UPLOADED 27/8
Ref: 304231580

Havant
BOROUGH COUNCIL

Part A - Personal Details

1. Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client – please select one option.

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26 AUG 2026
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☑ I am completing this form myself

☐ I am an agent completing this form on behalf of a client

If you are completing this form yourself, please go to Section 3 below.

If you are an agent completing this form on behalf of a client, please go to Section 4 (on page 4).

Section 3. Personal Details (Completing form on own behalf)

2. Please provide the following personal details.

Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.

The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process.

Title	MS.
First Name	KRYSIA
Last Name	CWIKLA
[redacted]	

[redacted]

3. Please provide the following details where applicable and/or relevant

Job Title

Organisation

Once you have completed this section, continue to page 6 of this form.

Section 4. Personal Details (Agent on client's behalf)

4. If an agent is appointed, please provide the following information:

Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.

The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process.

Title

First Name

Last Name

Job Title

Organisation	
Address Line 1	
Address Line 2	
Postcode	
Telephone Number	
Email Address	

5. Please provide the following information about the client for whom you are completing this form on their behalf

Title	
First Name	
Last Name	
Organisation (if applicable)	

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5. Part B - Your representation(s)

Please complete this section of the form for each representation you wish to make on the Building a Better Future Plan.

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

This form allows you to submit one representation on the Building a Better Future Plan. If you wish to submit a representation on a separate part of the Plan, please complete this form in its entirety and then start a new form for your separate representation.

6. Which part of the Building a Better Future Plan does your representation relate to?

Please provide as much detail as possible.

If you wish to make a change to the Policies Map, please comment on the corresponding policy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form

A full list of policies and allocations can be found in the contents page(s) of the Publication Plan.

Policy Number	30.
Allocation Number	SITE EMOBa (The Horsefield)
Paragraph Number	190
Page Number	98 253

7. Do you consider the Local Plan is ...

(Please select as appropriate)

	Yes	No
Legally compliant	☐	☑
Sound	☐	☑

8. Please give details of why you consider the Building a Better Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

You are welcome to attach additional pages to your response form.

The "Building a Better Future" Plan (Reg. 19), in my opinion, is clearly unsound and not legally Compliant, in regard to The Horsefield in Emsworth, site EM08A.

This site, part of an Area of Outstanding National Beauty for many years (I have lived in Emsworth for over 40 years and clearly remember local AONB and SSSI sites) and now part of Chichester Harbour National Landscape, was added to the above 'Plan' in May 2026.

In order to be able to do this, Havant Borough Council REWROTE Policy 30, page 253,

which had required exceptional circumstances to be demonstrated in order to enable major development to take place. Without this requirement of proof, I believe HBC feels free to develop where it chooses.

[I also think that building on Green Belt land – never meant to be developed – was one of the first steps towards a coastal suburb and an end to any distinction between villages and towns along the South Coast. Development of The Horsefield will be another such step.]

By rewriting Policy 30, HBC has avoided having to show clearly (p.98) the "exceptional circumstances" required for any major development, such as the 90-house proposal for the Horsefield site, by the National Planning Policy.

9. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You are welcome to attach additional pages to your response form.

The conservation and protection of Chichester Harbour National Landscape is a duty to which, by Law, Havant Borough Council, is bound. The development of 90 houses on the Horsefield Site EM08A will be no enhancement of what was previously part of a designated AONB.

No evidence has been published to show that this development is, in any way, in the public interest. Nor have "exceptional circumstances" been shown as to why it should go ahead.

Therefore, according to Paragraph 190 of the National Planning Policy, the Horsefield development should be refused: it is protected by law.

If this lawfully protected site, EM08A, becomes allocated for development, a precedent is set. Without the national test of "Exceptional

circumstances" and "in the public interest" being met, any other protected site becomes at risk.

For ourselves and for future generations, Let us not set this precedent.

Therefore: The Horsefield EM08A needs to be taken off the site allocation.

Regarding Policy 30, the phrase "other than where allocated within this Local Plan (or)" needs to be removed.

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6. Examination Hearing Session Invitation

11. If your representation / representations are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in examination hearing session(s), you may be asked at a later point to confirm your request to participate.

No details on the examination hearing session(s) have yet been determined and will be made available upon the submission of the Building a Better Future Plan to the Planning Inspectorate.

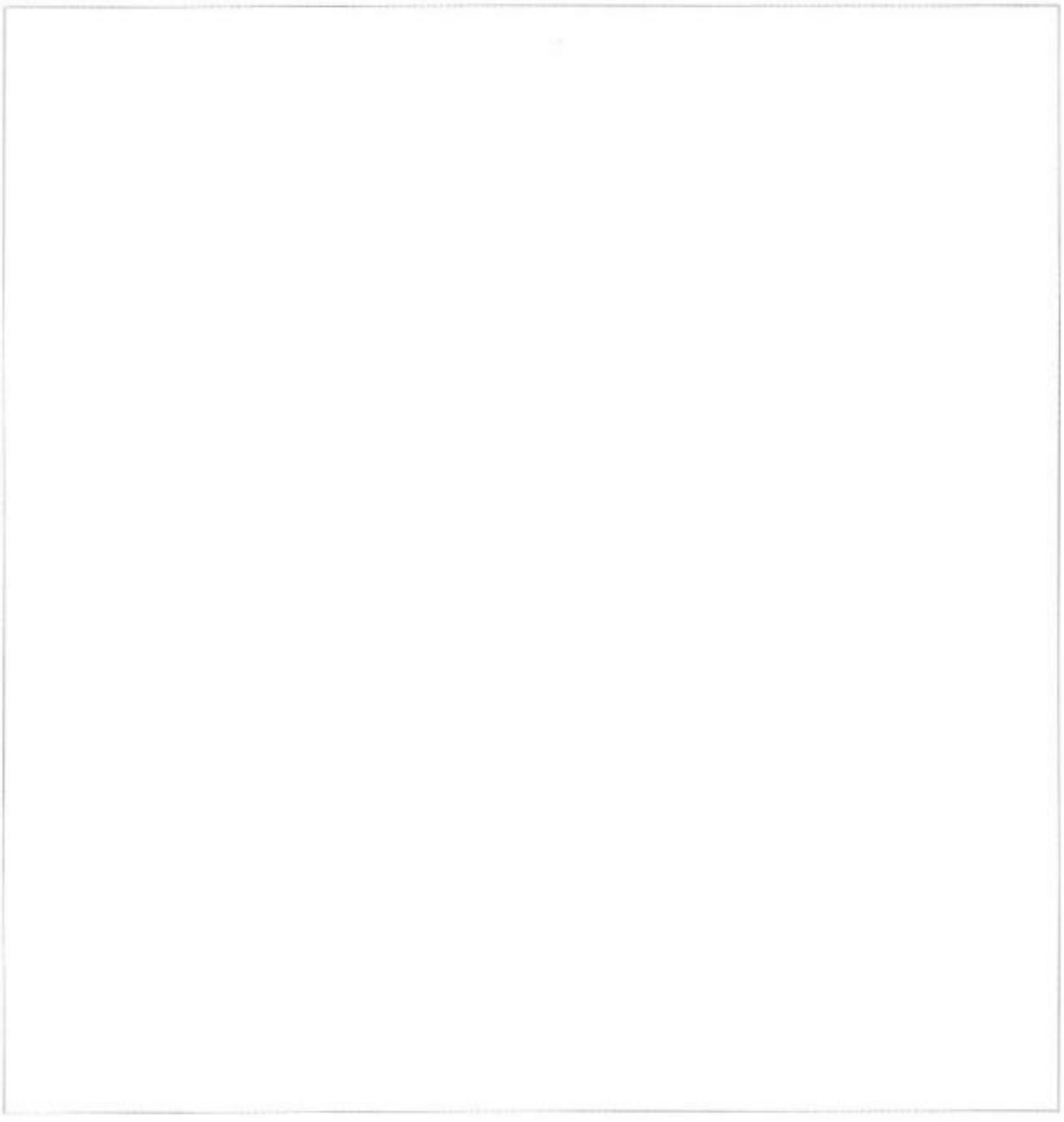
☐ Yes, I wish to participate in examination hearing session(s)

☑ No, I do not wish to participate in examination hearing session(s)

If you do not wish to participate in examination hearing session(s), please continue to page 13 of this form.

12. If you indicated that you wish to participate in the examination hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in examination hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



8. Future Notification

13. Do you wish to be notified of any of the following milestones in the Building a Better Future Plan process?

These milestones include:

- **The Local Plan has been submitted for examination**
- **The publication on the Inspector's Report**
- **The adoption of the Local Plan**

If you indicate that you wish to be notified, the email address you provided in Part A of the form will be used by the Council to notify you of these milestones.

☑ Yes, I wish to be notified

☐ No, I do not wish to be notified

Thank you for submitting your views to this important consultation.

Please use the pre-paid envelope provided with this survey to post your response back to Havant Borough Council by 9 September 2026.