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	John
Last Name	Kingdon
[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	Allocation 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.

1. Allocation 3 is within the Chichester Harbour National Landscape. To propose a major development of 85 dwellings in a National Landscape is contrary to the National Planning Policy Framework. Paragraph 189 of the NPPF states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues". A major development of 85 dwellings in the National Landscape cannot be mitigated and would do great harm to the landscape. National Landscapes were designated due, amongst other reasons, for their special qualities and to be conserved for the benefit of the nation. Allocation 3 is completely contrary to the fundamental purposes of the Chichester Harbour National Landscape and if approved would set a local and potentially national precedent allowing major developments in these highly valued protected landscapes. Paragraph 187 of the NPPF states that poloicies should contribute to and enhance the natural and local environment and sets out six criteria against which policies and decisions should accord. Paragrah 188 deals with plan making noting that plans should allocate land with the least environmental amenity value, where consistent with other policies in this Framework...and plan for the enhancement of natural capital. Allocation 3 is both inconsistent and non-compliant with both paragraphs 187 and 188 of the NPPF. Planning Practice Guidance confirms that the NPPF applies when allocating sites. No objective independant landscape assessment has been published by the Council, who have instead relied amost solely on the developers submission in deciding to include Allocation 3.
2. The Council's own evidence contradicts the allocation. The Council's SHLAA 2021 discounted the site because it" is within the Chichester Harbour Area of Outstanding Natural Beauty and development of this site would have an adverse impact on the landscape". The site was discounted repeatedly by the Council as successive SHELAA documents concluded that development on the site would cause harm to the National Landscape. This changed following the developer's submission early 2026 which the Council has almost totally relied on without any objective landscape or visual assessment. Bypassing their own evidence base and suitability assessments conducted over many years simply to introduce Allocation 3 invalidates the justification for the allocation and is unsound. Such an approach is not landscape led and does not comply with national planning policy.
3. Allocation 30 relies on the flawed and unsound Policy 30. The wording of Policy 30 is non compliant with the NPPF and implies that the NPPFs exceptional circumstances test does not apply to sites allocated in the Local Plan. As Policy 30 is non-compliant with the NPPF and unsound it cannot be used to enable the allocation of Allocation 3 for major development.
4. Inability to mitigate impacts to the Chichester Harbour National Landscape. Major development on Allocation 3 will cause disturbance and harm to land to the south and west of the site, which are important for protected bird species and are SINCs with adjacent SPAs and SACs, which the Council's own evidence base gives no basis for concluding can be adequately mitigated or comensated. The Council's Sustainability Appraisal scores the site Negative on the Sense of Place objective and concedes that it is not possible to mitigate for the loss of openness.
5. Ineffective Housing Delivery and Constraints. Allocation 3 does not deliver any housing in the first five years and not the proposed 85 dwellings until 11 plus years due ti it being a highly constrained site.
6. Constraints arising from Waste Water. There is no adeaquate Southern Water assessment of the capacity of the local treatment works and the only assessment that does exist is less than certain as to capacity in the system.

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.

Removal of Allocation 3 from the Local 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.

No Response

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.

To adress the evidence put forward by the Council and to assist the Inspector with local knowledge.

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