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	Mr
First Name	Andrew
Last Name	Caple
[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.

ALLOCATON 3: ALLOCATION OF THE SITE EM08A FOR THE DEVELOPMENT OF 85 HOUSES

I am objecting to the allocation of Allocation 3 (designated as site EM08a) for the development of 85 houses. This site is wholly within the Chichester National Landscape and is locally known as the Horsefield. The decision to allocate this site was made late in the Regulation 19 plan-making stage. It was not included in the Regulation 19 Local Plan that had been previously consulted on.

This site allocation is not legally compliant and is unsound in a number of ways:

INSUFFICIENT ASSESSMENT OF THE SUITABILIBILTY OF THE SITE

Allocation 30 was introduced at a very late stage in the preparation of the Regulation 19 Local Plan. Although the site was added to the Plan in May 2026, its inclusion was not made public until 23 June 2026, when it appeared in Cabinet papers published only one week before the Cabinet meeting that approved the Plan for submission to Full Council.

This timeline raises serious concerns about the adequacy of the assessment process. The SHELAA was amended on 23 June 2026 to identify the site as deliverable, although there has been no underlying re-assessment of the suitability of the site. (The site has been identified as discounted over numerous previous site assessments for reasons including being in the National Landscape, and there has been no material change in these criteria. At the same time, the Sustainability Appraisal continued to identify development of the site as having a negative effect. Despite these concerns, the Council has provided no evidence demonstrating that a sufficiently robust assessment was undertaken to establish either the site's deliverability or its suitability when compared with reasonable alternative sites.

These shortcomings are particularly significant because the site lies within a National Landscape. In such circumstances, the NPPF requires a rigorous and evidence-based assessment of impacts, alternatives, and the justification for development. However, the Council has not demonstrated that Allocation 30 was assessed in accordance with the requirements of NPPF paragraphs 187-189.

Furthermore, the Council has provided no evidence that the allocation satisfies the exceptional circumstances and public interest tests required by NPPF paragraph 190 for major development within a National Landscape. Instead, the site has been allocated and its projected housing delivery included within the Plan's housing supply without first demonstrating that it can meet these fundamental policy requirements.
In effect, the Council has assumed that the site is suitable for development before establishing that it complies with the tests that the NPPF requires. This reverses the proper plan-making process. A site should be allocated because it has been shown to satisfy the relevant policy requirements, not allocated first and assessed later.

Therefore, Allocation 30 is not supported by an adequate evidence base, has not been demonstrated to comply with the requirements of NPPF paragraphs 187-190, and is consequently neither legally compliant nor sound

PROCESS FAILINGS

I have serious concerns about the process by which Allocation 30 was added to, and subsequently approved within, the Local Plan. It is evident that many Havant Borough Councillors were unaware of the late inclusion of site EM08a, having either not been notified of the change nor given a meaningful opportunity to comment during the plan-making process.

These concerns were significant enough that, at the Full Council meeting on 15 July, a motion was tabled to return the Local Plan to Cabinet and remove Allocation 30 from the Regulation 19 Plan. A sufficient number of Councillors were so persuaded by the arguments that 50% supported the motion and was defeated only by the Mayor's second casting vote.

I contend that the motion would have succeeded had the Lead Councillor for the Local Plan not strongly asserted that there was insufficient time to amend the Plan before submission for examination and that officers would not make the changes even if the Plan were referred back to Cabinet. It was additionally stated that the Full Council meeting was not the time to make such amendments but was for the Local Plan Examination stage to decide the legality of the Plan. At no point did a Council Solicitor intervene to correct any statements made.

It is misleading to suggest that officers would disregard a lawful instruction from Full Council. Furthermore, if there was genuinely no time available to consider amendments following the Full Council meeting, this raises serious questions about the purpose of that meeting and suggests that members were effectively being asked to rubber-stamp a predetermined outcome.

Such a position could only be justified if councillors had been given a proper opportunity to review and

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Therefore, the decision-making process was flawed, and the inclusion of Allocation 30 renders this aspect of the Plan unsound.

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.

To remove Allocation 3 from the Regulation 19 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 1 0 files to include with your form.

- File: Allocation 3 - Objections - Andrew Caple - 9Sep26.docx - 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.

In order to respond to the Council’s evidence and to assist the Inspector on matters of local knowledge and the chronology of this allocation.

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

Havant Borough Council Regulation 19 Local Plan Consultation Response

Submitted by:

Andrew Caple
[redacted]

[redacted]

Allocation 3: Allocation of site EM08a for the development of 85 houses

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Insufficient Assessment of the Suitability of the site

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major development within a National Landscape. Instead, the site has been allocated and its projected housing delivery included within the Plan's housing supply without first demonstrating that it can meet these fundamental policy requirements.

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Such a position could only be justified if councillors had been given a proper opportunity to review and scrutinise the late inclusion of Allocation 30 before the meeting. They were not. As a result, the decision to retain Allocation 30 in the

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