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	Dr
First Name	Rem
Last Name	Lee

[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	Building a Better Future
Allocation Number	SHELAA Reference: EM08a
Paragraph Number	-
Page Number	98

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 am writing not just as a resident, but as someone who knows this landscape intimately. [redacted] That transition—from the edge of Havant into the quiet, breathing green gap that announces Emsworth—is not a detail on a map to me. It is the very spirit of this place. To lose that would be to lose a part of Emsworth's soul.

My first and deepest concern is the precedent this allocation sets. We are talking about building on land within a National Landscape—a designation that exists precisely to protect places like this from piecemeal erosion. The Council admits the national test applies: major development here should be refused unless exceptional circumstances exist and it is clearly in the public interest. Yet they have produced no independent, site-specific assessment to prove either. No exceptional circumstances have been named. No public interest has been stated. And then, almost as if to brush that problem aside, Policy 30 adds a line—*"other than where allocated within this local plan"*—that appears designed to make the test vanish entirely for the sites they have chosen.

I find that deeply troubling. If we allow this to pass, we are not just approving one development. We are carving out a loophole that could be used again and again. We are telling future developers that the protections of our National Landscape can be sidestepped with a few well-placed words in a policy. That is a risk I believe we cannot afford to take.

I also cannot accept the Council's claim that the "development requirements" attached to this site can adequately ameliorate the environmental harm. I have read the proposed mitigations, and I simply do not believe they are enough. This land is prone to flooding. It sits within a sensitive coastal setting, close to European-designated habitats. No amount of landscaping, boundary planting, or sustainable drainage can recreate the open, undeveloped transition that currently exists between Havant and Emsworth. You cannot mitigate away the loss of a green gap; you cannot engineer back the character that has been centuries in the making. The mitigation feels like a sticking plaster on a wound that runs much deeper.

And then there is the way this site was added—almost as an afterthought, in the final weeks of the plan process, avoiding the years of scrutiny applied to other sites. It only passed Full Council on a casting vote, after a debate that focused more on Government deadlines than on whether this land is actually suitable for development. That does not feel like proper planning to me. It feels like a rush to meet a target, with the landscape paying the price.

We have brownfield sites that could be prioritised. We should be sparing our greenfield land, especially land as precious as this, and making better, smarter use of what we already have. Instead, we are taking the easy path—and in doing so, we are risking the very character that makes Emsworth special.

I am not opposed to development in principle. But I am opposed to development that ignores its own rules, that sidesteps national protections, and that asks us to believe that a few conditions can undo the loss of something irreplaceable. The Horsefield is not just another site. It is the gateway to our town, the lungs of our landscape, and the green pause between two communities. Once it is gone, it is gone forever. And I fear that the precedent we set here will echo far beyond this one field.

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.

I have thought long and hard about what it would take to make this Plan legally compliant and sound. And I keep coming back to the same conclusion: the only modification that can truly address the fundamental flaws I have identified is the removal of the Horsefield site—allocation EM08a—from the Building a Better Future Plan.

I do not say this lightly. I know the Council needs to meet housing targets, and I understand the pressures they are under. But I cannot see any lesser change that would cure the deep defects in this allocation. No amount of rewording, no additional condition, no promise of future mitigation can repair the fact that this site was never properly justified, never properly assessed, and never properly scrutinised. The problem is not the wording of the policy—it is the site itself.

Here is why removal is the only modification that will make the Plan sound:

It would restore compliance with national policy. By removing EM08a, the Council would no longer need to rely on the questionable wording in Policy 30 that attempts to sidestep the "exceptional circumstances" test for development in a National Landscape. The Plan would once again align with the NPPF, because it would not be allocating a site that fails to meet the statutory test.

It would restore justification to the Plan. Without EM08a, the Council would not have to defend the indefensible—namely, the absence of any independent, site-specific assessment demonstrating exceptional circumstances and public interest. The Plan would be founded on evidence, not expediency.

It would restore confidence in the process. Removing a site that was added in the final weeks, that avoided years of scrutiny, and that only passed on a casting vote would send a clear signal that proper process matters. It would show that the Plan has been positively prepared and is effective, rather than rushed and vulnerable to challenge.

It would protect our National Landscape for future generations. This is the heart of it for me. By removing EM08a, we would be saying that our most precious landscapes are not bargaining chips to be traded away for short-term housing numbers. We would be upholding the principle that exceptional circumstances really do mean exceptional—and that we will not set a precedent that weakens those protections piece by piece.

I am aware that removing a site has implications for the Council's housing land supply. But soundness cannot be sacrificed for convenience. A Plan that relies on an unsound allocation is not a sound Plan at all. It would be far better for the Council to go back, review its evidence, and identify sites that can genuinely meet the tests—rather than force through a site that cannot, and hope no one notices.

My Suggested Revised Wording

If I may be precise, I propose the following modification:

Delete allocation EM08a (land at The Horsefield, Emsworth) in its entirety from the Policy Map and from any associated site-specific policies or schedules within the Building a Better Future Local Plan.

And, flowing from that, I propose that the final sentence of Policy 30 be amended to remove the reference that appears designed to circumvent national policy. Specifically, I suggest:

Delete the words "other than where allocated within this local plan" from Policy 30, so that the policy no longer purports to waive the NPPF's exceptional circumstances and public interest tests for sites allocated in the Plan.

If the Horsefield site is removed, that phrase would no longer be needed in any case—but I believe its removal is important in its own right, to ensure that no future allocation can rely on the same flawed logic.

Inspector, I am not asking for the Plan to fail. I am asking for it to be done properly. I am asking for a Plan that we can all have confidence in—one that respects our National Landscape, follows its own rules, and does not cut corners at the expense of the places we love. Removing the Horsefield site is the only modification that achieves that. I urge you to recommend it.

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.

Yes, I wish to be notified