Uploaded 08/09/26
Ref: 305653220

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.

HAVANT BOROUGH COUNCIL
01 SEP 2026
RECEIVED

☑ 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	MRS
First Name	JUDE
Last Name	HONEY
[redacted]	

[redacted]

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

[redacted]

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)	

Havant
BOROUGH COUNCIL

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	EM08a (No3)
Paragraph Number	ALL
Page Number	98/E253 ALOUGH INCONSISTENT. DEPENDING ON DEVICE

Havant
BOROUGH COUNCIL

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.

SITE EM08a THE HORSEFIELD

THE BUILDING A BETTER FUTURE PLAN IS BOTH NOT LEGALLY COMPLIANT & UNSOUND BASED ON THE FOLLOWING.

BREACH OF NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

THIS ALLOCATION DIRECTLY CONFLICTS WITH THE NPPF.

IT FAILS TO CONSERVE & ENHANCE
" " " PROTECT BIODIVERSITY NETWORKS
" " " DIRECT DEVELOPMENT ~~AA~~ AWAY FROM FLOODING RISK

FAILURE OF STATUTORY DUTY

SECTION 245 OF THE LEVELLING UP & REGENERATION ACT 2003 ENHANCES THE STATUTORY DUTY TO SEEK TO FURTHER THE CONSERVATION & ENHANCEMENT OF NATIONAL LANDSCAPES

THE INCLUSION OF EM08a DIRECTLY BREACHES THE STATUTORY OBLIGATION & FAILS THE EXCEPTIONAL CIRCUMSTANCES TEST AS PLANNING PRATICE GUIDANCE CONFIRMS THAT HOUSING SUPPLY SHORTFALLS DO NOT CONSTITUTE EXCEPTIONAL CIRCUMSTANCES OVERRIDING STATUTORY ENVIRONMENTAL PROTECTIONS.

PROCEDURAL FAIRNESS

P.T.O

EMO8a WAS ADDED AFTER THE INITIAL PUBLIC CONSULTATION. WHERE SENIOR PLANNERS & COUNCILLORS REPEATEDLY ASSURED THAT THIS SITE WOULD NOT BE INCLUDED DUE TO ITS PROTECTED STATUS. BEING INCLUDED AT THE 11TH HOUR LEFT VERY LITTLE TIME FOR RESEARCH & UNDERMINES THE PROCEDURAL INTEGRITY.
THE CHANGING OF POLICY SO APPEARS TO CONSTRUCT AN ARBITRARY POLICY EXCEPTION SPECIFICALLY TAILORED TO ACCOMODATE THIS SITE. THIS DIRECTLY CONTRADICTS THE COUNCIL'S STRATEGIC HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT, WHICH PREVIOUSLY DEEMED IT UNSUITABLE FOR DEVELOPMENT. RE-EVALUATING THE SITE WITHOUT NEW SUPPORTING EVIDENCE UNDERMINES THE TRANSPARENCY OF THE PROCESS & INDICATES PREDETERMINATION PRIOR TO INDEPENDENT EXAMINATION
GENUINE COMMUNITY FEEDBACK REGARDING MAJOR LANDSCAPE CONSTRAINTS HAS BEEN BYPASSED RATHER THAN LEGALLY INTEGRATED INTO THE DECISION MAKING PROCESS
INFRASTRUCTURE & ENVIRONMENTAL CONSTRAINTS
THIS SITE CONSTANTLY FLOODS, WASTEWATER INFRASTRUCTURE IS OPERATING ALREADY AT OVER CAPACITY WE CANNOT FLUSH OUR TOILETS DURING HEAVY RAINFALL & OVERFLOW DISCHARGES INTO CHICHESTER HARBOUR. CLIMATE CHANGE WILL ALSO EXACERBATE THIS.
THE DEVELOPMENT OF THIS SITE WOULD ERODE THE DESIGNATED STRATEGIC GREEN GAP & WORSEN THE EXISTING CONGESTION ON THE A259
IT WOULD ALSO CREATE A DOMINO EFFECT ON PROTECTED LAND WITHIN CHICHESTER HARBOUR CONSERVANCY & COUNTRY WIDE

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.

1) REMOVE SITE E1087a FROM THE LOCAL PLAN

2) RE-DESIGNATE THIS SITE TO PERMANENTLY PROTECT ITS STATUS

3) AMEND POLICY 30 TO EXCLUDE "OTHER THAN WHERE ALLOCATED WITHIN THIS LOCAL PLAN"

4) BY INCLUDING THIS SITE, THE WHOLE PLAN IS IN DANGER OF BEING THROWN OUT BY THE PLANNING INSPECTOR AGAIN AS THIS INCLUSION MAKES THE PLAN UNSOUND & LEGALLY NON COMPLIANT



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.

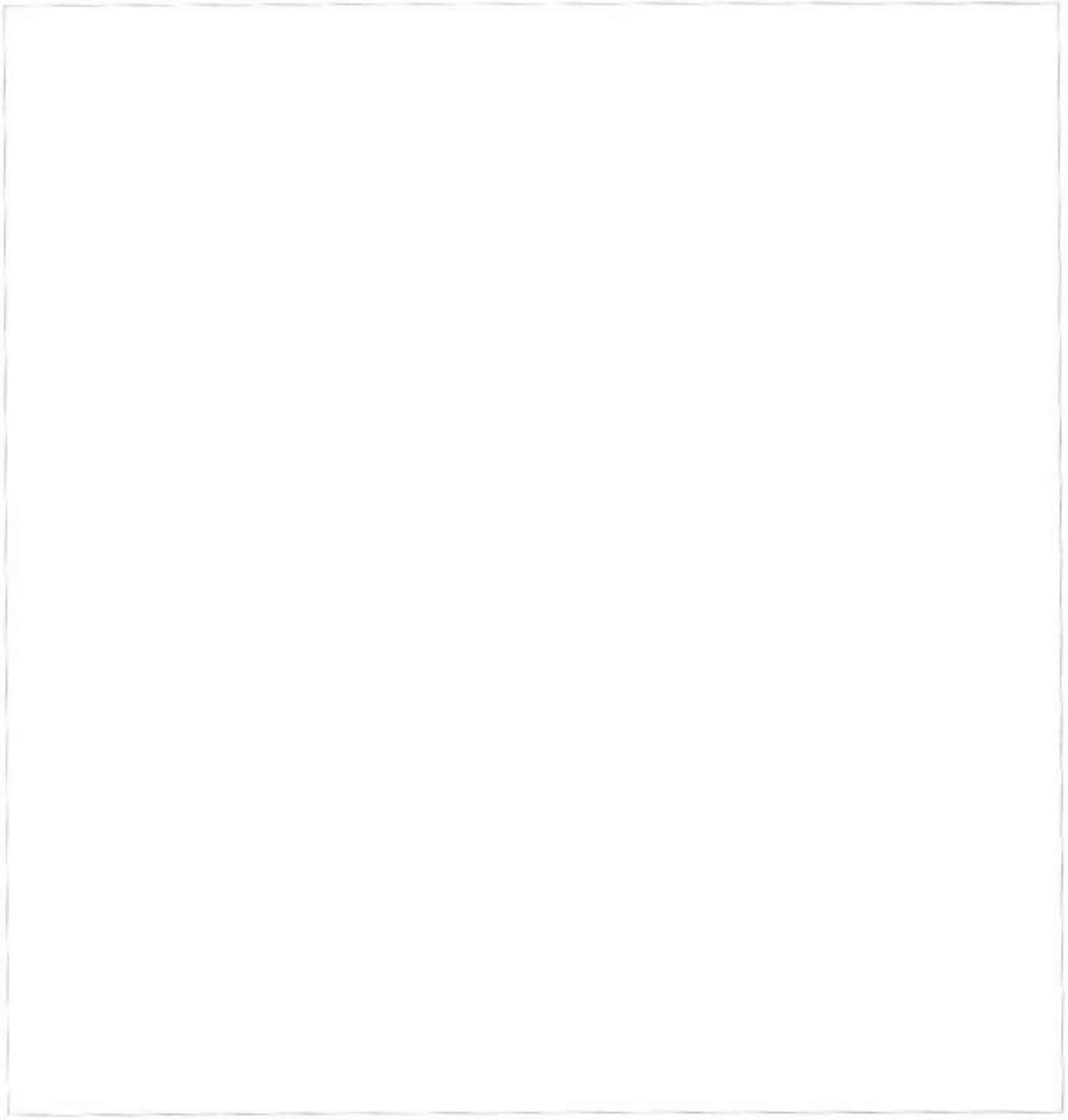
☑ Yes, I wish to participate in examination hearing session(s)

☐ 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.