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	Colin
Last Name	Hayter

[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	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.

I believe that the current Havant Borough Council Local Plan containing the above reference location is both unsound (detailed in sections 1-2) and illegal and unsound (detailed in section 3).

2. Sustainability of Allocation 2.

My objection to Allocation 2 is on the basis of sustainability and therefore the plan should not be viewed as effective. Today there are insufficient sustainable transport facilities in this area to provide adequate access to Emsworth, local schools or Emsworth Town Centre/Station. The distance to Emsworth railway station or town centre is at least a twenty-five-minute walk or a ten-minute cycle. The bus service is greatly lacking, with a handful of buses each weekday at times inadequate to supporting effective commuting. These facts are such that anyone wishing to travel from or to Allocation 2 will be encouraged to resort to motorised transport such as a private car, taxi or motorbike. This will not only put pressure on surrounding roads but also the limited parking available across the area. The council's own Sustainability Appraisal recognises that without adequate improvements to a sustainable infrastructure, this site is not deliverable. The wording around the allocation, however, only requires any developer to 'explore opportunities' for provision of enhanced facilities, without any other commitment, thus not ensuring that any required improvements are ever delivered. On this basis, I am of the opinion that this allocation can never be viewed as sound unless adequate improvements to transport links and infrastructure are committed.

Pollution of Chichester Harbour and treatment of Waste Water.

I also object to Allocation 2 with regard to inadequate demonstration that Waste Water capacity is sufficient to support this Allocation. Chichester's (West Sussex) adopted plan has been supported by the commitment to fund the expansion of Thornham Treatment Works. However, whilst any development on Allocation 2 would also flow to Thornham, it is apparent that funding to support such has not been considered, and Havant Council accepts that they have no control to influence its inclusion. This is another example of why this Allocation is not effective. Housing is being allocated without any demonstration as to how resultant sewage generated by such dwellings will be treatable within the plan period. In addition, the levels of nitrogen and phosphorus in Chichester Harbour are already reaching their limits, and a development such as being proposed in this allocation would, even if directed to Thornham Treatment Works, greatly increase this burden on the harbour's waters. Developments are expected to demonstrate that they do not increase the burden on the harbour, and so the Council has tried to mitigate this through offset initiatives, but the certainty and effectiveness of such initiatives have so far seemingly been elusive. I therefore object to this allocation on the basis of nutrient neutrality also.

3. Rare Bats

I object to Allocation 2 because of its impacts on the ecology of this area, particularly its potential impact on the roosting and hunting grounds of the rare and protected Bechstein's Bat. My objection is that this Allocation contravenes Habitats Regulations (a legal issue) and is also unsound. Havant Borough Council's surveys have provided evidence of the presence of these bats on this site. The Bechstein's Bat being a European protected species and one of the UK's rarest bats. However, the description in the Allocation states that they are 'potentially present' and there is no provision of any assessment to support such a description either way. This description is in itself unsound and unsupported by the Council's own recorded evidence.

It is my opinion that this Allocation should be removed from the Local Plan and that the following points be considered for any future planning application that is brought forward on this site. It should never be assumed that developers will do anything other than the bare minimum to meet constraints on sites and so the Council must be more stringent when placing such constraints on any planning application.

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.

Regarding Sustainability issues then the Council must place more stringent and mandatory requirements for sustainability criteria on any developers so that must not only evaluate but provide actual and implementable solutions. Cycle and walkways ensuring that they join up with existing infrastructure to allow safe transit of walkers and cyclists. Committed bus services and much extended hours.

Re water treatemnt then it goes without saying that Southern Water must be committed to providing improve and expanded facilities and capacity within acceptable timeframes.

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.

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 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.

[redacted] greatly impacted by development that may take place.

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