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	Graham
Last Name	Carter

[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:
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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	2
Paragraph Number	-
Page Number	95-97

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.

No Response

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.

Regulation 19 representation — Allocation 2: Land north of Long Copse Lane

I am objecting to Allocation 2 — Land north of Long Copse Lane and consider that this allocation should be removed from the plan.

My objection is not simply that I do not want development on this site. My concern is that, based on the Council's own evidence, I do not believe the allocation has demonstrated that it is sound, particularly in terms of being justified and effective.

There are three issues that particularly concern me.

1. The plan relies on improvements that it does not actually require

The Council's own evidence indicates that the site needs proper walking, cycling and bus connections to Emsworth for the development to be acceptable.

However, the policy appears only to require the developer to "explore opportunities" for these improvements.

That seems a significant weakness. Exploring an opportunity is not the same as delivering it. A developer could explore the possibility of providing a walking, cycling or bus connection, decide that it is not practical or viable, and still have complied with the policy.

I therefore do not understand how the plan can be considered effective if important infrastructure needed to make the development sustainable is not actually secured through the allocation.

In my view, the plan is therefore not sound because it is not effective or sufficiently justified.

2. The landscape impact has not been properly accounted for

The site is immediately below the South Downs National Park. This is not simply another housing site with an ordinary landscape setting.

The Council's own landscape appraisal gives this site one of the poorest landscape assessments of the sites being considered for allocation. More importantly, a 2015 landscape study commissioned by the Council assessed this land as having the lowest possible capacity to absorb development and recommended that none of the site should be developed.

I am concerned that this earlier evidence does not appear to have been properly reflected in the current evidence base.

If the Council previously commissioned evidence which concluded that this landscape had very limited capacity for development, I believe there needs to be a clear and convincing explanation of what has changed and why that evidence can now be disregarded.

Without that explanation, I do not believe the allocation is based on a sufficiently robust assessment of the landscape consequences.

I therefore consider the plan not sound because the allocation is not adequately justified.

3. There are serious questions about whether the sewage network can cope

The proposed development would drain to Thornham treatment works.

The evidence prepared for the councils identifies limited spare capacity at the treatment works and describes the system as already being environmentally constrained.

I understand that funding has been confirmed to increase capacity for housing in Chichester, but that equivalent funding has not been confirmed for the Havant sites in Emsworth.

That raises a basic question: how can the plan be considered effective if the necessary sewage infrastructure is not demonstrably available to support the development?

This is particularly important because Allocation 2 is a substantial development and could use a significant proportion of the remaining headroom at the treatment works.

I do not think it is sufficient to assume that the infrastructure problem will somehow be resolved later. The

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plan needs to demonstrate that the development it is allocating can actually be supported by the necessary infrastructure.

In my view, this means the allocation is not sound because it is not effective and is not consistent with national planning policy.

Overall conclusion

Taken together, these issues leave me unconvinced that Allocation 2 has been properly justified or that it can be delivered in the sustainable way the plan assumes.

My objection is therefore not simply about the principle of building houses in this location. It is about whether the evidence actually supports allocating this particular site for development.

I consider that it does not.

I therefore consider Allocation 2 — Land north of Long Copse Lane — to be unsound and ask that it be removed from the 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 f orm will be used by the Council to notify you of these milestones.

Yes, I wish to be notified