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	Mike
Last Name	Bateman

[redacted]

Please provide the following details where applicable and/or relevant

Job Title	Committee member
Organisation	Emsworth Residents Forum

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	2
Paragraph Number	-
Page Number	95

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.

The Emsworth Residents Forum objects to the allocation of Long Copse Lane (325 houses) within the July 2026 Publication Building a Better Future Plan.

The ERF considers that this allocation fails the mandatory tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF). It is fundamentally unjustified, ineffective, and inconsistent with National Policy for the reasons detailed below.

1 Unjustified site selection

The sites on Long Copse Lane have very marked constraints associated with extremely limited accessibility alongside significant environmental and ecological issues. These limitations were recognised by the Council in its assessment of potential sites.

The Strategic Transport Assessment (p63) highlights its very low connectivity – indeed it achieved the lowest score for connectivity. The Sustainability Appraisal (SA Report Appendix D) gives a negative appraisal on transport criteria, including accessibility to shops, services, etc., and on making sustainable modes of transport attractive. Yet it was selected to go forward to take a very large housing allocation.

The evidence is not clear as to why other sites were discounted on grounds which are broadly similar to the constraints present on the Long Copse Lane site but with better accessibility and not within the setting of the National Park. Long Copse Lane has also to be considered as one element in a cumulative growth scenario deeply affecting Emsworth, with two other allocations including Southleigh in very close proximity.

The key question is therefore:

Why was the environmental/heritage harm considered sufficiently serious to discount similar numbers of houses on other sites, whereas the very substantially constrained inaccessible Long Copse Lane site is considered suitable for 325 houses, adding to a potential deleterious impact on the existing settlement of Emsworth - already threatened by the closely adjacent Southleigh proposed allocation?

2 Undeliverable Modal Shift (Unsound: Not Effective)

The Council's justification rests on mitigating the acknowledged narrow, unlit, and sub-standard nature of Long Copse Lane through walking, cycling, and public transport enhancements.

However, the baseline physical constraints of Long Copse Lane—bounded by fixed historic property boundaries and critical drainage ditches—render the construction of a continuous, safe, standard-compliant pedestrian and cycle footway impossible.

A significant modal shift away from the private car is required but absolutely no evidence is presented of precedents elsewhere, to give confidence that this can be achieved in such a peripheral comparatively low density semi-rural location, making the allocation ineffective. It is difficult to see how active travel routes in this location can be sufficiently improved to impact significantly on the behavioural choices of the residents in this location.

3 Postponement of Harm Avoidance in Violation of the NPPF (Unsound: Inconsistent with National Policy)

The July 2026 Sustainability Appraisal explicitly flags significant adverse impacts on adjacent Ancient Woodland, protected species (including bat-foraging networks), and the Southleigh Forest SINC. By allocating this site under the assumption that these threats can be managed via future developer-led "woodland buffers" and "sensitive lighting," the Council bypasses the mandatory "Avoidance" stage of the NPPF Paragraph 180 mitigation hierarchy. Deferring fundamental ecological avoidance to the planning application stage is methodologically unsound.

4 Unresolved Wastewater and Drainage Deficits (Unsound: Not Effective)

The site appraisal notes acute existing downstream flooding and capacity failure within the localized network. Making such a large allocation before Southern Water has secured, fully funded, and engineered network-wide wastewater infrastructure upgrades introduces an unmitigated environmental risk to both the wider catchment and to the internationally protected harbour environments to the south,

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.

To make the Building a Better Future Plan sound, the Inspector is requested to remove the Land North of Long Copse Lane allocation entirely from the 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 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.

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 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.

I wish to have the opportunity to expand on the issues which we have outlined. However, I am content to confirm my wish to participate when the matters and issues for examination have been identified

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