk/media/10199/download?inline

3.9 The site is currently subject to a revised planning application reference APP/23/00488 for mixed use residential development including 628 dwellings which was submitted by Dandara Southern Limited in June 2023 though Dandara are no longer actively pursuing the scheme. A revised planning layout was submitted in February 2025 for 590 dwellings, but the application description was not subsequently updated to reflect this.

3.10 As set out above, Hampshire Homes are currently in the process of agreeing terms for a new partner and the site is expected to come forward for development shortly. The applicant – now the site's landowners - continues to seek planning permission for the site through the current planning application.

Achievability

3.11 Through the site monitoring process, the landowner's planning agent has indicated that based on gaining planning permission in 2026, on-site infrastructure preparations in 2027, and delivery of houses in 2028. However, this does not account for any reserved matters approval or discharge of conditions. At this stage, the site promoter has not confirmed their preferred development partner, and with the potential need to submit a revised outline planning application will be required to be submitted, the Council is taking a conservative approach in estimating the likely timescales for the delivery of this site.

3.12 The Lichfields Start to Finish research (Third Edition)[7] indicates that for a scheme of this size - the average time to obtain detailed consent is 4.9 years. There is a further 'planning to delivery' period of 1.5 years. A revised outline planning application is assumed to be required (given that a new housebuilder is likely to have their own preferred form of development) tend to have their own preferred housing types). The average time is 2.9 years from validation to obtain outline consent, and a further 2 years to obtain detailed consent. On this basis, given that there is going to be a period of hiatus before a new development partner is brought on board (and it is already nearly the end of the current monitoring year 2026/27), first completions are currently assumed in years 6-10, with the bulk of the development delivered from year 11 and onwards. However, once a development partner is confirmed, there may be increasing confidence about the site's delivery.

Phasing and delivery in years								
2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
					28	75	75	75
2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	Total
75	75	75	75	37				590

[7] https://lichfields.uk/media/w3wjmws0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf

Conclusion

Havant has a high housing need. Development sites have been considered whether and how they should be allocated in the context of the housing need. There are a number of particularly constrained sites and the Council has carefully considered the constraints on those sites, whether and how they can be overcome. On balance, they are allocated with a number of criteria through those allocations.



Havant
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