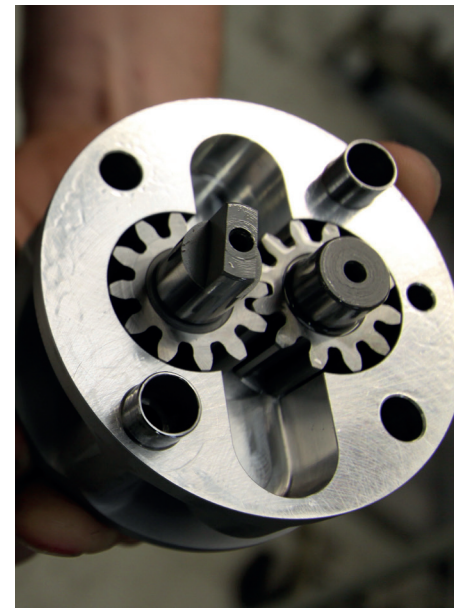


How to submit your comments



A step-by-step guide to commenting
on the Pre-Submission Local Plan





There is a process to being heard...

Since the consultation on the Pre-Submission Plan at the beginning of 2019, we have made a number of changes to the Plan which are now subject to public consultation. The consultation will mean that a consolidated plan can then be submitted for the independent inspector to consider.

The consultation is focused on the changes, particularly those more significant ones which are marked up with an arrow and reference number within the consultation version of the plan. This is due to them being subject of a further sustainability appraisal. There are also a number of changes in the Plan which improve clarity for decision making or are factual updates, but are not significant and so do not require a sustainability appraisal.

As before, the form provided asks you to make your comments in a certain way, this is because **the Government Inspector can only consider comments on the soundness or legal compliance of the Plan**. This time, the focus is on the changes and whether they make the plan sound and/or legally compliant. The form will therefore ask you to clearly highlight the change you are commenting on.

If you commented on the Pre-Submission Plan in 2019, your representations will still be submitted to the inspector. **Please do not re-submit your comments from the last consultation**. Instead, please submit your comments on the changes which have subsequently been made. The Government inspector will have access to all the comments from the consultations in 2019 and 2020 as well as reports highlighting the main issues raised in both consultations. You can see the report on the main issues raised in the 2019 consultation at www.havant.gov.uk/localplan.

How do I complete this form?

Apart from the section asking you for your contact details, the submission form is broken into two key parts for you to complete.

The first section addresses any comments you may have on the soundness of the Local Plan with the changes. The second section addresses any comments you may have about the legal compliance of the Local Plan with the changes.

Don't worry - this guide will provide definitions to help you when you reach the relevant section. The key points to remember are that - broadly speaking - soundness is about **what is in the Local Plan** and legal compliance is about **how we have prepared the Local Plan**.

Please note that in this consultation, comments can only be made on the version of the Local Plan with changes and whether it is sound and legally compliant. There have been previous opportunities for more general comments and feedback on the plan which have been considered by the council. Many of these were taken forward, however due to the need to comply with national policy, some could not be. For example, we couldn't require all new homes to have solar panels or be zero carbon, however we have required an enhanced level of energy efficiency and for all new houses to have electric vehicle charging points.

This consultation is for you to formally tell the Government inspector whether with the changes, you consider the council has prepared a sound and legally compliant Local Plan.

All comments from the 2019 consultation on the Pre-Submission Local Plan will be considered by the Government Inspector.



Changes to the Pre-Submission Local Plan Representation form

Your privacy matters: How the information collected by this form will be used

Our legal basis for using your personal data is to meet our legal obligations under planning legislation - the Town and County Planning (Local Planning) (England) Regulations – which require public consultation to be undertaken.

A copy of this form will be passed onto the Planning Inspectorate so that an effective examination of the Local Plan can take place informed by the representations submitted.

PART A: CONTACT DETAILS

1 - Please provide your contact details and those of your agent (if appointed).

Field	Insert your content below
Contact name	Dr Alex Smith
Organisation	
Email	das@mydomain.com
Phone	01234 567890
Address	4 Eastfield Road, Bedhampton
Postcode	PO9 1AB
Agent name (if applicable)	N/A
Agent organisation	
Agent email	
Agent phone	
Agent address	
Agent postcode	

Further information can be found within the document 'How to submit your comment: A step-by-step guide to commenting on the Changes to the Pre-Submission Local Plan' via our website www.havant.gov.uk/localplan. This should be read before completing the consultation form.

PART A: CONTACT DETAILS

1: PLEASE PROVIDE YOUR CONTACT DETAILS AND THOSE OF YOUR AGENT (IF APPOINTED)

Please provide your contact details in table one, including details of your organisation if you are responding on its behalf.

Unless you have appointed an agent to submit comments on your behalf, you do not need to complete the second section.

Personal information collected will be submitted to the Planning Inspectorate in order for the council to fulfil its legal obligations, and for an effective examination to take place.

There is more detail in the form and in our Privacy Notice which is available at www.havant.gov.uk/service-privacy-notices.



PART B: YOUR REPRESENTATION

Soundness

2 - Which change to the Local Plan are you commenting on?

Field	Insert your content below
Please use a change reference where possible	E12-02

3 - With the change(s), do you consider this version of the local plan to be sound in terms of being:

Field	Yes	No
Justified	X	
Effective		X
Positively prepared	X	
Consistent with National Policy	X	

PART B: YOUR REPRESENTATION

SOUNDNESS:

2: WHICH PART OF THE LOCAL PLAN ARE YOU COMMENTING ON?

The Inspector will need to know exactly what change to the plan you are referring to. The Local Plan document can be found at www.havant.gov.uk/localplan – please quote the change reference within the consultation document (e.g. DR1-002). Your comment will need to be about the soundness or legal compliance of the local plan with the proposed changes.

As the changes may affect the overall likely social, economic, and environmental effect of the Plan, you may wish to refer to the sustainability appraisal (SA) addendum to support your views. The SA addendum can be found on the website at www.havant.gov.uk/localplan/regulatory-requirements.

If you wish to comment on more than one change to the plan or evidence base study, please note that you will need to submit a separate comment form for each.



PART B: YOUR REPRESENTATION

Soundness

2 - Which change to the Local Plan are you commenting on?

Field	Insert your content below
Please use a change reference where possible	E12-02

3 - With the change(s), do you consider this version of the local plan to be sound in terms of being:

Field	Yes	No
Justified	X	
Effective		X
Positively prepared	X	
Consistent with National Policy	X	

3: WITH THE CHANGE(S) MADE, DO YOU CONSIDER THIS VERSION OF THE LOCAL PLAN TO BE SOUND IN TERMS OF BEING:

The definition of soundness is that it meets four specific criteria that are set out in the National Planning Policy Framework. These are:

- **Positively prepared:** With the change(s), will the Local Plan meet the area's objectively assessed needs as a minimum, and show that homes, jobs, services, and infrastructure can be sustainably delivered?
- **Justified:** With the change(s), is the Local Plan an appropriate development strategy, based on a proportionate, logical and credible evidence base?
- **Effective:** With the change(s), can the Local Plan deliver what it sets out to do, and with the agreement of our neighbouring authorities?
- **Consistent with National Policy:** With the change(s), is the Local Plan in line with the National Planning Policy Framework?

Please choose **yes** or **no** to highlight your views for each soundness criteria.



4 - With the change(s) please give the reason(s) why you do or do not consider this version of the local plan to be sound.
Please be as specific and concise as possible in your response.

Insert your content below

I believe that the requirement of 110litres per person is still too high. The requirement should be 100 litre per person. Southern Water have a target 100 campaign to reduce water consumption to 100 litres per person per day. This will help with population increase, climate change, urbanisation and protecting the environment.

The information to support this can be found in Part C of this form.

4: WITH THE CHANGES(S) PLEASE GIVE THE REASON(S) WHY YOU DO OR DO NOT CONSIDER THIS VERSION OF THE LOCAL PLAN TO BE SOUND.

Please summarise your reasons here based on the guidance supporting question three. Please be as specific and concise as possible in your response. You can explain what you would want addressed or changed in the next section.

Don't forget you can refer to supporting documentation which you can include with this submission.



5 - Please explain what further changes are needed to make the Local Plan sound.
Please suggest revised wording of policy or text.

Insert your content below

The policy requirement for water efficiency should be 100 litres per day per person.

5: PLEASE EXPLAIN WHAT FURTHER CHANGES ARE NEEDED TO MAKE THE LOCAL PLAN SOUND.

Having outlined your reasons in table four, this section provides the opportunity for you to set out what is required to make the local plan sound.



Legal Compliance:

6 - Which change to the Local Plan are you commenting on?

Field	Insert your content below
Please use a change reference where possible	All changes (i.e. DR1-01)

7 - With the change(s), do you consider this version of the local plan to be prepared in line with legal and procedural requirements?
Please see guidance notes.

Field	Please tick a single box below
Yes	
No	X

LEGAL COMPLIANCE:

6: WHICH CHANGE TO THE LOCAL PLAN ARE YOU COMMENTING ON?

By completing this section, we can best understand your comments. The Inspector will need to know exactly what change to the plan you are referring to as they can only consider comments on the proposed changes to the plan. The Local Plan document can be found at www.havant.gov.uk/localplan – please quote the change reference within the consultation document (e.g. DR1-0020). Your comment will need to be about the soundness or legal compliance of the local plan with the proposed changes.

As the changes may affect the overall likely social, economic, and environmental effect of the Plan, you may want to refer to the sustainability appraisal (SA) addendum to support your views. The SA addendum can be found on the website at www.havant.gov.uk/localplan/regulatory-requirements.

If you wish to comment on more than one change in the plan you will need to submit a separate comment form for each.



Legal Compliance:

6 - Which change to the Local Plan are you commenting on?

Field	Insert your content below
Please use a change reference where possible	All changes (i.e. DR1-01)

7 - With the change(s), do you consider this version of the local plan to be prepared in line with legal and procedural requirements?
Please see guidance notes.

Field	Please tick a single box below
Yes	
No	X

7: WITH THE CHANGE(S), DO YOU CONSIDER THIS VERSION OF THE LOCAL PLAN TO BE PREPARED IN LINE WITH LEGAL AND PROCEDURAL REQUIREMENTS?

A plan is considered legally compliant when it has been prepared in line with the relevant legal requirements.

Key considerations include:

- Has the council duly engaged and cooperated with neighbouring authorities and other relevant bodies to address strategic issues under the 'duty-to-cooperate'? ¹
- Has the consultation been carried out in accordance with the council's Statement of Community Involvement?
(see www.havant.gov.uk/statement-of-community-involvement)
- Have the Sustainability Appraisal and Habitats Regulations Assessment been carried out correctly and sufficiently informed the Local Plan?

Legal compliance is ultimately about how we have prepared the Local Plan including the proposed changes. If your comment is about what the change says, then it is likely to be related to soundness.

¹ See paragraphs 24 to 27 in the National Planning Policy Framework https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf



8 - With the change(s) please give the reason(s) why you do or do not consider this version of the Local Plan to have been prepared in line with legal and procedural requirements?
Please be as specific and concise as possible in your response.

Insert your content below

The local plan has not been prepared in line with legal and procedural requirements because the changes to the Local Plan have only been subject to an update of the Sustainability Appraisal.

8: WITH THE CHANGE(S) PLEASE GIVE THE REASON(S) WHY YOU DO OR DO NOT CONSIDER THIS VERSION OF THE LOCAL PLAN DOCUMENT TO HAVE BEEN PREPARED IN LINE WITH LEGAL AND PROCEDURAL REQUIREMENTS.

Please summarise your reasons here based on the guidance supporting table seven. **Please be as specific and concise as possible** in your response. You can explain what you would want addressed or changed in the next section.

Don't forget **you can refer to supporting documentation** which you can include with this submission in Part C.



9 - Please explain what further changes are needed to make the Local Plan legally compliant.
Please suggest revised wording of policy or text.

Insert your content below

To make the plan legally compliant the Sustainability Appraisal should be done again. This should be a full Sustainability Appraisal of the whole plan, rather than an update to the 2019 appraisal.

9: PLEASE EXPLAIN WHAT FURTHER CHANGES ARE NEEDED TO MAKE THE LOCAL PLAN LEGALLY COMPLIANT.

Having outlined your reasons in table eight, this section provides the opportunity for you to set out what is required to make the local plan legally compliant.



10: DO YOU NEED TO APPEAR AT THE EXAMINATION HEARINGS?

Please indicate your preference here. If you choose yes, please make sure you have set out what is required to make the Local Plan legally compliant and/or sound in tables five and nine.

Be aware that your **comments within this form will carry the same weight as any evidence presented** at the examination hearings. It is the Inspector's choice as to who is invited to appear at the hearings.

11: IF YOU WISH TO APPEAR BEFORE THE INSPECTOR AT THE EXAMINATION HEARINGS, PLEASE EXPLAIN WHY THIS IS NECESSARY.

This is your opportunity to explain what benefit your attendance at the hearings will have. As your comments within this form will carry the same weight as any evidence presented at the examination hearings please explain why it is necessary for you to appear at the hearings as opposed to simply submitting your written representation.

Please note there is no guarantee you will be invited to the examination. Invitations will be at the discretion of the Inspector.



10 - Do you need to appear at the examination hearings?

Field	Please tick a single box below
Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

11 - If you wish to appear before the inspector at the examination hearings, please explain why this is necessary

Insert your content below

It is necessary to participate because...

12 - Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Field	Please tick a single box below
Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

13 - Please confirm the date that this form was completed.

Field	Insert the date of completion below
Date	20 09 2020

12: DO YOU WANT TO BE NOTIFIED OF THE FOLLOWING:

Havant Borough Council is committed to the transparency of the Local Plan process and ensuring stakeholders are kept up to date.

We will contact you with the details that you provide in table one if you have requested to be notified of the next stages in the Local Plan process.

This information will also have to be submitted to the Planning Inspectorate in order for us to fulfil our legal obligations and for an effective examination to take place. There is more detail in the form and in our Privacy Notice which is available at www.havant.gov.uk/service-privacy-notices.

Your details will be kept secure in line with the council's Privacy Notice and the Planning Policy Privacy Notice and used in a manner compliant with the General Data Protection Regulation. Further details can be found at www.havant.gov.uk/privacy-policy.

13: PLEASE CONFIRM THE DATE THAT THIS FORM WAS COMPLETED

We will require confirmation of when the form was completed and submitted to the council.



10 - Do you need to appear at the examination hearings?

Field	Please tick a single box below
Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

11 - If you wish to appear before the inspector at the examination hearings, please explain why this is necessary

Insert your content below

It is necessary to participate because...

12 - Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Field	Please tick a single box below
Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

13 - Please confirm the date that this form was completed.

Field	Insert the date of completion below
Date	20 09 2020

PART C: SUPPORTING DOCUMENTS

14 - Please list any supporting documents that you are submitting with this form.

Insert your content below

One document in Word format:

Title: Alex-Smith-Supporting.doc

PART C: SUPPORTING DOCUMENTS

Please list all supporting documentation included with your submission, so the Inspector can confirm they have all materials relating to your submission. Any documents that you are submitting should **clearly relate to your comments** and be **clearly referenced in your answers** above.



Please email the completed document to **policy.design@havant.gov.uk**. A hand completed form can be returned to the address below.

Where applicable, please indicate any supporting documents you are submitting alongside your comments in Part C.

The Planning Policy Team can be contacted on **023 9244 6019** with any queries you may have.

The closing date for completed forms is 4pm on 17 December 2020.

Planning Policy Team

E: policy.design@havant.gov.uk

Public Service Plaza, Civic Centre Road, Havant, Hampshire, PO9 2AX