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	Ms
First Name	Helen
Last Name	Murch

[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.

The allocation of the Horse's Field is considered unsound for the following reasons:
1. The site provides a visual gap between Emsworth and Havant urban areas and contributes strongly to the rural open character that lies between the A259 and the coastal margin. Despite the presence of vegetation along the site's northern boundary, there are strong views southwards across the site and the intervening SNCI to the mature vegetation that lies on the coastal edge. The site is thus an important component of the open natural landscapes in the area which are considered to be of National Importance. Development of the site would result in the loss of natural character, openness and important views.

2. Development of the site would be an incongruous urban finger of development projecting into open countryside and the National Landscape.

3. The Council has a statutory duty to conserve and enhance the natural beauty of National Landscapes. Para 4.293 of the Reg 19 Plan states that great weight should be given to conserving and enhancing landscapes and scenic beauty in National Landscape which has the highest status of protection. Para 4.296 states that the plan will seek to protect, conserve and enhance protected landscapes through criteria based policies and through development allocation selections. Development within these protected landscapes will be avoided unless such development would meet the specific criteria in the NPPF associated with protected landscapes. The NPPF of least environmental value local plans to steer the location of development, including through site allocations, in ways which utilise land of least environmental value. This includes the scale and extent of development in protected landscapes. The SHELAA states that the limited availability of land in the Borough means that aside from when development causes unacceptable impact on landscapes of national significance it is not likely to be an absolute constraint. However, the site yield can be affected due to the need to minimise impact on the wider landscape. The SHELAA indicates c. 85 units on the site at a density of 40 dph. It is not possible from the extensive evidence base to unpick the site selection methodology that identified this sensitive site located in a national landscape as being suitable for allocation. Its allocation is not rigorously justified, nor is the 40 dph and 90 unit yield on a site that is within a protected National Landscape.
4. The Sustainability Appraisal identifies the potential impact of the development on the national landscape and the resulting significant negative change in character locally. The SA identifies that it is not possible to mitigate for the loss of openness when development takes place but identifies the potential to mitigate character harm through layout, building heights, separation distances, landscape buffers and screening. The allocation policy was expected to highlight particular vulnerable features and require mitigation. Leaving aside the principle of allocating this site, it is considered that the development requirements for Allocation 3 fail to provide adequate mitigation in the form of requirements relating to density, protection of views through the site, building heights, levels of green space, layout and separation distances. As a minimum, it would have been expected that the Plan would have provided a strategic masterplan for this site setting out the key features and layout that would be needed to help guide developers, Council officers and Members considering a planning application for this incredibly sensitive site. It would also have been expected that a much lower density than 40 dph would have been used to ensure that the important characteristics of the site could be protected and enhanced.

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.

1. Delete allocation 3 from the Plan.

If this is not considered acceptable. The following modifications are requested:
2. Provision of a strategic masterplan in the allocation, (or site development brief) setting out layout, key features to be retained, views to be protected open space to be provided etc
3. Significantly reduce the site yield and use a much lower density on the site to provide a greater sense of openness, enable protected features to be given adequate room and reduce the impacts of overheating.
4. Provide greater direction in the Development Requirements section relating to density, views towards the harbour and open space provision.

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.

To assist the Inspector in understanding the concerns and finding solutions to the issues that Allocation 3 presents.

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.

Yes, I wish to be notified