UPLOADED 25/8
Ref: 304124057

LOCAL PLAN PRE-SUBMISSION CONSULTATION
PLANNING SERVICE
HBC
PUBLIC SERVICE PLAZA
CIVIC CENTRE RD
HAVANT PO9 2AX

HAVANT BOROUGH COUNCIL
20 AUG 2026
RECEIVED

[redacted]

August 19th, 2026

Dear Sirs,

REF: LOCAL PLAN – HORSEFIELD SITE EM08A - UNSOUND AND NOT LEGALLY COMPLIANT

We believe the proposed Local Plan regarding The Horsefield Site (EM08A) is both unsound and not legally compliant.

The Horsefield land lies inside the Chichester Harbour National Landscape, all National Landscapes have legal protection against major development (National Planning Policy paragraph 190). This paragraph states that major development should be refused **unless there are exceptional circumstances and unless it is shown to be in the public interest.**
No such evidence has been published, therefore HBC has a legal duty to further the conservation and enhancement of this landscape.
This area of outstanding natural beauty and biodiversity is enjoyed by the local community and previous planning applications have been refused given it is protected land.

We also understand that HBC has rewritten Policy 30 (Chichester Harbour National landscape) to facilitate such site allocations **without** meeting the National Planning exceptional circumstances test. This is both unsound and not legally compliant.

There is a wider concern that if protected land such as this Horsefield site can be allocated for development without the necessary national test being met, other protected sites are at risk across the Chichester Harbour area and wider borough.

It is not acceptable to the local community who should be represented fairly and who trust their local planning representatives to act within an established national legal framework, that a valued, well- loved national landscape is not being protected as it should. I would go further and say that HBC are guilty of a dereliction of duty.

Therefore, we would ask that HBC corrects the following:

Removes **EM08A** from the site allocation

Removes the phrase '**other than where allocated within this Local Plan'** from Policy 30.

We would expect that without these amendments, the Government Inspector who assesses the soundness and legal compliance of the Local Plan, will have no option but to reject the Plan.

Yours sincerely

[redacted]

Melanie and Brian Martin