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

[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	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.

Allocation 3 is not justified. The site was discounted in the February 2026 SHELAA - and every previous assessment prior - and appeared as developable in the June 2026 revision with no published reasons for the change; the Council's answers of 24 August 2026 identified no erratum or addendum, and pointed to a pending information request rather than to a recorded reason. The landscape evidence is the site promoter's own submission, verified by a single officer email. No discrete assessment of exceptional circumstances exists. Reasonable alternatives were not appraised - the Sustainability Appraisal at Appendix C records that alternative approaches were not considered against all eight objectives. The allocation is immaterial to supply, and the phasing delivers nothing in the first five years.

See SHELAA Feb 2026: page 90 - EM08a discounted, EM08b discounted, page 91 (EM08a and EM08b) - discounted.
See SHELAA Jun 2026 - page 93 (EM08a and EM08b) - both sites discounted. p92 EM08b discounted. p46 EM08a 'developable'

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 Allocation 3 (Land south of Havant Road, EM08a) from the Plan, together with the consequential references in the housing supply tables and trajectory.

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: Screenshot 2026-09-06 at 20.09.24.png - Download
- File: Screenshot 2026-09-06 at 20.09.53.png - Download
- File: Screenshot 2026-09-06 at 20.04.57.png - Download
- File: Screenshot 2026-09-06 at 20.05.43.png - Download
- File: 8. SHELAA Feb 2026 Final Rev A(1).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 reasons for reversing the February 2026 discount have not been published and, in my view, can only be established by questioning the Council at a hearing.

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

[redacted]
Date: 16 July 2026 at 14:25:59 BST
[redacted]
Subject: re: Local Plan - Building a Better Future Plan - Allocation Site EM08a Horsefield

Dear Mr Kingdon

Thank you for getting in touch with our Chief Executive, [redacted] and thank you for your interest in the Building a Better Future Plan, the new Local Plan for Havant Borough. As you know, Full Council did consider the Local Plan at its meeting on 15th July.

The plan going forward remains for the consultation on the Publication Building a Better Future Plan to commence next week, and I would strongly encourage you to be part of that consultation and to respond. The responses that the Council receives to this consultation are sent directly to the inspector for them to consider through the examination and so this is the best opportunity to highlight legal compliance or soundness concerns.

As you acknowledge in your email to our Chief Executive, and in additional correspondence I have had sight of, Havant Borough is a constrained area. There are numerous planning constraints that result in this being a very difficult area to find sites to achieve sustainable development. A large amount of the Borough is at risk of flooding – and this will only increase with climate change – and there are significant ecological constraints and heritage designation. As you rightly point out, part of Hayling Island and Southern Emsworth are also within the Chichester Harbour National Landscape and development outside of that area may well be within its setting.

As a result of these constraints, meeting the very high need for new development – both housing and commercial development – is very challenging. It necessitates that we look for innovative solutions to bring development forward and this authority has a strong history of doing so. As an obvious example, very close to you is Warblington Farm where we have worked with Natural England and other organisations to put in place an ecological mitigation scheme which was one of the first of its kind in the country and had national recognition. There is more detail about this on our website. This is the kind of scheme whereby we can achieve much needed new development and economic growth whilst ensuring that we embrace the environmental safeguards and protections which are needed to make sure that development is sustainable.

Nonetheless, as you rightly highlight, the Building a Better Future Plan is able to meet less than half of the need for new housing whilst meeting the need for commercial development has also been challenging. Boosting the supply of new housing has been the policy of successive Governments and every iteration of the National Planning Policy Framework (NPPF). When the Local Plan is submitted for examination, we would expect that one of the key areas the inspector will examine is whether the Council has sufficiently exhausted every potential source of new homes in order to address the need for housing. This has necessitated looking at constrained sites, controversial sites and whether and how the constraints on sites can be mitigated. Every site has been looked at by our officers on a case-by-case basis and recommendations to our members are never taken lightly.

I appreciate the procedural points which you have raised and have investigated these. I would highlight that as a local authority, we have had a strong level of officer and member collaboration regarding the detail of this plan. As you mention, there is a cross-party Cabinet Liaison Panel. Procedurally this was set up once again for the current municipal year by the Cabinet at their meeting on 3 June 2026, where you can see both the membership and the terms of reference on the agenda for the Cabinet meeting. Nonetheless, I would highlight that this has been in place since the start of the 2024 municipal year and has met 13 times. The Local Plan has also been considered by the Council's Overview and Scrutiny Panel twice. These discussions mean that our members are involved as evidence is being formed and assessments are being made, ensuring that those making decisions are fully involved.

You have referenced the NPPF and the application of the 'tilted balance'. To clarify, the application of the 'five-year supply' is a matter for decision making on planning applications rather than on producing local plans, albeit that housing supply is a key matter for consideration in producing Local Plans as I've already pointed out. You suggest that the Council can use this paragraph as a "cast iron" guarantee to resist development on this site. I would highlight that in our experience of the planning system, there are never cast iron guarantees; planning decisions are invariably a balance of benefits and harm and will often be finely balanced.

You have also critically highlighted the necessity in your view for an Exceptional Circumstances Report which would be required by the NPPF – I am taking that to mean paragraph 190 where the NPPF sets out that *"When considering applications for development within… National Landscapes, permission should be refused for major development other than in exceptional circumstances"*. I would highlight that the Council is not considering a planning application and would clarify for the avoidance of any doubt that at the time of writing, there are no live planning applications on the site. The Local Plan – through its evidence base and statutory assessments – has given great weight to conserving the landscape and scenic beauty of the National Landscape and the test of an allocation. Through the assessment in the Strategic Housing and Economic Land Availability Assessment and the Sustainability Appraisal, there has been high level of analysis of whether the development has the potential to address the three test of Paragraph 190. There is a high need for housing that cannot be met in whole outside of the National Landscape. The precise impact though will only be possible to determine when considering a planning application for the site. I would also draw to your attention the wording in paragraph 189 which sets out that *"The scale and extent of development within all these designated sites should be limited"*. Through this wording, the NPPF is clearly accepting that some development within National Landscapes is likely to be acceptable.

I am comfortable that officers supported a well-reasoned, evidence-based objective recommendation to Full Council for last night's meeting, which involved a thorough debate. I hope that this response demonstrates that we do not take these matters lightly and consider them thoroughly and I would encourage you to remain involved in the local plan process moving forward.

It was good to meet you yesterday evening. In respect of meeting with Planning officers as you then raised, I understand my colleague [redacted] has been in contact with you regarding potential dates, but I have asked him today to follow this up with you to confirm a meeting.

Regards

[redacted]
Strategic Leadership Team
Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

My working pattern: Monday – Friday full time

Havant
BOROUGH COUNCIL
Your privacy matters. Go to www.havant.gov.uk/privacy-policy

Information in this message is confidential and may be privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.

[redacted]
Sent: 24 July 2026 17:58
[redacted]
Subject: Local Plan Meeting - 23 July 2026

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

Dear [redacted]

Thank you for the useful meeting that [redacted] and I attended with you and your colleagues yesterday.

As promised, I attach some notes of our meeting which I would be grateful if you could review in case we have not understood any point. You will see a couple of highlighted points upon which I would appreciate your clarification.

As we only had an hour with you and your colleagues but only because of your understandable time pressures, we were not able to cover all the points we wanted to. As you know, we will be making a submission to the Planning Inspector and wish to do so from as informed position as possible. We would therefore be very grateful if you or one of your colleagues could consider the questions below and let me have a response.

1. What was the actual date that EM08a was first included in the Local Plan?

The Cabinet papers for the Publication Building a Better Future Plan were published on 23rd June 2026 – this was the point where the proposed allocation was first made public.

2. In terms of landscape, what changed between the SHLAA 2021 finding of unsuitability and inclusion of Site EM08a in the Local Plan in May 2026.

As explained during the meeting, in November 2025, further information was provided by the site promoter in respect of landscape and visual impacts. This included a landscape analysis of the site explaining the site's quality and its contribution towards the wider National Landscape. It has been demonstrated that, subject to appropriate mitigation, a development of 85 dwellings could be accommodated on this site satisfactorily, without causing harm to the wider National Landscape area and the qualities which form the basis for its national designation.

As set out during the meeting, the site which has been previously discounted was a larger area (including further parcels to the south, allocation EM08). The site current allocated for development (EM08a) is a much smaller proportion of the previously discounted site. Development on the discounted, southern parcels would not be considered acceptable, in terms of landscape and visuals impacts.

3. We note that paragraph 4.18 of the Sustainability Appraisal records that exception criteria for Policy 30 were considered and not taken forward because it would reduce the policy's effectiveness. Please can you clarify what is meant by this statement, in the context of the words" where allocated in this Local Plan or" in the published Local Plan.

Exception criteria for development are widely used in planning policy, these can include a wide ranging measures to allow a particular type of development in order to meet a specific need in an area where a general development would not otherwise be considered acceptable. An example of such criterion could be a small scale affordable housing development in rural areas to boost economy and vitality of rural communities and to provide housing for local people, while maintaining a restriction for any other generic development. Another example could be the lack of a requirement for a flood risk sequential test for a development located in an area at risk of flooding, where there is a housing allocation in a local plan. The lack of requirement for a sequential test does not mean that development does not have to provide appropriate flooding mitigation in line with the relevant flooding policies and the NPPF. It means that the principle of development in the flood zone has been accepted, and, subject to the provision of an appropriate mitigation, the flooding designation in itself would not be a reason to refuse an application for planning permission.

Turning to the EM08a allocation, in this case, it has been satisfactorily demonstrated by the site promoter that the smaller parcel could accommodate development without causing harm to the landscape. However, proposed development will still be expected to be designed in a way that achieves this. If development proposal does not meet the landscape policy requirements (or any other policy requirement, ie. in terms of ecology, highways, residential amenity, etc.) it will be refused at an application stage.

The earlier version of the draft Local Plan did not include this clause because there was no need for it, since the earlier version of the Plan did not include any allocations within the National Park for the reasons set out in the answer to the question above.

4. Regarding the chosen strategy, Option 2 permits development only where there are no acceptable impacts on national landscape designations. Where is the conclusion recorded that the impact of EM08a is unacceptable?

As explained above, further information submitted by the site promoter, and verified and agreed by the Council's Landscape Officer, demonstrates that, in principle, a development of 85 dwellings on this site could be accommodated within the site without causing unacceptable harm to the National Landscape. The allocation does not mean that any housing development for this number of dwellings will be accepted at an application stage. The proposed development will still be required to meet the relevant planning policy and the NPPF criteria to gain planning permission.

5. The Sustainability Appraisal was published to the Local Plan web pages on the Council's website on 14 July 2026. When was it provided to Members?

Under the scheme of delegation, which sits alongside the Council's Constitution on our website (https://www.havant.gov.uk/our-organisation/constitution), the preparation of evidence base and statutory assessments to support the Local Plan is a matter which is delegated to officers (see 5.8.1 d, h and m)

6. [redacted] letter to me of 16 July 2026 refers to analysis in the Sustainability Appraisal of whether the allocation addresses the three tests of paragraph 190 of the NPPF. Please can you assist us by indicating where in the Sustainability Appraisal that analysis can be found?

The Sustainability Appraisal assessed the allocation against the relevant criteria established through the baselining process. This is included in Appendix C (Full Sustainability Appraisal of topic policies) and Appendix D (Full sustainability appraisal of sites) published on the Council's website alongside the Sustainability Appraisal:

SA Report - Reg 19 BBFP 2026 - Appendix C Topic Policies.xlsx

SA Report - Reg 19 BBFP 2026 - Appendix D Sites.xlsx

The relevance of para. 190 of the NPPF to the site allocation has been discussed in some depth at the meeting. Officers' position remains unchanged in regards to the relevance of para. 190 to the housing allocation. To reiterate, at this stage, it is only possible to assess the potential development against criterion a) (exceptional circumstances, housing need, etc.) and b) (the ability of the Council to identify sufficient land for housing within its own boundary (but outside the National Landscape) and the boundaries of other neighbouring Councils through the duty to cooperate engagement). Criterion c) relates to a detailed design of development on this site and any measures required to mitigate the specific impacts caused by the development. This can only be assessed at an application stage when details of the proposed development are submitted. At this stage, there is no requirement to submit this level of detail. However, in principle, it is accepted that it would be possible to provide an appropriate form of development on this site that would meet the requirement of this criterion, namely the requirement for development to "moderate" its impacts "on the environment, the landscape and recreational opportunities".

7. The Minutes of the Cabinet Liaison Meetings that you said had considered site EM08a on 5 and 18 June 2026.

Whilst we would not usually provide such minutes as part of a Business as Usual request, we note that you have also submitted an information request for them and it is unlikely that an exemption would apply. As such, the 5th June minutes are attached. The Draft Minutes of 17th June meeting are not attached as they have not yet been agreed (this takes place at the next meeting of the panel, and this has not yet taken place). However we can confirm that there is no reference to the Horses Field Site (or its SHELLA or Local Plan reference).

If it is helpful – the membership and Terms of Reference of the panel were confirmed by the Cabinet on 3rd June (item 8). The detail of this is available on our website at https://havant.moderngov.co.uk/ieListDocuments.aspx?CId=128&MId=13484&Ver=4

In conclusion, [redacted] and I would like to thank you and your colleagues for the courtesy and time that you gave us to discuss the Local Plan. It was much appreciated.

Best regards,

John Kingdon
On behalf of the Save the Horsefield - Protect the Chichester Harbour National Landscape

BUILDING
A BETTER FUTURE

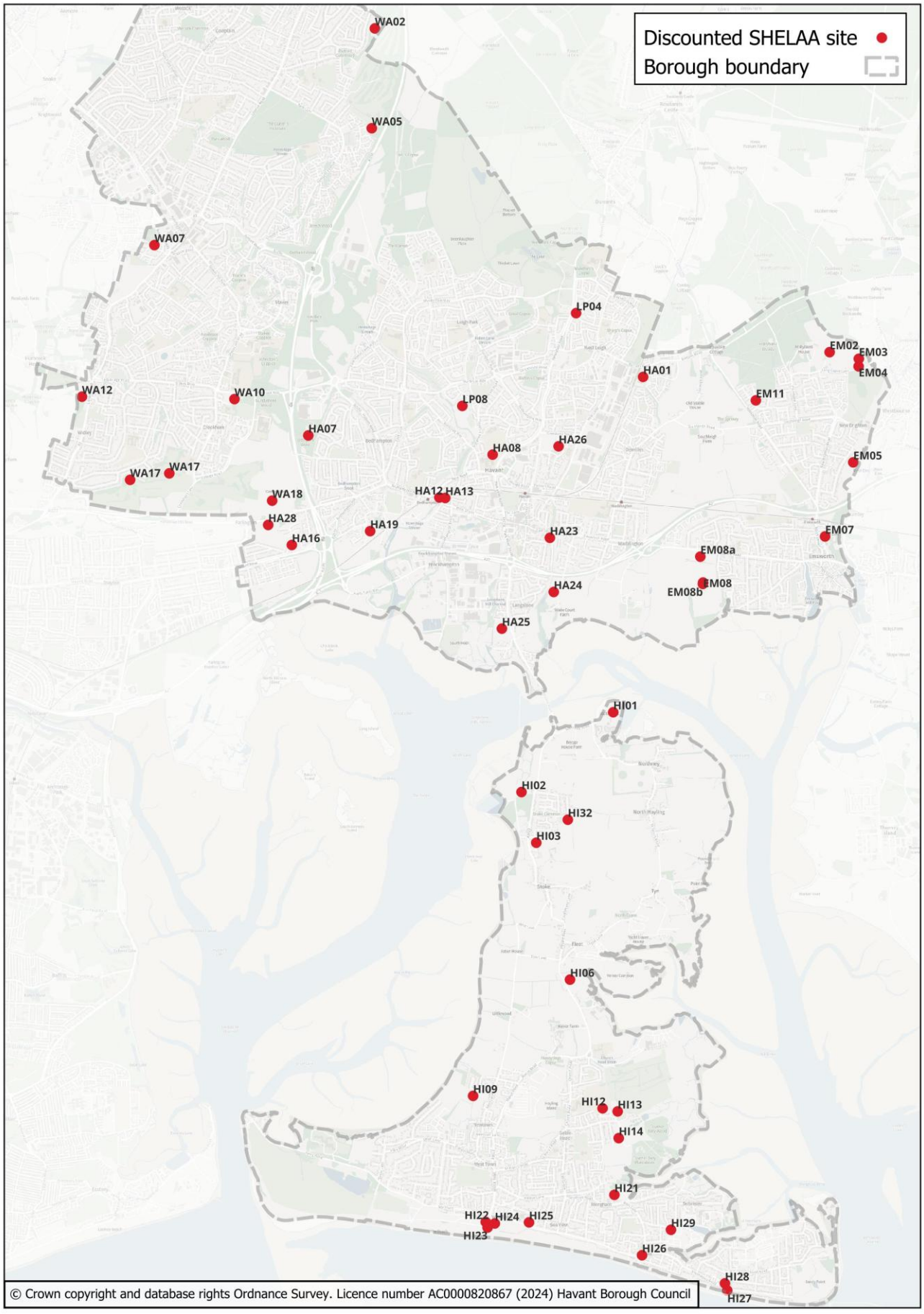
Strategic Housing and Economic Land Availability Assessment (SHELAA)

February 2026



Havant
BOROUGH COUNCIL

Appendix 5 Discounted Housing Sites



The following sites are presented separately given they are duplicates or overlap with other SHELAA sites (either developable or discounted):

Site Reference	Site Name	Site Yield	Reason for discounting
EM02	Land north of Long Copse Lane (Main site)	210	**Not available:** Following withdrawal of outline planning application reference APP/21/00893, two separate site promotions have been received under EM02a and EM02b - the latter of which identifies further fields to the northwest for development.
EM08a	Land west of Havant Road (Horse's Field) - previously known as EM39	85	**Not suitable:** This is a greenfield site adjacent to the urban area but lies within Chichester Harbour National Landscape.
EM08b	Land between the Horses Field and Nore Barn Woods - previously known as EM41	341	**Not suitable:** This is a greenfield site adjacent to the urban area but lies within Chichester Harbour National Landscape. The vast majority of the site is designated as a Site of Importance for Nature Conservation and a Secondary Support Area for Solent Waders and Brent Geese and is identified as being particularly important as used by Curlew. The southernmost field identified as a Candidate site. **Not achievable:** Whilst the site promoter has indicated that land to the south could be used for ecological enhancement, this would not be sufficient to offset the loss of the site in question. On this basis, it has not been demonstrated that suitable replacement compensatory habitat can be achieved.
TOTAL		**636**	

NOTE: Shading denotes an adjustment has been made to the site yield to meet the Council's emerging density standards, but the site promoter has indicated a lower site yield. The revised site yield does not take into account site specific constraints or local character which may justify an alternative approach to the site. It is provided for consistency with the developable sites given the Council is unable to address the scale of its housing need.

* Denotes the existing use on the site would be retained in some form. On these sites, no adjustment to the site capacity has been made to meet the Council's emerging density standards.

Site Reference	Site Name	Site Yield	Reason for discounting
EM03	Land west of Westborne	140	**Not suitable:** This is a greenfield site that is separate from the existing urban area. The northern part of the site is adjacent to ancient woodland, and the site is in close proximity to the South Downs National Park. In landscape terms, development of the site would introduce buildings to open countryside between Emsworth and Westbourne, beyond the current eastern-most extent of urban bult form and land-use on the edge of Emsworth. **Not available:** Although the site was included in a previous SHLAA it is no longer being actively promoted.
EM04	Land at Dairy Farm, Long Copse Lane	28	**Not suitable:** This is a greenfield site that is separate from the existing urban area. In landscape terms development of the site would introduce buildings to open countryside between Emsworth and Westbourne, beyond the current eastern-most extent of urban bult form and land-use on the edge of Emsworth. **Not available:** A previous planning application was withdrawn in 2022, with no recent development activity. The site is not being actively promoted.
EM05	Westwood Close	64	**Not suitable:** The site is designated as the Ems Valley Corridor Local Green Space in the made Emsworth Neighbourhood Plan.
EM07	Gas Site, Palmers Road	25	**Not suitable:** Whilst the majority of the site is not at risk of in the present day, risk is predicted to significantly increase in the future. Current and future risk zones may include functional floodplain.
EM08	South of Havant Road (EM08a and EM08b)	492	**Not suitable:** This is a greenfield site adjacent to the urban area and within Chichester Harbour National Landscape. The site is a Solent Wader and Brent Goose Strategy secondary site and particularly important as used by curlew. **Not achievable**: Whilst the site promoter has indicated that land to the south could be used for ecological enhancement, this would not be sufficient to offset the loss of the site in question. On this basis, it has not been demonstrated that suitable replacement compensatory habitat can be achieved.
EM11	Spencer Road Open Space*	15	**Not suitable:** The site comprises undeveloped land within the urban area. Development would need to comply with the adopted open space planning policy. This has not currently been demonstrated.
HA01	Havant Garden Centre	58	**Not available:** The site was included in a previous version of the SHLAA, but the original site promoter indicated that it is no longer has an interest.
HA07	Littlepark House	120	**Not suitable:** The majority of the site is covered by trees which constitute ancient woodland and are protected by a woodland tree preservation order. There is a small amount of previously developed land within the centre of the site which is separated from the urban area.