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.
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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 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 land south of the A259 in Emsworth (85 houses) within the July 2026 Publication Building a Better Future Plan.

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

1 Part of the Chichester Harbour National Landscape (Unsound: Unjustified)

The Horse Field lies within the Chichester Harbour National Landscape. Para 190 of the NPPF (2024 version) states that permission should be refused for major developments in such locations, other than in exceptional circumstances and where it can be demonstrated to be in the public interest.

Policy 30 attempts to circumvent this restrictive condition stating that major development will not be permitted within the Chichester Harbour National Landscape, other than where allocated in this Local Plan…. This approach seems to be effectively attempting to rewrite the NPPF to apply it at the level of the local plan with no exceptional circumstances cited for that approach.

As part of the Chichester Harbour National Landscape, the Horse Field is adjacent to an area of high ecological value. The Council's assertion that "structural landscaping" can adequately mitigate the threat to this landscape is flawed.

2 Artificial Isolation of Cumulative Environmental and Infrastructural Pressures (Unsound: Unustified)

The evidence base assesses the environmental and infrastructural footprint of the Horse Field in isolation. This approach ignores the cumulative recreational, environmental and transport pressures hitting the Emsworth fringe concurrently from the Southleigh proposed development and the Long Copse Lane allocation further to the north-east. Because the total, combined infrastructural load has not been comprehensively modelled, the allocation is unjustified.

There are particular problems associated with the capacity of the local wastewater network and treatment works, which are acknowledged in the Infrastructure Delivery Plan. Proceeding with this allocation without fixed, binding commitments from Southern Water for infrastructure delivery risks increased emergency storm discharges into the globally protected habitats of the Chichester Harbour National Landscape.

3 Failure to Test Less Harmful Spatial Alternatives (Unsound: Unjustified)

To meet the "Justified" test of soundness, the Council must prove that the Horse Field is selected following the objective exclusion of less harmful options which are not in protected landscapes.. The 2026 evidence base does not demonstrate that brownfield or lower impact greenfield alternatives across the wider borough were fully exhausted before allocating this sensitive fringe location

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.

No Response

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.

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 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