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	Richard
Last Name	Taylor

[redacted]

Please provide the following details where applicable and/or relevant

[redacted]

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 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 - 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.

[redacted] I am making a representation concerning Allocation 2 – Land north of Long Copse Lane in the proposed plan. I consider this allocation to be unsound and not legally compliant and I object to the inclusion of this site in the plan. My first concern is that the development appears to rely on infrastructure improvements which have not actually been secured.

The Council's own evidence recognises that suitable walking, cycling and public transport links to Emsworth are important if this development is to be sustainable. However, the wording of the allocation only requires the developer to "explore opportunities" for these improvements. I do not consider this strong enough. A developer can explore an opportunity without actually providing it. If these transport improvements are necessary for the site to be acceptable, they should be firm requirements rather than something that may or may not happen. Without them, a development of this size would place greater reliance on cars and add to pressure on the existing road network.

I am also concerned about whether the sewage system can cope with the additional homes. The development would rely on Thornham Wastewater Treatment Works, which is already described as environmentally constrained. My understanding is that funding has been identified to provide additional capacity associated with development in Chichester, but there is no equivalent secured solution for the Havant allocations in Emsworth. I do not think it is reasonable to allocate a substantial housing site when it has not been demonstrated that the necessary wastewater capacity will be available.

I am particularly concerned about the ecological impact of developing this site. The Council's own evidence records Bechstein's bats as being present on or around the site. These are a rare and protected species. Yet the allocation appears to refer to them only as being "potentially" present, and there does not appear to be a proper site-specific assessment of the bats within the ecological evidence for the allocation.

Given the known presence of a protected species, I do not believe this issue should be treated as a possibility to be investigated at a later stage. The impact on the bats and their habitat should be properly understood before the land is allocated for development. It is difficult to see how the allocation can be considered properly justified when the Council's own evidence identifies the presence of such an important protected species but the allocation does not properly reflect that evidence.

I am also concerned about the landscape impact of developing this site. It lies immediately below the South Downs National Park and is therefore in a particularly sensitive landscape setting. The Council's own assessment identifies significant landscape concerns. In addition, an earlier landscape capacity study commissioned by the Council concluded that this land had very limited capacity for development and recommended that it should not be taken forward for growth. I believe this evidence remains highly relevant when considering whether this is an appropriate location for a substantial housing development.

Taken together, I do not believe that the case for allocating this site has been sufficiently demonstrated. There are significant questions about transport and wastewater infrastructure, the impact on protected wildlife has not been properly addressed, and the landscape impact of building immediately below the South Downs National Park is a serious concern.

And given this history, I question whether it is realistic for the Council to rely on this site to meet its housing requirements. Even the Council's own assessment describes the site as "developable" rather than "deliverable". In my view, this raises a significant question about whether the allocation can realistically be achieved within the timescale of the plan and therefore whether the plan is genuinely effective.

For these reasons, I consider Allocation 2 to be unsound and not legally compliant.

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.

No Response

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

No, I do not wish to be notified