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Havant Borough Local Plan Examination Statement

Matter 2: Housing



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This statement has been produced as part of the examination of the Havant Borough Local Plan. It answers the Inspectors' questions relating to matter 2.

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Overall spatial strategy

2.1 Is the spatial strategy for housing justified?

1. Yes – the justification for the approach is set out in the Strategy Topic Paper (TP01).
2. In short, it is largely predetermined by the geographical and environmental constraints and the finite amount of undeveloped land that exists in the Borough. All sites which the Council considers available and suitable for sustainable development are allocated in the submitted Plan (CD01). This is necessary in order for the Borough to meet its objectively assessed needs in full.

Housing requirement (as set out within Policy DR1)

- 2.2 Is the housing requirement figure of 10,433 dwellings over the Plan period justified and is there any evidence to suggest that the housing requirement should be increased above the standard methodology figure in accordance with Paragraph 010 (Reference ID: 2a-010-20201216) of the PPG?**
3. Yes, the Council considers that the housing requirement figure of 10,733 net new homes (as set out in policy DR1) is justified and provides a small buffer against the standard methodology figure for housing need of 10,433 dwellings (as set out in Table 2 (p.15) of the submission Local Plan (CD01)). Furthermore, the Council considers that the evidence suggests that the housing requirement figure should not be increased above the figure of 10,733 dwellings in Policy DR1.
 4. Planning Practice Guidance¹ sets out the circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates. The circumstances that may be appropriate are set out in the PPG:
 - Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.
 5. The Council can confirm that there are no specific growth strategies with funding in place to promote and facilitate additional growth that apply to Havant Borough.
 6. The Council is supportive of the bid for a Solent Freeport. However, the recently published Partnership for South Hampshire Economic, Employment and Commercial Needs (including logistics) Study (EB60) (para 9.49, p.64) advises, "...that there is considerable 'headroom' in the Standard Method to be more economically ambitious than our 'need' analysis would suggest. This headroom could extend to 50,000 – 60,000 more new jobs than in the Experian forecast. So even a nationally significant investment of say, 20,000 additional jobs would not require more new homes." The Study goes on to conclude (paras 11.41 – 11.42, p.76), "Our evidence suggests that there is future capacity in the housing stock to accommodate more people, should they be motivated to move to South

¹ Planning Practice Guidance: [Housing and economics needs assessment](#). Published 20 March 2015. Last updated 16 December 2020. Paragraph 010 (Reference ID: 2a-010-20201216)

Hampshire. Perhaps because of a successful inward investment or delivery of a ‘transformational project’. Given the size of the housing ‘boost’ – over the baseline trend in growth – there is significant capacity to accommodate more people before additional homes need to be planned for.”

7. The Council considers that this evidence demonstrates that should the proposed Freeport progress to implementation, this would not require an uplift to the housing need figure.
8. There are no strategic infrastructure improvements that would be likely to drive an increase in the homes needed locally. However, as referenced above, were significant strategic infrastructure improvements to come forward, there is significant headroom within the existing housing need figures.
9. The Council has not agreed to take on unmet need from neighbouring authorities. It is acknowledged that there is unmet housing need within South Hampshire and the Portsmouth City Council area in particular. The Council has agreed Statements of Common Ground with Portsmouth City Council (SCG04 and SCG04a) and the rest of the Partnership for South Hampshire Authorities (SCG05), which address the ability of the Havant Local Plan to accommodate unmet housing need. The Partnership for South Hampshire has agreed a Statement of Common Ground (SCG09) which sets out how the constituent authorities intend to deal with the issue of unmet need in South Hampshire through the production of a new Joint Strategy.

2.3 The Plan allocates some 149,940 square metres (sqm) of employment floorspace against an identified need of 86,919 sqm. Does this have any implications for housing need having regard for the need to balance jobs and homes?

10. Based on the Employment Land Review Update (EB54a), the Borough only actually has a balance of 10,046 sq. m against employment need over the plan period (see Table 5.1). This reflects the removal of Dunsbury Park from overall employment land supply (57,700 sq m) given the proposed Freeport ‘tax site’ was announced after the Plan was submitted (CD01). Related proposed changes for the Inspectors to consider are shown in CD27b (paras 2.35, 2.53, and new 3.120).
11. On the question of balance between jobs and homes, this is addressed in the response to Matter 2.2.

2.4 The Specialist Housing Topic Paper (Ref EB38) identifies that in July 2019, there were 54 individuals on the Council’s self and custom house build register. How will the Plan deliver this need?

12. The Specialist Housing Topic Paper (EB38) identifies the number of Community Infrastructure Levy (CIL) Self Build Reliefs that were granted by application year. The average between 2014 and 2018 (whole years for which data is available) is over 14 dwellings per annum. It is therefore reasonable to conclude that the need for self and custom build houses is being met without any specific local plan policy to allocate specific sites or require a proportion of provision on allocated sites.

13. However, the submitted Local Plan (CD01) includes Policy DR1 that states, “The Council is supportive in principle of schemes which will provide a diverse mix of housing and cater for new and emerging housing models and innovative products, including self and custom-build products”. This policy sets out support for the principle of the inclusion of self and custom build plots. Policy KP5 (Southleigh) criterion a.ii requires development to, “Offer a wide range of attractive and imaginatively designed home types, tenures, densities and styles to cater for all sections of the community and for all stages of life, including genuinely affordable housing and, if there is a need, specialist accommodation for people with support or care needs and self-build plots.” The supply of self and custom build dwellings will be monitored against the need identified through the register and if necessary, provision will be negotiated through the development management process as the planning application for the major site allocation at Southleigh is progressed.

Housing trajectory & supply

2.5 The Council has set out that on adoption it is likely to have a 4.2 year housing land supply. Has all been done to try and boost the supply, of housing in the short term?

14. Yes. The Council is a pro-development authority and is doing everything possible to significantly boost the supply of housing in the short term. The Council has submitted an updated Five Year Supply Housing Supply position (June 2021) (EB36a) which indicates the Borough has a slightly improved position of 4.4 years with a 20% buffer. The Council considers it has taken a cautious approach in reaching this position.
15. In establishing the five year requirement, the Council has used its minimum annual housing need requirement of 504 dpa, and added the shortfall (502 dwellings) from the first part of the plan period (2016/17-2020/21), equivalent to at least an additional years' worth of housing need (504 dwellings) (EB36a, Tables 2 and 3).
16. The PPG² advises: "Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure." Excluding any shortfall, the Council's housing land supply position would automatically increase by a year (to 5.4 years).
17. The PPG does however go on to state: "Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing." This is the case for the submitted Plan (2016-2037), with an accumulated shortfall of 502 dwellings since 2018/19.
18. The Housing Delivery Action Plan (EB37) highlights why there has been such a shortfall in housing delivery in recent years. It highlights the twin pressures of the Dutch Case which requires new development to be nutrient neutral, as well as the impact of the macroeconomic uncertainty in the lead up to the Covid 19 pandemic and the associated recession.
19. The action plan emphasises that the Council continues to take a proactive approach to grant planning permission on a number of Housing Statement (CD29) sites, and emerging allocations in order to significantly boost the supply of housing in the short term. Most recently, the Planning Committee resolved to grant planning permission APP/20/01093 at Land north of Sinah Lane (H29).
20. In April 2021, the Council contacted all landowners and developers with emerging allocations to establish the likely timescales for pre-applications and application

² Planning Practice Guidance: [Housing supply and delivery](#). Published 22 July 2019. Paragraph: 031 Reference ID: 68-031-20190722

submissions (in line with the action set out in EB37 para 4.8). This highlighted a number landowners and developers expect to submit their pre-application and applications in the next 12-18 months. These updates are reflected in the Five Year Supply Update (EB36a) and the trajectory is included as a proposed change (CD27b, Appendix 3 and TP01a).

21. It is worth noting the Council has also since received a revised application for Forty Acres (H14) which seeks to increase the permitted 320 dwellings to 354 dwellings. In addition, a planning application for Phase 2 of land east of Castle Avenue (H15) is expected for 194 dwellings in late June 2021³. If permitted, these would have the potential to increase housing supply by a total of 288 additional dwellings in the short term⁴. A written/verbal update on these sites can be provided to the Inspectors in due course.
22. In addition, whilst it is noted omission sites are to be discussed at the Stage 2 Examination Hearings in the Autumn, the following sites have the potential to improve five year supply in the short term:
 - HY5 & HY11 Land north of Tournurbury Lane & Hayling College - Following their representation (R111 20C01) to the 2020 Pre-Submission Plan consultation (CD09), the Council has further engaged with the site promoters and Sport England. The site(s) is currently discounted due to a restrictive covenant, and the harm arising from the loss of playing field to residential development. Sport England has indicated the loss of playing fields could be shown to be acceptable in principle with appropriate mitigation. In relation to the former, the Council has satisfied itself that the covenant issue can be addressed and that the site at least meets the definition of developable in accordance with Annex 2 of the NPPF. The Hayling College site is however, currently outside of the settlement boundary as proposed to be defined by Policy E3 on the Policies Map (CD04)⁵. The site promoter has confirmed that there is clear developer interest, and are confident that delivery could start in 2022/23 (within the five year period).
 - Land east of A3(M) - The Council is currently considering an outline planning application APP/00441 for the development of 120 dwellings at land west of Hulbert Road. The Council remains of the view that the site should not be allocated in the submitted Plan (CD01). Nonetheless, it is mindful in determining the current outline planning application that the presumption in favour, and five year housing land supply are material planning considerations which will need to be weighed carefully in the overall planning balance. At the

³ The updated trajectory (CD27b, Appendix 3 and TPO01a, Appendix 1) only anticipates that Phase 2 will deliver the balance of the Phase 1 allocation (255 – 69 = 186 dwellings).

⁴ These numbers were not included in whole or part in the EB36 Five Year Housing Land Supply Update in February 2021. EB36a reflects the site capacities of the allocations in the submitted Plan (CD01) because the revised proposals have yet to be permitted.

⁵ Please note the Council's Planning Policy Committee will consider the submission of an allocation as a proposed change over the summer, prior to any stage 2 hearings taking place. The Council will update the Inspectors in due course.

time of writing, there are various technical matters yet to be resolved before the application can be considered at the Council's Planning Committee.

23. A written/verbal update on both of these sites can be provided to the Inspectors at the Examination Hearings in due course.
24. Finally, the Council reaffirms that ensuring that an up-to-date Local Plan is in place as quickly as possible is key to securing a five year supply in the short term. An adopted Local Plan which is up-to-date provides market certainty in terms of how and where homes should be delivered. Indeed, the Council saw a surge in housing completions following the adoption of the Local Plan (Allocations) in 2014.

2.6 The allocations and areas of search (KP Policies) add up to some 5,427 dwellings in total. Is the figure of 4,753 dwellings from the site allocations in Table 2 of the Plan therefore correct?

25. Table B in Appendix 1 of this statement confirms the number of dwellings allocated in the submitted Plan total 5,427 dwellings, excluding Southleigh. The figure of 4,753 dwellings (included in CD01, Table 2) erroneously excluded allocations which did not benefit from planning permission at September 2020 (see Table A appended to this Statement) to avoid double counting. Allocations with planning permission (or resolution to grant subject to S106) in the submitted Plan (CD01, Table 2, page 15) are reflected together with the outstanding permissions (2,060 dwellings).
26. For absolute clarity, the Council propose a change to the 'Allocations' total in Table 2 (CD27b, page 15) to rectify this. However, Table C, Appendix 1 of this statement highlights the need to adjust the 5,427 dwelling figure to take into account a small number of changes needed to site allocation capacities⁶, and therefore a revised total of 5,387 applies (CD27b). 'Outstanding planning permissions' in Table 2 have been adjusted accordingly, and updated to reflect this year's monitoring data (as of 1 April 2021).
27. Workings for Table 2 included in CD27b (Proposed Changes for the Inspectors to Consider) can be found in TP01a, Appendix 2.

⁶ To reflect to reflect recent permissions (notably that of H26 9 East Street – from 11 to 6 dwellings and H35 The Colt Site) – from 100 to 94 dwellings.

Policies KP1 and KP2

2.7 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates completions being delivered for Key Projects 1 and 2 in 2025/26. Are these realistic having regard to any landowner and infrastructure constraints for each project?

28. Yes. As with all of the sites subject to allocation, the planning constraints and infrastructure requirements were assessed through the Sustainability Appraisal (CD10), and the Infrastructure Delivery Plan (EB50), with the notable exception of the Site Screening (EB42) for these Key Projects. This is due to the impracticalities of assessing technical constraints within areas of search.
29. In addition, Policy H2 sets out a reduced affordable housing requirement of 20% in Havant and Waterlooville Town Centres (there is a 30% requirement for the rest of the Borough). This reflects the higher costs of site assembly; site works and build costs in these locations (as set out in the Viability Study EB48).
30. The Council's response to the last letter (CR10) from the inspectors sets out how it is intended to deliver the development identified in line with the Housing Trajectory. The Council owns significantly more land in Havant Town Centre compared to Waterlooville and this means that development here can be progressed sooner. Nonetheless, there is private sector interest in Waterlooville Town Centre.
31. The Council is submitting a Levelling Up Fund bid on 18 June which will be focussed on the delivery of development in Havant Town Centre. If granted, this would enable the delivery schemes to be accelerated and brought forward in advance of the timescales in the housing trajectory.

2.8 Are each of the Key Projects 1 and 2 deliverable, including the number of dwellings envisaged (750 dwellings for Havant and 600 dwellings for Waterlooville)?

32. Yes. The Council has looked to boost housing densities for KP1 and KP2 and through the Local Plan as a whole in line with the National Planning Policy Framework (Paragraphs 122-123). It is considered that KP1 and KP2 meet the aspirations of Paragraph 123a of the NPPF which sets out that where there is a shortage of land to meet the need for development, which is clearly the case in Havant Borough, that minimum density standards for town centres should be used which "seek a significant uplift in the average density of residential development within these areas".
33. Within both the Havant Town Centre and Waterlooville Town Centre smaller distinct areas have been divided proposing different policy aims. Examples such as Market Parade, Wellington Way and North-East London Road, are identified as areas for residential development with town centre uses as a lower priority. These areas provide significant opportunities within the town centres to exceed by some margin the minimum density levels and create high density and high quality development which minimises the need to travel.

34. Policy H3 within the Local Plan identifies Havant and Waterlooville Town Centres, together with Emsworth and Leigh Park District Centres, as being able to accommodate a minimum of 70 dwellings to the hectare. No maximum density is provided. These locations have the best access to a mix of, service, other facilities and transport links. They have the ability to support high density living where reliance on the private car is minimised, or potentially eliminated. This approach is reflected in the Council's Residential Density Evidence Paper (EB41) together with the Parking Supplementary Planning Document (Section 3).
35. In terms of deliverability, the Council has set out in particular detail of the progression of the Civic Campus site in Havant Town Centre, in collaboration with Homes England, within our letter of 11 May 2021 (CR10). The Council is submitting a Levelling Up bid on 18 June which will be focussed on implementing mixed-use schemes in Havant Town Centre, substantially contributing to achieving 750 new homes in the town centre. There has been previous private sector interest in the town centre as well with the granting of outline planning permission for 130 apartments in Market Parade in 2016. Whilst this outline planning approval has since expired, it represents landowner interest in higher density schemes. In Waterlooville Town Centre, letter CR10 describes the interest in the Wellington Way site. It is worth noting that the completions in both town centres are not programmed for the first five years of the Local Plan's delivery.

What work has been done to estimate the expected number of dwellings from each area?

36. The Council has analysed Havant and Waterlooville Town Centres through the Town Centre Study (EB51). The study found that there is an excess of retail space and it is the wrong size and configuration for major retailers. As such, large areas, including the north of London Road in Waterlooville and Market Parade in Havant, which are currently predominantly retail areas would be promoted for solely residential use at the higher densities outlined above.
37. The overall approach in the NPPF and the identification of uses and residential development opportunities in the different areas has informed the overall quanta of development in these allocations.

2.9 Does each key project meet the definition of developable within the NPPF?

38. Yes. Para 67 of the NPPF states, "...Planning policies should identify a supply of:...b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan." The NPPF definition of 'developable' is contained within glossary and states, "To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could viably be developed at the point envisaged."
39. Given the reference to 'suitable location for housing development', the key projects proposed for Langstone Technology Park (KP6), Dunsbury Park and Havant Thicket Reservoir are not the subject of further comment in this statement as they are not proposing housing development. However, it should be noted that phase 1 of development

at Dunsbury Park is underway, with some buildings completed and occupied, and there is a current planning application for Havant Thicket Reservoir (reference: APP/20/00990). On 3 June 2021, the Council's Planning Committee Resolved to grant planning permission for this application.

40. The key projects proposed for Havant Town Centre (KP1), Waterlooville Town Centre (KP2), Hayling Island Regeneration (KP3) (with the exception of Northney Marina) and Leigh Park District Centre (KP4) are all included within the Council's Regeneration Strategy (EB34). The Regeneration Strategy aims to diversify the housing market by developing Council owned sites for homes that increase densities, are aimed at a new demographic and provide new products on the market. This will enable the generation of capital receipts which the Council can reinvest in the key regeneration areas. The Council can therefore align its regeneration and planning proposals with the ability to drive forward development as a major landowner. It can also confirm that these sites are available.
41. The Regeneration Strategy (EB34) (p.14) states that the projects within the regeneration programme will be delivered in phases and that emphasis will be placed on where there is the most potential to move things forward quickly and have the greatest impact. A key aspect of the prioritisation programme is to focus on areas with Council land/property ownership or areas of strategic acquisition. This will reduce reliance on other partners and landowners and generates a capital receipt for reinvestment in the programme. In the Regeneration Strategy (EB34) (p.24), the Council has put in place a strong governance structure including a Strategic Programme Board and a Regeneration Operational Board and project groups to drive forward initial (housing) priorities in Havant Town Centre and Hayling Seafront.
42. With respect to Havant Town Centre (KP1), phase one involves the release of the car park opposite the Public Service Plaza to provide at least 120 homes. Further details of this are provided in the Council's recent letter (CR10). Once completed, phase one will provide funding to progress phase two (Market Parade), phase three (Public Service Plaza and phase four (West Street and the Meridian). It should be noted that the Council purchased the Meridian Shopping Centre and Bulbeck Road Car Park in December 2019.
43. With respect to the sites on Hayling Island Seafront (KP3), it is envisaged that regeneration is likely to start by redeveloping underused Council land at Southwood Road and that the capital gained from this will be used to fund development at Eastoke Corner and then move increasingly west, funding the development at Beachlands and West Beach (see also question 3.14).
44. Viability analysis within the Hayling Island Seafront Regeneration Analysis and Feasibility Study (EB35) (p.62) concludes that the residential elements of the development are estimated to generate a residual land value between £7.3m and £8.975m which demonstrates that the development would be viable.
45. The Local Plan and CIL Viability Study (EB48) provides evidence that the housing proposed in the Local Plan is likely to be viable. The conclusions for a range of different size and type of housing scheme are in paras 3.4.22 – 3.4.68 and this affirms that development is likely to be viable with 30% affordable housing (20% in Havant and Waterlooville town centres and Leigh Park district centre). The Local Plan and CIL Viability

Study (EB48) (para 3.9.4) also provides evidence that the proposed allocation at Southleigh (KP5) is likely to be viable with 30% affordable housing, albeit with a nil-CIL rating⁷.

46. Northney Marina (KP3), Southleigh (KP5) and Havant and Southdowns Colleges (KP8) are all proposals in the Local Plan that are supported by the relevant landowners. This is evident in the representations made by the landowner for each site (R135, R252 and R340). The Council has engaged with these landowners through the drafting of the Local Plan.
47. As set out in the Strategic Housing Land Availability Assessment (SHLAA) (EB42a), the Council considers that the residential allocations in the key projects are in a suitable location for housing development, landowners (including the Council) support their allocation so there is a reasonable prospect that they will be available, and the viability analysis demonstrates that they could be viably developed. It is therefore concluded that each of the key projects meets the NPPF definition of developable.

2.10 Is the identified Havant town centre boundary justified, having particular regard to the exclusion of East Street?

48. Yes, the overall boundary and the exclusion of East Street are justified. The Council recognised a need to identify the Havant Town Centre boundary as outlined in the Town Centre Study (EB51) to include the new retail development to the west, which are outside the current boundary, and all commercial areas. There was also a need to consolidate the retail core of the town centre in line with the shift in the national retail market towards smaller town centres as discussed in Sections 4 and 5 of the Town Centres Study (EB51).
49. Havant's main shopping frontages are now West Street, the southern end of North Street, the Meridian Centre, and Solent Retail Park.
50. As outlined in the Town Centre Study (EB51) paragraph 6.35 highlights that several units previously occupied by a mixed range of uses on East Street have been converted to residential use. Due to the change in character and use of East Street it is not appropriate or effective for it to remain in the town centre boundary as it no longer provides a town centre function.
51. As stated in paragraph 3.7 of the Submission Havant Borough Local Plan (CD01) it is not the Council's intention to prevent any existing businesses along East Street from operating but instead due to the trend of town centre uses gravitating to other areas within the town centre boundary the Council would give support for the conversion of any vacant units to residential use on East Street. This is considered better than them staying in commercial use but vacant.
52. It is also worth noting that the conversion of town centre uses to residential uses is also now allowed within the proposed permitted development rights. As such the exclusion of

⁷ The Council has progressed a review of its CIL charging schedule alongside the Local Plan. This identifies the KP5 site as nil-CIL. The Council submitted the charging schedule for examination on 5 June 2021.

East Street adopts this approach and its inclusion within a town centre boundary would not be justified.

2.11 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates the delivery of 729 dwellings from Policy KP1. Why is this different to the 750 dwellings set out in Policy KP1?

53. To avoid double counting, the extant permission 18/00530 at North Street Arcade for 21 units was subtracted from the total level of housing proposed (750 dwellings). The site now has permission for a revised scheme of 29 units (20/00251), the level of housing anticipated by KP1 has been adjusted accordingly (see Table C appended to this statement, CD27b Appendix 3, and TP01a).

2.12 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates the delivery of 540 dwellings from Policy KP2. Why is this different to the 600 dwellings set out in Policy KP2?

54. Similarly, a total of 30 units was subtracted to reflect the extant permission 16/00963 at 81C The Clockhouse, London Road. This scheme has now lapsed. The remaining 30 units appears to be a discrepancy. The updated trajectory (see Table C appended to this statement, CD27b Appendix 3 and TP01a) includes a correction from 540 to 600 dwellings.

2.13 To be effective, should the Policy KP2 say ‘In addition to criteria a) to g)...’?

55. Yes, the Council propose a modification to the Local Plan to remove the reference ‘a) to h)’ and replace it with ‘a) to g)’. This has been included in the Schedule of Proposed Changes (CD27b).

Policy KP5

2.14 Is there sufficient evidence to suggest that the proposal would not have a severe impact on the strategic road network?

- 56. Yes. The Local Plan is supported by a Transport Assessment (EB05) considering the development proposed through the Local Plan including the allocation at Southleigh, as well as additional more detailed Addendum for Southleigh specifically (EB06).
- 57. The Council acknowledges that a further detailed transport assessment will be required before planning permission can be granted, and this will determine the final package of mitigation for the development. However, both the Mainland TA report and its Addendum have provided sufficient evidence at the strategic level to conclude that it is possible to mitigate the expected effects of the planned development (both the Local Plan as a whole, and Southleigh specifically), accommodating the expected level of development without a severe impacts (see 1.2.9 and 8.1.23 and 24 of EB05 and 7.7 of EB06 Part 2).

2.15 Are the methodologies and modelling assumptions used for the Mainland Transport Assessment Addendum: Southleigh Study (Part 1 and 2) & A27 Junction Feasibility Study robust?

- 58. Yes. The Southleigh Study (EB06) applied the principles established through the strategic modelling (using the Sub Regional Transport Model (SRTM)). This is a well established model that is used for strategic level assessments of transport impacts of Local Plans across the sub-region. The Southleigh Study then created a more detailed, local road network model to undertake the necessary individual junction analysis in order to understand the direct transport implications of the Southleigh site. Where necessary, manual adjustments to the modelling inputs have been made to better reflect the more detailed approach in the Southleigh Study. The methodology of combining the established SRTM inputs and making localised adjustments is set out in greater detail in chapters 5 and 6 of Part 1 Southleigh Study report (EB06).
- 59. The A27 Junction Feasibility Study (EB01) confirms that the assessment of the options considered has been carried out in accordance with Highways England's 'Early Assessment and Sifting Tool' (EAST) – see Executive Summary and Appendices 1 & 2 of EB01.

2.16 Do the studies, particularly Part 1 of the Southleigh Study provide robust justification for a new junction with the A27?

- 60. Yes. The modelling results of Part 1 of the Southleigh Study (EB06) showed that the surrounding road network cannot accommodate the forecast 2036 Baseline (No Local Plan) and Do Minimum (Local Plan, but no mitigation) figures. Data outputs for the majority of the junctions display issues with the forecast 2036 Baseline figures and when junctions are assessed with 2036 Do Minimum figures, junction operation gets worse with no reserve capacity. Most of the junctions require improvement measures to be able to accommodate the 2036 forecast traffic (see chapters 6-8 of EB06 Part 1). Part 2 then demonstrated that changes to the Warblington junction and a direct link road are able to mitigate the impacts

on the road network surrounding the Southleigh Site. It is for this reason that land for the junction has been safeguarded⁸.

61. While the TA is robust at a plan level, it is acknowledged that the assessments so far would not be sufficient to fully justify the delivery of a new junction. The Council is clear that the TA and its addendum are designed as strategic level assessments, which need to be followed up with more detailed work to support any future planning application. A site specific TA for the development produced in support of an application will consider the full mitigation package for the development in the round and determine the most appropriate package and associated timescales for delivery. Modifications to the supporting text of KP5 (paragraph 3.108) have been suggested (CD27) (see question 2.19 below) to clarify this.

2.17 Would a new spine/link road, particularly the identified preferred option and the safeguarded land in Policy IN2, have any significant impacts on the existing service stations on the A27 and the delivery of site allocation C9?

62. No. It is possible to deliver a link road and new junction arrangements while not having a significant impact on the existing service stations or compromising development under allocation C9.
63. The Southleigh Study (EB06) has determined that an amended version of the smaller of the two preferred options under consideration ('Option 1B+') would be capable of delivering a suitable mitigation scheme. That scheme would have no effect on the service stations or the land allocated at C9. The outline of that scheme '1B' and its '1B+' variation can be seen in Appendix 1 and at paragraph 5.23 of Part 2 of the Southleigh Study. If this option is pursued, there would be no overlap between the junction and the allocation at C9 or the services stations.
64. IN2 safeguards the option from the A27 Feasibility Study (EB01) with the greater land take ('option 4D') so as not to preclude either of the two preferred designs, since the final arrangement is not yet known.
65. Even if Option 4D or a similar arrangement including an overbridge connecting land north and south of the A27 were to be delivered, this would affect only the ingress and egress arrangements at the southern service station and would not necessitate its removal.
66. Whichever form of junction is delivered, it will be possible to deliver the allocation under Policy C9, which is for roadside services to complement the petrol filling station, and/or small-scale distribution / warehouse floorspace. The safeguarding of the land for the junction under IN2 does not affect the deliverability of such facilities.

⁸ It should be noted that the measure suggested in the Southleigh Study is an alteration to an existing junction, rather than a new junction on the A27.

2.18 The housing trajectory provided in the Strategy Topic Paper (Ref: TP01) estimates completions being delivered from Policy KP5 Southleigh from 2025/26. Is this realistic, given that the Council has set out in their response (Ref: CR08) to our initial questions that it is unsure when highway improvements will need to be implemented to allow the delivery of homes on the site?

67. Subsequent to the Council's response in CR08, it is considered reasonable to shift delivery back a year to 2026/27 given the 18 month delay in submitting the Plan for Examination. This is considered realistic given the adoption of the Plan is needed to provide the site promoter with the necessary certainty to commence preparing an outline planning application and associated Transport Assessment. This is shown in the updated trajectory and the consequential changes needed to the Plan (CD27b, see Table 2, new para 3.102 and Appendix 3).

2.19 The Council are seeking to alter (Ref: CD27a) criterion b. v. and Paragraph 3.108 of the supporting text with regard to highway improvements, are these changes justified?

68. The suggested change to 3.108 is required to reflect the position since completion and publication of Mainland Transport Addendum: Southleigh Study (EB06) in January 2021. The text in the submission plan reflected the position before the study had been completed and is now out of date.
69. In addition, the proposed amended text makes it clearer that site specific transport work will be required to inform the final transport mitigation package for the site and support an application. This is not a change in the Council's position, but makes this point more explicitly than the submitted text. This is also the reason for the proposed change to criterion b.v.
70. Similarly, the reference to reducing the need to travel, facilitating active travel and sustainable modes is not a change in position, but reinforces the national policy stance and that of policy IN3 in the plan. It also reflects the position of the local Highway Authority (see SCG10) and Highways England (SCG16).

2.20 Is the development of best and most versatile agricultural land justified?

71. Yes, this is justified and necessary for the Local Plan to be sound. The Council has limited options for land to allocate to meet housing needs. Paragraph 11 of the NPPF makes it clear that 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...'. In Havant Borough, given other constraints (see the Housing Constraints and Supply Analysis (EB39)), this necessitates the development of best and most versatile agricultural land.
72. The footnote to para 11 of the NPPF references the policies in the NPPF that protect areas or assets of particular importance and provide a strong reason for restricting the overall

scale, type or distribution of development in the plan area. The footnote does not include any reference to the protection of best and most versatile agricultural land.

73. Para 170 of the NPPF references the need to recognise the economic and other benefits of best and versatile agricultural land. However, when set against para 11 of the NPPF it is clear that the Local Plan would not be sound if it failed to meet housing needs on the basis that it would require the development of best and most versatile agricultural land.

2.21 Does Policy KP5 conflict with Policy E6 in relation to best and most versatile agricultural land?

74. No, upon adoption of the plan, the land allocated under policy KP5 will be within the settlement boundary. Policy E6 only applies to development proposals on greenfield sites outside of the settlement boundary.

2.22 To be effective should Policy KP5 refer to sewerage network reinforcements being required?

75. The list of site opportunities and constraints already states that ‘Sewerage network reinforcements will be required in advance of occupation of development to avoid an increased risk of foul water flooding’. This is consistent with the approach taken for other sites where Southern Water has identified a likely need for reinforcements.
76. The Council does not consider that it is necessary to repeat the requirement in the actual policy wording of KP5 (or other sites where this need has been identified), as the plan must be read as a whole and Policy E20 includes the requirement under criterion d that ‘arrangements have been made between the applicant and the service provider for the timely delivery of sewerage network reinforcement’.
77. This approach and detailed wording were agreed between the Council and Southern Water in a Statement of Common Ground (SCG07) in response to Southern Waters Regulation 19 representations (R034 C01). Their 2020 representation (R034 20C01) confirms they are content that previous comments have been addressed.

2.23 To be effective should Policy KP5 or its supporting text refer to the site being within the Chichester and Langstone Harbour SSSI impact risk zone?

78. No. The site is included in the Impact Risk Zone due to the potential impact of nutrients. This is addressed through other policies in the Local Plan (CD01), notably EX1. This policy applies to all new development of overnight accommodation in the Borough regardless of whether allocated or not. The Council has highlighted this matter only in allocations where the constraints are notable or specific to that site, rather than those which apply across the Borough.
79. The Local Plan (CD01) is clear itself in paragraph 1.12 that “The Local Plan must be read as a whole”.

2.24 A proposed change to Policy KP5 has been suggested by the Council (CD27a) with regard to Drainage and Flood Risk Management. Is this justified and necessary for soundness?

80. The proposed change is one that was agreed with the Environment Agency but that was erroneously omitted from the 2020 Pre-Submission consultation.
81. The EA had commented in their 2019 Regulation 19 response (R146 C03) that they were 'also pleased to see specific mention of the main river in bullet xix⁹. For clarification however, whilst we support safeguarding measures we suggest that the emphasis should be placed on avoidance of negative effect on the River in the first instance and only turning to mitigation if avoidance is not possible.'
82. The Council agreed with this suggestion, which reflects the well-recognised management hierarchy of avoid – mitigate – compensate. The discussion between the two bodies on this point is documented in the Statement of Common Ground (CD01), together with the revised wording put forward in CD27a.

⁹ Bullet numbering has since changed and the bullet in question in CD27a is numbered xiii

Other Sites

2.25 Are Site Allocations H8 and H34 likely to start delivering completions in 2023/24?

83. Land north of Long Copse Lane (H8) – Yes, the site promoter anticipates the submission of a planning application broadly coinciding with Stage 1 of the Examination Hearings in July 2021. The site promoter considers there to be sufficient time between submission and following reserved matters and pre-commencement requirements in terms of the proposed first build year. First completions (20 dwellings) in 2023/24 are deliverable, and the site promoter expects to deliver slightly ahead of this (as it is usually feasible to deliver in the region of c. 50 units per annum).
84. Cabbagefield Row (H34) – Portsmouth City Council has approved capital expenditure of £260,000 to deliver outline planning consent to deliver housing on the site¹⁰. The site promoter has subsequently confirmed they anticipate first completions during 2024/25 (as opposed to 2023/24), but still within the first five years. This is reflected in the updated trajectory (CD27b).

2.26 Is Site Allocation H29 likely to start delivering completions in 2021/22?

85. Yes. The site has resolution to grant permission APP/20/01093 and the legal agreement is at an advanced stage (see response to 5.10). On this basis, the housebuilder has confirmed that first completions will occur this monitoring year (2021/22).

2.27 Are the delivery assumptions for all other sites set out in the housing trajectory provided within the Strategy Topic Paper (Ref: TP01) justified?

86. Yes. The delivery assumptions in the housing trajectory (accompanying the submitted Local Plan (CD01)) are based on communication with landowners and developers throughout the year. Where there is clear pre-application work and intention to bring the site forward within five years, these sites are also included.
87. Phasing in the updated trajectory (CD27b, Appendix 3 and TP01a) has been informed by more recent correspondence with landowners and developers in April 2021 (see the Council's response to Matter 2.5).

¹⁰ [Portsmouth City Council – Cabinet Member for Housing and Preventing Homelessness. Cabbagefield Row, Havant - Council Housing Development -25th January 2021](#)

Other housing land supply matters

2.28 The number of expected completions for some years between 20/21 and 24/25 (the five year period) set out in the housing trajectory (Ref: TP01) and the Five Year Housing Land Supply Update (Ref: EB36) differ. Why is this?

88. An assessment of five year supply can only represent a snapshot at particular point in time. Early in 2021, the Council undertook background work in support of an appeal (reference APP/X1735/W/20/3259067) at Land South of Lower Road (H20). This included focused correspondence with landowners and developers promoting large sites without planning permission to inform updated delivery assumptions in the February 2021 Update (EB36). As part of this, the Council undertook a critical analysis of phasing and adjusted the delivery on some sites to avoid presenting an overly optimistic position. The update also took account of the 2020 Housing Delivery Test (HDT) result (20% buffer now applies).
89. The Council has also submitted a further Five Year Housing Land Supply Update (EB36a) which takes into account this year's monitoring data, and correspondence with all landowners and developers promoting allocations in the submitted Plan (CD01) in April 2021 (see Matter 5.6)

2.29 Are the assumptions on windfall development in the trajectory justified and is any reliance on the redevelopment of redundant/commercial/leisure uses appropriate in this regard?

90. Yes. The assumptions made for calculating the amount of windfall development (that would not otherwise be included in the supply) are set out in the Windfall/Unidentified Housing Development Analysis and Justification Background Paper (EB45). As set out in the Paper small site windfall development has previously formed a significant part of the overall housing supply in Havant Borough and given analysis of the characteristics of the Borough it is reasonable to conclude that it will continue to do so.
91. The inclusion of future redevelopment of redundant/commercial/leisure uses within the analysis is appropriate as this source of supply has proved significant in the past and there is no reason or evidence to indicate that this is unlikely to continue. It should be noted that any large 'one-off' type past windfall developments have been excluded (e.g. Proctor and Gamble Factory Site in Leigh park (para 6.6 EB45)) to avoid skewing the analysis with a previous opportunity of a scale unlikely to be repeated.
92. However, given the recent changes to the permitted development regime with respect the change of Class E uses (formerly Class A1, A2 & A3 uses) to residential (Class C3), the projected supply is unlikely to be an underestimate. This legislative change is reinforced by the trend for the decline in traditional retail and the need to repurpose some town centre land, which has been accelerated by the effects of the Covid-19 pandemic.

2.30 Is the Windfall/Unidentified Housing Development Analysis and Justification Background Paper (Ref: EB45) robust?

93. Yes, the Paper (EB45) is robust and the methodology is essentially the same as was used to inform the adopted Allocations Plan. The analysis has assessed the supply of unidentified, or windfall, sites for the five different character areas of the Borough for the period 2006/7 to 2019/20. This covers a full economic cycle and before 2006/7 the data is not reliable. The nature of the supply is then assessed against the type of development within each character area. The types of development are:
- residential garden land
 - residential redevelopment
 - redevelopment of redundant/commercial/leisure uses
 - conversions
 - previous open space.
94. Housing completions in each of the five areas, categorised against these types of development were analysed to identify trends likely to continue. Supply from allocated housing sites was also calculated so that it could be removed from the overall completion figures to ensure that only the unidentified supply was considered. Large 'one-off' type past windfall developments were also omitted. A further 10% reduction was then applied to ensure windfall contribution projected forward is realistic rather than optimistic.
95. The submitted Local Plan (CD01) does not include any specific policies that would prevent development on garden land, although Policy E1 (High quality design) includes criteria that would prevent inappropriate development.
96. The Council considers that this methodology is robust and provides compelling evidence that windfall sites will form a reliable source of supply. Furthermore, the recent changes to the permitted development regime increase the likelihood that the projected supply from unidentified sites proves to be an under-estimate.

2.31 For the Plan to be consistent with national policy, does the Plan itself need to include a housing trajectory?

97. The Council notes the requirement for the plan to include a housing trajectory. This was not included in the submitted plan (CD01) as it would inevitably change at the start of the 2021/22 financial year with new data on completions and outstanding planning permissions.
98. This data has recently been received and a refreshed housing trajectory has been prepared. This has been included as part of the Schedule of Proposed Changes (CD27b) in Appendix 3, and appropriately referenced in the body of the plan (paras 1.11, 2.46).

Appendix 1

Table A - Allocations in the submitted Plan (CD01) without planning permission

HBLP Ref	Site Name	Capacity
Key Projects		
KP1	Havant Town Centre	729
KP2	Waterlooville Town Centre	540
KP3	Southwood Road	35
KP3	Eastoke Corner (north)	20
KP3	Beachlands, Hayling Island seafront	100
KP3	Northney Marina	40
KP4	Leigh Park Centre	75
KP8	Havant College Campus	65
KP8	South Downs College Car Park	95
	Subtotal	1,699
Emsworth		
H8	Land North of Long Copse Lane	260
H10	West of Coldharbour Farm	44
H11	Gas Site, North Street	25
H13	Land at Fowley Cottage, Warblington Close	20
	Land rear of 15-27 Horndean Road	16
	Subtotal	365
Havant and Bedhampton		
H15	Land East of Castle Avenue	255
H17	Portsmouth Water HQ (existing HQ on West Street)	135
H19	Havant Garden Centre, Bartons Road	85
H20	Land South of Lower Road	50
H22	Littlepark House, Bedhampton	50
H24	Land at Palk Road	15
H25	Helmsley House	15
	Subtotal	605
Hayling Island		
H27	Rook Farm	390
H28	Land at Fathoms Reach	55
H29	Sinah Lane	195
H31	Manor Nurseries	9
H32	Pullingers, Elm Grove	43
H33	R/O 13-21 Mengham Road	7
	Subtotal	699
Leigh Park		
H34	Cabbagefield Row	155
H36	SSE Site, Bartons Road	80
H37	Land at Dunsbury Way	15

H38	Land at Riders Lane	70
H39	Strouden Court	55
	Subtotal	375
Waterlooville		
H40	Campdown	650
H42	Blue Star	90
H43	Goodwillies Timber Yard	120
H44	Padnell Grange	80
H46	Land at Waterlooville Golf Club	45
H47	Land north of Highbank Avenue	25
	Subtotal	1010
	TOTAL	4,753

Table B – Total number of dwellings to be delivered by the allocations and areas of search in the Submission Local Plan (CD01) (excluding Southleigh)

HBLP Ref	PP ref (where applicable)	Site Name	Capacity	Planning Status
Key Projects				
KP1		Havant Town Centre	750	Area of search
KP2		Waterlooville Town Centre	600	Area of search
KP3		Hayling Island Regeneration		
		Southwood Road	35	Allocation
		Eastoke Corner (north)	20	Allocation
		Beachlands	100	Allocation
		Northney Marina	40	Allocation
KP4		Leigh Park Centre	75	Area of search
KP8		Havant and South Downs Colleges		
		Havant College Campus	65	Allocation
		South Downs College Car Park	95	Allocation
		Subtotal	1,780	
Emsworth				
H8		Land north of Long Copse Lane	260	Allocation
H10		Land west of Coldharbour Farm	44	Allocation
H11		Gas Site, Palmer's Road	25	Allocation
H13		Fowley Cottage	20	Allocation
HX	(19/00768)	Land rear of 15-27 Horndean Road	16	Permission
		Subtotal	365	
Havant and Bedhampton				
H14	(18/00450)	Forty Acres	320	Permission
H15		Land east of Castle Avenue		
	(18/01033)	Phase 1	69	Permission
		Phase 2	186	Allocation
H17		Portsmouth Water Headquarters	135	Allocation
H18	(19/00007)	Camp Field, Bartons Road	72	Outline permission
H19		Havant Garden Centre	85	Allocation
H20		Land South of Lower Road	50	Allocation
H22		Littlepark House	50	Allocation
H23	(17/00863)	Southleigh Park House	90	Allocation
H24		Land at Palk Road	15	Allocation
H25		Helmsley House	15	Allocation
H26	(17/00695)	9 East Street	11	Permission
		Subtotal	1,098	
Hayling Island				
H27		Rook Farm	390	Allocation
H28		Land at Fathoms Reach	55	Allocation
H29		Land north of Sinah Lane	195	Allocation

HBLP Ref	PP ref (where applicable)	Site Name	Capacity	Planning Status
H31	(18/01297)	Manor Nurseries	9	Permission
H32	(20/00015)	Pullingers, Elm Grove	43	Permission
H33		Land rear of 13-21 Mengham Road	7	Allocation
Subtotal			699	
Leigh Park				
H34		Cabbagefield Row	155	Allocation
H35	(18/00244)	Colt Site	100	Outline permission
H36		Scottish and Southern Energy Offices	80	Allocation
H37		Land at Dunsbury Way	15	Allocation
H38		Land at Riders Lane	70	Allocation
H39		Strouden Court	55	Allocation
Subtotal			475	
Waterlooville				
H40		Campdown	650	Allocation
H42		Blue Star	90	Allocation
H43		Goodwillies Timber Yard	120	Allocation
H44		Padnell Grange	80	Allocation
H46		Land at Waterlooville Golf Club	45	Allocation
H47		Land north of Highbank Avenue	25	Allocation
Subtotal			1,010	
TOTAL			5,427	

Table C – Total number of dwellings to be delivered by the allocations and areas of search in the Proposed Changes to the submitted Local Plan (CD27b) (excluding Southleigh)

Changes to site allocations from the site capacities in the submitted Plan (CD01) shown in **bold**

HBLP Ref	PP ref (where applicable)	Site Name	Capacity	Planning Status
Key Projects				
KP1		Havant Town Centre*	721	Area of search
KP2		Waterlooville Town Centre	600	Area of search
KP3		Hayling Island Regeneration		
		Southwood Road	35	Allocation
		Eastoke Corner (north)	20	Allocation
		Beachlands	100	Allocation
		Northney Marina	40	Allocation
KP4		Leigh Park Centre	75	Area of search
KP8		Havant and South Downs Colleges		
		Havant College Campus	65	Allocation
		South Downs College Car Park	95	Allocation
		Subtotal	1,751	
Emsworth				
H8		Land north of Long Copse Lane	260	Allocation
H10		Land west of Coldharbour Farm	44	Allocation
H11		Gas Site, Palmer's Road	25	Allocation
H13		Fowley Cottage	20	Allocation
HX	(19/00768)	Land rear of 15-27 Horndean Road	16	Permission
		Subtotal	365	
Havant and Bedhampton				
H14	(18/00450)	Forty Acres	320	Permission
H15		Land east of Castle Avenue		
	(18/01033)	Phase 1	69	Permission
		Phase 2	186	Allocation
H17		Portsmouth Water Headquarters	135	Allocation
H18	(19/00007)	Camp Field, Bartons Road	72	Outline permission
H19		Havant Garden Centre	85	Allocation
H20		Land South of Lower Road	50	Allocation
H22		Littlepark House	50	Allocation
H23	(17/00863)	Southleigh Park House	90	Allocation
H24		Land at Palk Road	15	Allocation
H25		Helmsley House	15	Allocation
H26	20/00933	9 East Street**	6	Permission
		Subtotal	1,093	
Hayling Island				
H27		Rook Farm	390	Allocation

H28		Land at Fathoms Reach	55	Allocation
H29		Land north of Sinah Lane	195	Allocation
H31	(18/01297)	Manor Nurseries	9	Permission
H32	(20/00015)	Pullingers, Elm Grove	43	Permission
H33		Land rear of 13-21 Mengham Road	7	Allocation
		Subtotal	699	
Leigh Park				
H34		Cabbagefield Row	155	Allocation
H35	(19/01166)	Colt Site	94	Reserved matters
H36		Scottish and Southern Energy Offices	80	Allocation
H37		Land at Dunsbury Way	15	Allocation
H38		Land at Riders Lane	70	Allocation
H39		Strouden Court	55	Allocation
		Subtotal	469	
Waterlooville				
H40		Campdown	650	Allocation
H42		Blue Star	90	Allocation
H43		Goodwillies Timber Yard	120	Allocation
H44		Padnell Grange	80	Allocation
H46		Land at Waterlooville Golf Club	45	Allocation
H47		Land north of Highbank Avenue	25	Allocation
		Subtotal	1,010	
TOTAL			5,387	

* Havant Town Centre is allocated for 750 dwellings (KP1), but the site capacity has been reduced to 721, reflecting planning permission 20/00251 at North Street Arcasde for 29 dwellings

**The 9 East Street site is allocated for 10 dwellings (H26), but the site capacity has been proportionately reduced to 6 dwellings reflecting its permission 20/00933 for 10 supported living units, use class C2 equivalent to 6 dwellings for housing land supply purposes (see CD27b, para 8.51).