Chichester Harbour Trust

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Chichester Harbour Trust is a company limited by guarantee registered in England No. 04553653

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Registered Charity No. 1096308

The Leader, Councillor Gillian Harris MBE

Havant Borough Council

By email

14th September

Dear Gillian

***BUILDING A BETTER FUTURE PLAN PUBLIC CONSULTATION ;* Allocation 3 and Policy 30 Nationally Protected Landscapes.**

The Chichester Harbour Trust is an independent charity committed to the conservation of Chichester Harbour National Landscape for the future, working closely with our partners at Chichester Harbour Conservancy and with the wider harbour community and stakeholders.

We emphasise that the National Landscape statutory designation is awarded to those landscapes of the highest quality and of national significance and priority for conservation. These landscapes are afforded the highest level of protection in national policy, particularly to safeguard against unsustainable and damaging development.

The Trust notes with disappointment the late inclusion for major development of land within the Chichester Harbour National Landscape, known as the Horse Field in Emsworth, in the Local Plan, and the subsequent re-wording of Policy 30 to support its inclusion.

The construction of 85-90 dwellings on this greenfield site would constitute the single largest development ever in Chichester Harbour National Landscape since it's designation in 1965.

The Trust strongly supports the consultation response from Chichester Harbour Conservancy and feels that this proposal is likely to be found both unlawful and unsound.

Moreover, the Trust believes the inclusion of the proposal for 85-90 houses at this site to be completely inappropriate and clearly against the wishes of the local community (evidenced by the formation of the Save the Horse Field action group). Due to the late inclusion of the site within the consultation document, discussions did not take place over Allocation 3. Furthermore, the Chichester Harbour National Landscape section of Policy 30 now includes new wording that says, "other than where allocated within this Local Plan."

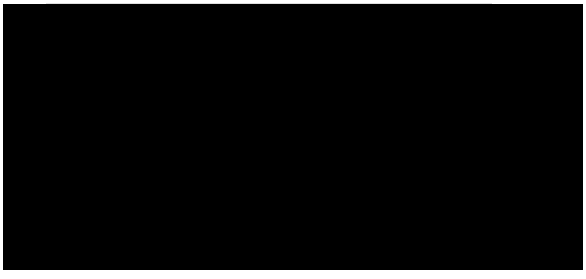
This new wording has clearly arisen in order to facilitate Allocation 3, which could be argued to be disingenuous.

National planning policy sets a strong presumption against major development in National Landscapes, except in exceptional cases. It must be demonstrated that the scheme is explicitly in the public interest before any allocation can be considered. We do not believe that HBC has set out this case clearly, and do not believe there is evidence of exceptional circumstance to justify the site's inclusion in the Plan.

To our minds, the joint re-wording of Policy 30, and the inclusion of Allocation 3 in the Local Plan sets a very worrying precedent, both for Chichester Harbour National Landscape, and for protected landscapes throughout England, by effectively opening the door for major developments in these most protected of areas. As one of the smallest National Landscapes, Chichester Harbour is particularly vulnerable to any level of housing development, and if the government policy protections intended to safeguard them are no longer effective, then the future for these national gems looks very shaky indeed. For the Trust, the policy decisions that are made at this point in time represent an existential crisis for our unique coastal landscape.

The Trust strongly supports Chichester Harbour Conservancy's assertion that by seeking to allocate land for a major development inside the National Landscape, Havant Borough Council are failing in their legal obligation to the Chichester Harbour National Landscape and urge you as Leader, and through Havant Borough Council's Planning Committee, to reject the inclusion of Allocation 3 at the Horse Field and the revised wording of Policy 30 in the Havant Local Plan.

Yours sincerely,



Nick Backhouse, Chairman