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	Mrs
First Name	Anna
Last Name	Potter



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	30
Allocation Number	-
Paragraph Number	-
Page Number	253

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.

Policy 30 is not consistent with national policy and is not effective. It exempts sites allocated within this Local Plan from the exceptional circumstances test that NPPF paragraphs 187-189 require for major development in a National Landscape. That exception did not appear in the April 2026 draft (then Policy 31); it was added afterwards. It has exactly one beneficiary - Allocation 3, the only allocation in the whole Plan lying within a National Landscape. The Council's position is that the test is applied at application stage. Policy 30 disapplies it at application stage. The test is therefore never applied at all. The Sustainability Appraisal at Appendix C appraised Policy 30 as a policy that prevents major development in the National Landscape - not the policy as published.

Please set out the modification(s) you consider necessary to make the Local Plan legally c ompliant and sound, in respect of any legal compliance or soundness matters you have ide ntified above.
You will need to say why each modification will make the Local Plan legally compliant or so und. 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.

Delete Policy 30 the words "where allocated within this Local Plan or".

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 1 0 files to include with your form.

- File: 23. (2026.04.) Emails to inform our discussion about the Chichester Harbour management plan - Attachment - RE Further feedback - Attachment - HBC Local Plan.pdf - Download
- File: 24. (2026.04.22-05.15.)RE Copies of versions of the Harbour Management Plan_Redacted.pdf - Download

Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consi der 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 exa mination hearing session(s), you may be asked at a later point to confirm your request to p articipate.
No details on the examination hearing session(s) have yet been determined and will be ma de available upon the submission of the Building a Better Future Plan to the Planning Inspe ctorate.

Yes, I 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 out line why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear th ose who have indicated that they wish to participate in examination hearing session(s). Yo u may be asked to confirm your wish to participate when the Inspector has identified the m atters and issues for examination.

The wording of the modification I seek is previse and may need to be refined in discussion with the Council and the Inspector.

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 f orm will be used by the Council to notify you of these milestones.

Yes, I wish to be notified

HBC DRAFT LOCAL PLAN POLICY APRIL 2026 – SUGGESTED CHANGES:-

Policy 31: Nationally Protected Landscapes

Chichester Harbour National Landscape

Major development will not be permitted within Chichester Harbour National Landscape, other than in exceptional circumstances.

Planning permission for any other development will only be granted where it is demonstrated that the proposal:

a) Furthers the purpose[1] of designation by conserving and enhancing the natural beauty[2] and the special qualities of the National Landscape as defined in the Chichester Harbour National Landscape ~~AONB~~ Management Plan[3]; and

b) Meets the policy aims of the ~~up-to-date~~ Chichester Harbour National Landscape Management Plan; and

~~c) Provides mitigation for any detrimental effects caused by the proposal and, where appropriate, secures additional landscape enhancements; and~~

c) Is appropriate to the economic, social and environmental wellbeing of the area or is desirable for the understanding and enjoyment of the area.

d) Where it is outside but within the setting of the National Landscape, is sensitively located and designed to avoid or minimise adverse impacts on natural beauty[4] (including views into and out of the National Landscape[5]).

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[1] This reflects the implications of the new statutory duty to seek to further the purpose of protected landscape designation (i.e., in the case of national landscapes, to conserve and enhance the natural beauty of these areas). Similar wording is used in the National Landscape Association's guidance on the 'seek to further' duty (link).

[2] This reflects the statutory purpose of national landscape designation, which is to conserve and enhance the natural beauty of the area, as set out in Section 82 of the Countryside and Rights of Way Act 2000 (link).

[3] The 'special qualities of the Chichester Harbour National Landscape are listed in Section 1 of the Chichester Harbour National Landscape Management Plan 2025-2030 (link) The 'special qualities' of a national landscape are those aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. They are the key attributes on which the priorities for the area's conservation, enhancement and management should be based.

[4] This reflects the requirement, in paragraph 189 of the National Planning Policy Framework, that '*development within their setting should be sensitivity located and designed to avoid or minimise adverse impacts on the designated areas*'.

[5] This reflects the advice in Paragraph 042 of the National Planning Practice Guidance on how development within the setting of National Landscapes should be dealt with (link)

From: [redacted]@havant.gov.uk>
Sent: 19 May 2026 13:23
To: [redacted]
Cc: [redacted]
Subject: RE: Copies of versions of the Harbour Management Plan

Good afternoon both

Apologies for the slight delay getting you an update, there's been some leave within the team and we've wanted to make sure we had firm advice in terms of the situation.

Firstly, [redacted] is coming back to you [redacted] re the local plan policy. We completely accept that setting is a material consideration and apologies that this was missed out of the initial draft. This is exactly why we're engaging with the statutory consultees at this point, prior to any pre-submission consultation.

Regarding the Management Plan, apologies if it was unclear, the point around setting and Planning Principle 01 was an example rather than the sole consideration at this point – however is probably the planning principle where we've got the most concerns overall. I would suggest that we also consider the new NPPF as well. Thank you very much for wanting to work with us to update the current draft and make sure that it's high quality and robust.

What would be helpful would be perhaps for us to do a full assessment of where there are concerns etc and to then discuss those collectively and work together on any updates.

In the meantime, we're conscious that there are live planning applications where this will be a material consideration (notably Tournerbury Woods and the Langstone FCERM scheme). As you know, approval of the Management Plan is a delegated matter to officers through our constitution. So what we'll be doing is taking a report through that route which sets out that further work and discussion is needed with yourselves in order to be in a position to adopt the Management Plan. This will ensure that in making decisions, we can be clear and justified on the level of weight that should be afforded to different material considerations.

I hope that's a helpful update.

Many thanks

[redacted]

[redacted]

Strategic Planning Manager | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

In August 2025, the council moved to a new case management system, across Planning Development, Licensing and Environmental Health. This change involved moving 25 years' worth of data from multiple systems into one new system and learning how to use the new system. Officers have worked hard to resume normal working but a small backlog remains and our response times may be longer than usual.

Thank you for your understanding and patience.







More details at www.havant.gov.uk/nitrogen



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From: [redacted]@conservancy.co.uk>
Sent: 27 April 2026 12:04
To: [redacted]@havant.gov.uk>; [redacted]@conservancy.co.uk>
Subject: RE: Copies of versions of the Harbour Management Plan

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Dear [redacted],

[redacted] has passed me your correspondence regarding the National Landscape Management Plan and specifically querying Planning Principle PP01 (Great Weight for a Nationally Important Landscape).

Your point about point number 5 of the Policy is accepted, I have to admit it does go further than the NPPF in suggesting that any additional housing within the setting of the National Landscape should be within settlement boundaries. Can I suggest that the words 'or its setting' are deleted, and that we add an additional sentence to the end of Planning Principle 01 (5).

From (p41):

5. *All new developments for a net increase in dwellings within the National Landscape or its setting are to be within existing settlement boundaries.*

To:

5. *All new developments for a net increase in dwellings within the National Landscape are to be within existing settlement boundaries. Those within its setting are to be sensitively located and designed to avoid adverse impacts.*

This would be consistent with paragraph 189 of the NPPF.

Your colleague [redacted] has kindly reached out to us for further comments on 4 policies from the draft Building a Better Future Plan, including draft Policy 31 on Nationally Protected Landscapes. I will respond separately directly to [redacted] on this, but the issue of setting remains absent from the Policy, despite it being within existing Core Strategy Policy CS12, within CDC's policy on the National Landscape from their recently adopted Local Plan (Policy NE14) and it being covered in paragraph 189 of the NPPF and paragraph 042 of the NPPG as below:-

NPPF – Chapter 15 Conserving and enhancing the natural environment

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks

and the Broads[66]. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

NPPG – Landscape

How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

Paragraph: 042 Reference ID: 8-042-20190721

Revision date: 21 07 2019

Setting refers to areas where new development might still have an impact on the natural beauty of the National Landscape, essentially, where it is visible from the National Landscape to a degree that impacts its natural beauty and the person's experience/impression of the National Landscape, or where views into the National Landscape from outside its boundary are impacted. Examples of areas within the Havant Borough where the setting of the National Landscape may be impacted include the

houses immediately north of Western Parade and along this stretch of the coast where the National Landscape boundary skirts around the built area, but where buildings close to the coastline are visible from a wide area and for long distances from within the National Landscape. Other examples include north Hayling, potentially as far inland as Northney village, given that there are open fields between the National Landscape boundary and the buildings here and therefore high intervisibility.

I have screen-shotted a map from the previous version of the AONB SPD (Design Guidelines For New Dwellings and Extensions 2010) which illustrates this point on the Havant Borough side with red stars marking areas outside the National Landscape boundary where new development may have an impact on the setting of the National Landscape:-



It is really important that setting is included in the new Policy on Nationally Protected Landscapes within the Building a Better Future Plan for the reasons explained, although as stated, we will be responding directly to [redacted] on this point. We note that reason 1 of HBC's recent refusal (APP/25/00937) for a permanent café within the car park off Havant Road just outside the National Landscape related to impact on the landscape and scenic beauty of the National Landscape - this is another example of a site very close to the boundary where there is potential impact on the setting of the National Landscape. The vast majority of the Borough would not fall within the setting of the National Landscape.

Thank you for raising the point about Planning Principle PP01 of the National Landscape Management Plan - hopefully the suggested tweak to point number 5 will enable you to adopt the Plan as soon as possible, but please do let [redacted] and me know if there are any further concerns or queries.

Regards,

[redacted]

[redacted]
Principal Planning Officer
Please note I work part time – Monday to Wednesday



From: [redacted]@havant.gov.uk>
Sent: 24 April 2026 09:30
To: [redacted]@conservancy.co.uk>
Subject: RE: Copies of versions of the Harbour Management Plan

Hi [redacted]

Thank you, that's really helpful and thank you for being so clear. And appreciate the time you sent this.

We're discussing internally the week after next as on leave next week. I think in hindsight, it would have been useful to have a local authority discussion around the changes to the management plan prior to taking forward for adoption, but certainly appreciate your willingness to consider changes.

For avoidance of doubt, not suggesting for a second that we would not look to give great weight to the protection and enhancement of the National Landscape through both LP and DM decisions. It is the last point of PP01 which has flagged for us – its definitive nature, that it is set out as directional rather than the Conservancy's position, that it extends to the setting of the National Landscape and what appears to be a conflict with the NPPF. That this principal extends to the setting of the national landscape would affect quite a large area of the Brough and many sites and projects which are part of our Corporate Strategy and emerging Local Plan.

We'll discuss internally and will drop you a line after that. It might be quite sensible to have a discussion at that point and work out the best way forward.

I'm on leave next week as I said, but if there's anything you need to touch base on, [redacted] and [redacted] in the team are aware of the situation on this.

Many thanks

[redacted]

[redacted]

Strategic Planning Manager | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

In August 2025, the council moved to a new case management system, across Planning Development, Licensing and Environmental Health. This change involved moving 25 years' worth of data from multiple systems into one new system and learning how to use the new system. Officers have worked hard to resume normal working but a small backlog remains and our response times may be longer than usual.

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From: [redacted]@conservancy.co.uk>
Sent: 23 April 2026 22:08
To: [redacted]@havant.gov.uk>
Subject: RE: Copies of versions of the Harbour Management Plan

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Hi [redacted],

Ok in short, the consultation draft did not include the Planning Principles. Multiple Parish Councils on the Chichester side responded to the consultation asking for them to be reinstated. The Member-led Task & Finish Group we put-together (inc. Cllr Andy Briggs) concurred with the feedback so they were put back in the Management Plan. However, we reduced them from 19 Principles down to 7 Principles, as part of a prioritisation process. I also made great effort in the published Plan to make it clear these are not Planning Policies – they are designed to help interpret Local Plan policies.

On the topic of whether we should have gone back out to consultation, I was opened minded about the proposal given the extent of the changes, however the T&F Group were against it and cited over-consultation as a reason – the public have had their say now we must get on with publishing the

document. The Members understood this was 'only' a National Landscape Management Plan and is not subject to the same level of scrutiny as a Local Plan.

With regards to PP01 , of everything in the current Management Plan I would expect you to flag … this wouldn't be it! The LPA have a very clear duty to conserve and enhance NLs within their jurisdiction and that is the essence of PP01. Given the NL boundary, I feel there is very little that would affect HBC – especially given PINS direction on future development on Hayling Island.

As always, happy to discuss. If there's a showstopper in the Plan that's stopping HBC from adopting it – please do come back to me. Ultimately, I am after a document you are happy with, and if that means making further edits, I am fully prepared to do so. The document will not get sent to the SoS until all the LPAs have adopted it.

Kind regards, [redacted]

[redacted]
Director of Conservation
[redacted] / [redacted]

CHICHESTER HARBOUR CONSERVANCY
The Harbour Office, Itchenor, Chichester, West Sussex, PO20 7AW
01243 512301 | info@conservancy.co.uk | www.conservancy.co.uk

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From: [redacted]@havant.gov.uk>
Sent: 22 April 2026 17:01
To: [redacted]@conservancy.co.uk>
Subject: RE: Copies of versions of the Harbour Management Plan

Hi [redacted]

Thanks so much for sending those through – that's really appreciated. Appreciate the draft management plan might not be quite word for word the same one as the adopted.

Apologies for the delay in formally considering the adoption, I'm sure you can appreciate there's a lot of local plan and other work going on. One aspect of the management plan that we have picked up on reviewing the adopted draft is the level and scope of change compared to the draft which was consulted on.

We're discussing this internally but to help this, are you able to give a bit of insight into the reasons for the changes, particularly the 'planning principles'? Whilst some of the aspects they cover were addressed in the draft and are reflected in the NPPF, some aspects – particularly in PP01 – go beyond the NPPF and were not part of the draft.

Thanks in advance

[redacted]

[redacted]

Strategic Planning Manager | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

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From: [redacted]@conservancy.co.uk>
Sent: 22 April 2026 13:04
To: [redacted]@havant.gov.uk>
Cc: [redacted]@havant.gov.uk>; [redacted]@havant.gov.uk>
Subject: RE: Copies of versions of the Harbour Management Plan

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Hi [redacted],

Please find attached:

- CH Management Plan from 2009-2014
- Consultation draft of the Management Plan 2025-2030

With regards to the consultation draft, I struggled to find the exact document since it was replaced and updated after the consultation ended. The designer management to find this version, but I note it slightly predates the consultation window by a few weeks, so might not be exactly the same as the one that was published last May. Is that a problem? The designer seems to think it is the same version.

Now, with regards to current actual Management Plan that CDC have adopted (2025-2030), is HBC any closer to also doing so?

I have had to report to the full Conservancy twice that it is not yet adopted by HBC and from my perspective the sooner you guys can adopt it, the better.

Thank you, [redacted]

[redacted]
[redacted]
[redacted] / [redacted]

CHICHESTER HARBOUR CONSERVANCY
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From: [redacted]@havant.gov.uk>
Sent: 22 April 2026 11:59
To: [redacted]@conservancy.co.uk>
Cc: [redacted]@havant.gov.uk>; [redacted]@havant.gov.uk>
Subject: Copies of versions of the Harbour Management Plan

Hi [redacted]

Hope you're enjoying the sunny weather.

[redacted]

We've been looking at the precise wording of Policy CS12 and the resultant requirements of the development plan on the decision maker when considering applications. In particular, the reference to the AONB management plan. However we're very mindful that the management plan which was in place when the Core Strategy was adopted is very obviously a different one to the management plan in place when a decision is going to be made on this particular application.

As a result, we're looking to do a comparison in terms of the aims of the current management plan and that which was in place in March 2011. This will enable us to include commentary as to whether they are materially different or broadly comparable.

Do you have a copy of the management plan which was in place then at all?

It would also be very helpful to have a copy of the consultation draft of the recently adopted management plan if you're able to provide that as well?

Thank you in advance

[redacted]

[redacted]

Strategic Planning Manager | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

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