Building a Better Future Plan - Representation Form

Part A - Personal Details

Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client
I am completing this form myself

Part A - Personal Details (Completing form on own behalf)

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. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

Title	Miss
First Name	Georgina
Last Name	Farmer

[redacted]

Please provide the following details where applicable and/or relevant
No Response

Part A - Personal Details (Agent on client's behalf)

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. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.
No Response

Please provide the following information about the client for whom you are completing this form on their behalf
No Response

Part B - Your representation(s)

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 p olicy, 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 - you can access this document here.

Policy Number	-
Allocation Number	Allocation 3
Paragraph Number	-
Page Number	-

Do you consider the Local Plan is ...
(Please select as appropriate)

	Yes	No
Legally compliant		X
Sound		X

Please give details of why you consider the Building a Better Plan is not legally compliant o r 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.

I object to Allocation 3 (EM08a) being included in the Regulation 19 Local Plan. The site lies within the Chichester Harbour National Landscape, but Havant Borough Council (HBC) has not clearly shown that exceptional circumstances exist or that development here is in the public interest, as required by the NPPF. In simple terms, the Council should have explained why this protected site is needed and why less harmful alternatives could not meet the need before allocating it. As HBC have reworded Policy 30 the will also be avoided at the application stage.
I also do not believe the allocation is justified or legally sound. It appears to conflict with policies that protect valued landscapes and avoid harm to protected areas. The Council also has a legal duty under section 85 of the Countryside and Rights of Way Act 2000 to help further the purposes of the National Landscape, but I have not seen evidence showing how that duty was properly considered before EM08a was added.
There are also serious concerns about the process. The February 2026 SHELAA told the public that the site had been discounted, yet the site later appeared as an allocation. Nearby residents were not properly notified, and Chichester Harbour Conservancy was only informed after the site had effectively been brought forward. This gave local people and relevant bodies too little opportunity to comment at the right time.
The evidence also seems incomplete. The Plan does not clearly explain how the environmental, landscape, traffic, drainage, community, and sustainability impacts of this specific site were assessed before it was selected. It is therefore difficult to see how the Council reached a sound decision to allocate EM08a.
The allocation also appears inconsistent with the Council's own Plan. The Plan says protected landscapes should be avoided unless strict tests are met, yet EM08a has been allocated without showing that those tests have been satisfied.
Finally, the site is close to important wildlife habitat used by protected Brent Geese, Curlew, and Solent Waders. The Council's own assessment says that disturbing supporting habitat is likely to harm protected conservation objectives, but no proper site-specific displacement assessment appears to have been carried out. For all these reasons, I believe Allocation 3 is not positively prepared, not justified, not legally compliant, and is unsound.

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.

Remove Allocation 3 from the HBC Local Plan

If you wish to upload any documents to support your representation, please do so below. Please note that there is a maximum file size of 50MB and you can upload a maximum of 10 files to include with your form.

No Response

Examination Hearing Session Invitation

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.

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

Examination Hearing Session Invitation (2)

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.

No Response

Future Notification

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