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	Heather
Last Name	Baker



Please provide the following details where applicable and/or relevant

Job Title	Chairman
Organisation	Chichester Harbour Friends

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	3
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 or 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.

This allocation fails the legal and policy tests required for major development in a protected landscape. The site is entirely inside the Amenity area of the Natural Landscape of Chichester Harbour. NPPF states the great weight should be given to conserving and enhancing the landscape, wildlife and cultural heritage of Protected Landscapes. It explicitly states that Major Development should be refused except in exceptional circumstances and where it can be demonstrated that it is the public interest.
These tests apply at allocation stage and have not been properly applied
This allocation also conflicts with Chichester Harbour Management Plan 2024-5 policies 1,2,3,6,8

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 allocation must be removed from the final plan

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 1 0 files to include with your form.

- File: Object to allocation of Horsefield final.docx - Download

Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consi der 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 exa mination hearing session(s), you may be asked at a later point to confirm your request to p articipate.
No details on the examination hearing session(s) have yet been determined and will be ma de available upon the submission of the Building a Better Future Plan to the Planning Inspe ctorate.

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 out line why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear th ose who have indicated that they wish to participate in examination hearing session(s). Yo u may be asked to confirm your wish to participate when the Inspector has identified the m atters 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

To: Planning Policy Team, Havant Borough Council

Response to: Regulation 19 Pre-Submission Local Plan ("Building a Better Future")
Regarding: Allocation 3 The Horse's Field, Emsworth

Chichester Harbour Friends strongly object to the allocation of this site for residential development .
The plan is **Unlawful** as it is **not consistent with National Policy** regarding development within Protected Landscapes. This policy applies to site allocations as well as at application determination stage

1. Breach of National Planning Policy Framework (NPPF)
The site lies entirely within the Amenity area of **Chichester Harbour National Landscape.** National policy states that great weight should be given to conserving and enhancing the landscape, wildlife, and cultural heritage of these areas. Furthermore, national policy explicitly dictates that planning permission for **major development** within these designated areas should be **refused** except in exceptional circumstances and where it can be demonstrated it is in the public interest. Government guidance says this test applies when allocating sites as well as at application determination.
s245 of LURA requires relevant authorities to **seek to further** the statutory purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of Protected Landscapes. An allocation such as this site such as this cannot possibly comply with conserving and enhancing the natural beauty wildlife and cultural heritage of the Natural Landscape.
Havant Borough Council has failed to demonstrate any exceptional circumstances or unique local public interest that would justify overriding the statutory protection of this landscape..

2. Conflict with the Chichester Harbour Management Plan 2024-2025 and 2025–2030
While Havant Borough Council has still not formally ratified the **Chichester Harbour National Landscape Management Plan 2025–2030**, this document represents the definitive, up-to-date evidence base for the conservation of the area and carries significant material weight. The proposed allocation directly conflicts with the core objectives of both of these plans. In particular policies 1, 2, 3, 6, 8 of the 20254/5 plan
The 2024-5 Management Plan specifically requires that the special qualities of the Nalional Landscape should be conserved and enhanced:

- **Landscape Integrity:** The development represents a severe intrusion into the open, rural setting of the Harbour, permanently destroying its landscape character and the open transition zone between the urban area of Emsworth and the shoreline.
- **Nature Recovery & Biodiversity Net Gain (BNG):** The 2025–2030 plan sets strict, localized targets for habitat restoration. Inserting a major housing development actively conflicts with the Conservancy's localized nature recovery networks
- **Ecological Protection and Water Quality:** The added infrastructure pressure poses an unacceptable risk to the Harbour's water quality via wastewater discharge violating the Management Plan and Habitat Regulation Assessment and environmental and nature recovery.

3. Policy 30 in the reg 19 HBC Local Plan
This new wording states that major development will not be permitted within Chichester Harbour National Landscape, *other than where allocated within this Local Plan* or where it can be demonstrated that there are exceptional circumstances and the development is in the public interest.
This added wording conflicts with national policy and appears to be facilitating the inclusion of Allocation 3

5. Conclusion
The allocation fails the legal and policy tests required for development in a Protected Landscape. To make the Local Plan **lawful**, this allocation must be **completely removed** from the final plan.

Heather Baker
Chairman Chichester Harbour Friends