# 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** | Mrs |
| **First Name** | Carol |
| **Last Name** | Smith |

[redacted]

Please provide the following details where applicable and/or relevant

| | |
|---|---|
| **Job Title** | Parish Clerk |
| **Organisation** | Chidham and Hambrook Parish Council |

## 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** | Policy 30 |
| **Allocation Number** | 3 |
| **Paragraph Number** | - |
| **Page Number** | Page 93 and 253 |

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.

Allocation 3 – EM08a: Objection on Legal Compliance and Soundness
Chidham & Hambrook Parish Council objects to the inclusion of Allocation 3 (EM08a – The Horsefield) in the Local Plan on the grounds that the allocation is unsound and not legally compliant.
1. Allocation 3 – EM08a: Unsound and Not Legally Compliant
The Parish Council understands that the inclusion of EM08a was not subject to public consultation prior to its publication. This appears inconsistent with the Council's Statement of Community Involvement, which establishes the Council's approach to involving communities and other interested parties in the preparation of planning policy.
The Chichester Harbour Conservancy, which has responsibility for the management of the Chichester Harbour National Landscape, was notified of the proposed inclusion of Allocation 3 on 15 June 2026. The Parish Council is concerned that this amounted to notification rather than meaningful consultation, particularly given the site's location within the National Landscape and the potential implications of a major housing allocation.
There are also concerns regarding the evidence base relied upon to justify the allocation. The Council appears to have relied, at least in part, upon a site-specific Sustainability Appraisal prepared on behalf of the landowner. This is particularly concerning given that the Council's own previous assessments and professional advice had identified potential harm to the National Landscape which could not readily be mitigated or remedied.
The allocation of a substantial housing development within the National Landscape therefore raises questions as to whether the Council has adequately demonstrated that the proposal satisfies the higher level of protection afforded to the area and the cumulative effect of Allocation 3 when considered alongside other planned development in the locality.
The Parish Council therefore considers that there is insufficient robust and proportionate evidence to demonstrate that the allocation is justified, deliverable and capable of being accommodated without unacceptable impacts upon the environment and local infrastructure.
For these reasons, Allocation 3 is considered unsound, as its inclusion has not been adequately justified by a sufficiently robust, objective and independently supported evidence base.

_____

2. Policy 30 – Legal Compliance
The Parish Council also objects to the wording of Policy 30, specifically the inclusion of the words: “other than where allocated within this local plan”
The purpose of Policy 30 is to provide protection for the Chichester Harbour National Landscape, which benefits from the same statutory planning status as other designated National Landscapes and is subject to the strengthened protection set out in national planning policy.
The Parish Council is concerned that the additional wording has the effect of creating an exception for sites which the Council itself has allocated through the Local Plan.
National planning policy requires major development in a National Landscape to be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. The Parish Council's concern is that the proposed wording of Policy 30 undermines the application of this test by effectively exempting allocated sites from the protection that would otherwise apply.
At the Full Council meeting in July, the Council indicated that the exceptional circumstances test would be considered at the planning application stage. However, the Parish Council considers that this position is inconsistent with the wording now proposed in Policy 30.
Once a site has been allocated within the Local Plan, the proposed wording could be interpreted as removing the exceptional circumstances requirement from the policy altogether for that site. This creates a significant policy conflict and leaves uncertainty as to when and how the national policy test is intended to operate.
Furthermore, no exceptional circumstances have been identified in relation to Allocation 3. The Parish Council understands that the Chichester Harbour Conservancy has confirmed that there is no independent, site-specific assessment demonstrating that exceptional circumstances exist for this allocation.
Nor has a sufficiently compelling public interest justification been identified which would outweigh the significant policy protection afforded to the National Landscape.
The Parish Council therefore considers that Policy 30, as currently drafted, does not provide an effective or sufficiently robust policy framework for protecting the National Landscape and is potentially inconsistent with the National Planning Policy Framework.
This creates a fundamental concern regarding the legal compliance and soundness of the Local Plan.

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.

The Parish Council considers that the following changes are necessary:
1. Remove Allocation 3 (EM08a – The Horsefield) from the Local Plan, unless and until the Council can demonstrate through robust, objective and independently prepared evidence that its inclusion is justified and consistent with national planning policy.
2. Delete the words “other than where allocated within this local plan” from Policy 30.
3. Ensure that the exceptional circumstances and public interest tests required by national planning policy apply to all major development within the Chichester Harbour National Landscape, including sites which have been allocated through the Local Plan.
4. Ensure that any claim of exceptional circumstances is supported by a robust, independent and site-specific assessment, rather than relying principally upon evidence prepared on behalf of the landowner.
The Parish Council considers that, without these changes, the Local Plan has not demonstrated that Allocation 3 is justified, effective and consistent with national planning policy, and that Policy 30 does not provide an adequate policy framework for safeguarding the Chichester Harbour National Landscape.

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