ENQ 18672

[redacted]

HAVANT BOROUGH COUNCIL
13 AUG 2026
RECEIVED

The Chief Executive
Havant Borough Council
The Plaza,
Civic Centre Road
Havant
Hampshire
PO9 2AX

12 August 2026

For the Attention of the Chief Executive, Havant Borough Council

Dear Sir/Madam,

Re: Building a Better Future Plan – Regulation 19 Representation

Site Reference: The Horsefield (EM08a)

I am writing to submit a formal objection to the Regulation 19 consultation regarding the late inclusion of Site EM08a (The Horsefield) in the draft Local Plan.

During the preceding public consultation, Senior Planning Officers and local Ward Councillors formally reassured residents that Site EM08a would be excluded from the Local Plan due to its statutory protected status within a designated National Landscape. No material changes in circumstances have occurred since that determination. However, the site has been reintroduced at an advanced stage without sufficient justification, evidence, or transparent rationale.

Given that housing target deficits were present during the previous consultation phase and remain comparable today and noting that the proposed allocation only represents approximately 1% of the overall housing requirement, the Council's reversal of position requires complete clarification.

I submit that the inclusion of Site EM08a renders the Local Plan unsound and legally non-compliant on the following grounds:

- **Breach of National Planning Policy Framework (NPPF):** Paragraphs governing National Landscapes mandate that great weight must be given to conserving landscape and scenic beauty. Major development within these areas should be refused save for exceptional circumstances. Planning Practice Guidance confirms that housing supply shortfalls do not constitute exceptional circumstances overriding statutory environmental protections.
- **Failure of Statutory Duty:** Section 245 of the Levelling-up and Regeneration Act 2023 enhances the statutory duty on relevant authorities to "seek to further" the conservation

and enhancement of National Landscapes. The proposed allocation fails the exceptional circumstances test and directly breaches this statutory obligation.

- **Procedural Irregularities and Unsoundness:** The modification of Policy 30 appears to construct an arbitrary policy exception specifically tailored to accommodate Site EM08a. This directly contradicts the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), which previously deemed the site unsuitable for development. Re-evaluating the site without new supporting evidence undermines the transparency of the process and indicates predetermination prior to independent examination.
- **Infrastructure and Environmental Constraints:** The site exhibits severe physical and environmental constraints, including documented surface water flood risk and proximity to a Site of Importance for Nature Conservation (SINC). Local wastewater infrastructure is operating at capacity such that during heavy rainfall we are unable to flush our toilets (which is a public health hazard) and contributes to documented storm overflow discharges into Chichester Harbour. Furthermore, development would erode a designated Strategic Green Gap, worsen existing congestion on the A259, and establish a harmful precedent for protected land within the Chichester Harbour Conservancy.

To ensure compliance with national policy and fulfil statutory obligations toward the National Landscape, the restrictive phrasing within Policy 30 must be amended and Site EM08a must be removed from the draft Local Plan.

As currently drafted, the Plan is unsound and legally non-compliant. Proceeding with these unsustainable modifications creates a substantial risk that the Planning Inspector will find the Local Plan unsound in its entirety.

Please acknowledge receipt of this representation and confirm that it will be formally submitted to the Planning Inspectorate for independent examination.

Yours faithfully,

[redacted]

Mrs Jacqueline Gillespie

[redacted]

UPLOADED 25/08
Ref: 304093003

Applicant details

Full name	Mrs Jacqueline Gillespie
Home address	, ,
Preferred contact method	Telephone
Email address	[redacted]
Telephone (Mobile)	
Telephone (Home)	-
Telephone (Work)	-
Contact method for this case	Webform
Details	[redacted]

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Mrs Jacqueline Gillespie
[redacted]

CSC response -

Parent CASE Please type to search...

Service Case Ref	Full Name	Date created

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