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 an agent completing this form on behalf of a client

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.
No Response

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.

Title	MR
First Name	JOHN
Last Name	MONTGOMERY MRTPI
Job Title	SOLE PRACTICIONER
Organisation	TANNER & TILLEY DEVELOPMENT CONSULTANTS



Please provide the following information about the client for whom you are completing this f orm on their behalf

Title	MR
First Name	ANDREW
Last Name	HUNNIBAL
Organisation (if applicable)	SAVE LONG COPSE LANE ACTION GROUP

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	1
Allocation Number	2
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.

The Localism Act 2011 imposes a duty on local planning authorities to cooperate with each other. Paragraph 26 of the NPPF states that joint working should help determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Whilst it is clear from the draft Plan that there has been much joint working with neighbouring Hampshire Authorities through the Partnership for Urban South Hampshire (PUSH) the findings of the current Transport Assessment and the Strategic Green Wildlife and Biodiversity Corridor indicate that there has been insufficient liaison with Chichester District Council, West Sussex County Council and the South Downs National Park Authority. The lack of joined up thinking with authorities to the east has significant implications particularly for policy formulation in Emsworth. With regard to the Transport Assessment this has implications for proposed developments served directly or indirectly by the A257. Similarly the importance of the Strategic Green Corridor from South Downs National Park to Chichester Harbour is not reflected in the proper assessment of suitable sites. In addition to legal compliance the shortcomings of joint working has implications for the soundness of the plan.

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.

Further discussions should be held with the neighbouring authorities in Sussex and the Plan should be re-evaluated with specific regard to:
1.The impact of development along the A257 corridor.
2.The fragmentation of the Strategic Green Corridor
3.The impact of the allocation of land north of Long Copse Lane (Allocation 2) on the South Downs National Park.

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.

- File: SLCL_Planning_Statement_MODIFICATIONS.pdf - Download

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.

To explain in detail why there a subsequently preferable sites available to meet the Plan's objectively assessed need and ensure that the inspector has a clear understanding of the specific site constraints that apply to the site north of Long Copse Lane

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

PLANNING STATEMENT

in opposition to the allocation of Land north of Long Copse Lane for development

September 2026

Executive summary

The land on the north side of Long Copse Lane ("the Site") is outside the urban area, in open countryside adjoining the South Downs National Park. The Borough Council's adopted planning policies prohibit the development of this sensitive and highly constrained site.

Development of the Site would result in the loss of an important undeveloped gap between Emsworth and Westbourne and would cause harm to the rural character and appearance of the area. The Landscape Sensitivity and Capacity Study prepared for the Council by Kirkham Landscape Planning Ltd in 2015 rated the land parcel of which the Site forms part as of high landscape sensitivity and low capacity, and recommended that no part of it be taken forward for potential growth. Increased traffic on a narrow lane without footways will cause danger to pedestrians and horse riders. Any layout will require the loss of mature and veteran trees of amenity value, and the development will harm internationally protected species. Additional housing will place unacceptable pressure on local infrastructure, with implications for drainage, school provision and local medical practices. The Site is not in a sustainable location.

This submission is made on behalf of the Save Long Copse Lane Action Group ("the Group"), representing 624 local residents.

1. INTRODUCTION

1.1 Havant Borough Council proposes to allocate land on the north side of Long Copse Lane in Emsworth for residential development in the Regulation 19 pre-submission Building a Better Future Plan ("the Plan"). Draft Allocation 2 proposes the Site for development with an indicative net yield of 325 dwellings on 18.9 hectares.

1.2 It should be noted that it is now proposed to increase the allocation by including an additional area of land to the north of that previously identified in the Regulation 18 version of the Plan. The indicative yield has therefore increased from 260 to 325. This adds to the environmental impacts identified in the Plan and set out in more detail below. It also increases pressure on local infrastructure in respect of the highway network, sewerage capacity, medical and education facilities. It also brings the proposed development closer to the South Downs National Park.

1.3 From March 2026 a new system for creating and examining local plans has been introduced, first provided for in the Levelling-up and Regeneration Act 2023. This Plan will nonetheless be examined against the National Planning Policy Framework of December 2024 rather than the current edition. Annex A, paragraph 8 of the August 2026 Framework, at printed page 99, provides that "any other plans should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply". References to "the Framework" below are to the December 2024 edition unless otherwise stated.

1.4 For the Plan to be sound, paragraph 36 of the Framework requires that it is:

- **Positively prepared** — providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities where relevant;
- **Justified** — "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence";
- **Effective** — "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground";
- **Consistent with national policy** — enabling the delivery of sustainable development in accordance with the policies in the Framework.

2.0 BASIS FOR OBJECTION TO DRAFT ALLOCATION 2

2.1 Paragraph 9 of the Framework, at printed page 5, states that planning policies and decisions "should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area". Paragraph 124, at printed page 36, provides that strategic policies "should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land". The land north of Long Copse Lane is not brownfield land, nor is it in a sustainable location. On this basis the Plan is unsound as it is inconsistent with national planning policy.

2.2 The Plan records at paragraph 2.104, printed page 59, that "the most up to date assessment of objectively assessed housing need (based on the local housing need – 2024 standard method) is 15,822 dwellings over the plan period, which equates to 879 homes per annum". Policy 6, on the same page, provides that "during the period 2022-2043, this plan makes provision for at least 7,087 new dwellings across the Borough during the plan period, averaging 337 dwellings per annum". The Council recognises that the constrained nature of the Borough makes it impossible to meet need in full: at paragraph 2.108, printed page 60, it states that "around 40% of the Borough's overall housing need will be met and this will result in a large shortfall of housing delivery over the plan period in the region of 9,500 dwellings".

That approach is supported by paragraph 11(b)(i) of the Framework, at printed page 6, which permits strategic policies to fall short of objectively assessed needs where "the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". Footnote 7 to that paragraph lists the relevant constraints, and they include National Parks, designated heritage assets, habitats sites and irreplaceable habitats — four of the constraints engaged by this Site. It follows that the figure of 7,087 is not set in stone, but has been arrived at by an assessment of the constraints and opportunities of the sites throughout the Borough promoted by landowners. Given the number and significance of the constraints identified below, Allocation 2 should not have been included in the Plan.

2.3 The Site, which has an area of approximately 18.9 hectares, comprises open grazing land surrounded by mature trees and hedgerows. Being in the countryside outside the existing settlement, it has an attractive rural character. It adjoins Southleigh Forest, which extends northwards out from the Borough boundary with a strong relationship to the wider countryside linking to the South Downs.

The Council's landscape evidence is in two parts. The *Havant Borough Townscape, Landscape and Seascape Character Assessment, Volume 1*, February 2007, prepared for the Council and Hampshire County Council by Kirkham Landscape Planning Consultants, describes the character of the Borough's landscapes and sets a landscape strategy of conserving and enhancing local character. Separately, in 2015 the Council commissioned a *Landscape Sensitivity and Capacity Study* from the same consultants. In respect of land

parcel LCA 21.3, of which the Site forms part, that study noted that although the parcel is not within a nationally designated landscape it is within the undeveloped gap separating Westbourne and Emsworth; it rated the parcel as of **high landscape sensitivity** and **low capacity**, the lowest of its five capacity categories; and it recommended, at page 188, that "no part of land parcel LCA21.3 is taken forward for potential growth".

Neither document appears in the published evidence base for this Plan. No landscape sensitivity, capacity or character study forms part of the Regulation 19 evidence base at all.

2.4 The Plan identifies the Site as suitable for 325 dwellings. Its own Key Features list for Allocation 2, at printed page 95, records that the Site is a greenfield site; that "Tree Preservation Order (TPO) woodland bounds part of the northern boundary and extends into the north west of the site. A further area of TPO woodland wraps around the south western corner of the site"; that there is "potential for protected species including (but not limited to) Bechstein's bat"; that there are "adjacent Grade II listed buildings (Hollybank House and the Creamery in the Grounds of Hollybank House)"; that the Site is "within the setting of the South Downs National Park"; that Southleigh Forest Site of Importance for Nature Conservation is adjacent; that there is "mature boundary vegetation screening the site from Long Copse Lane"; and that there is a risk of surface water flooding and a secondary aquifer on site. In particular:

Heritage assets

The Site is adjacent to Holybank House and to The Creamery in the grounds of Holybank House, both listed Grade II — National Heritage List entries 1249577 and 1092125 respectively, both first listed on 15 October 1987. Major development would inevitably cause harm to the setting of those listed buildings. Paragraph 212 of the Framework, printed page 60, requires great weight to be given to their conservation irrespective of whether the harm amounts to substantial harm, total loss or less than substantial harm; paragraph 213, printed page 61, requires clear and convincing justification for any harm arising from development within their setting. Even if the harm were less than substantial, paragraph 215 requires it to be weighed against the public benefits of the proposal. Those public benefits are limited, and are not such as to outweigh the harm, given that the Plan does not seek to meet the Borough's housing need in full in any event and that the sequentially preferable capacity identified below is not exhausted. There is also potential for previously unidentified archaeological deposits, particularly from the later prehistoric and Roman periods.

Ecology

Development has the potential to harm protected species, most notably Bechstein's bat, as well as badgers, dormice, nesting birds and reptiles. Natural England, consulted on the withdrawn outline application for this land (APP/21/00893), advised on 9 January 2023 that "as submitted, the application could have potential significant effects on" a list of designated sites headed by the **Singleton and Cockings Tunnels Special Area of Conservation**, and including Chichester and Langstone Harbours Special Protection Area and Ramsar site, the Solent and Maritime Special Area of Conservation, and Langstone and Chichester Harbours Sites of Special Scientific Interest. It required a Habitats Regulations Assessment before the significance of those effects and the scope for mitigation could be determined, and stated that "without this information, Natural England may need to object to the proposal". The implications for protected species are explained in more detail by Nik Knight, in his capacity as Hampshire County Bat Recorder, in his own representation on this allocation.

Trees

The loss of mature trees will erode the character of nearby ancient woodland, formerly part of the Forest of Bere. The Site has strong links to Southleigh Forest, a Site of Importance for Nature Conservation comprising important remnants of the ancient Forest of Bere landscape. Veteran trees on the Site are clearly vestiges of that ancient woodland. Paragraph 193(c) of the Framework, printed page 56, provides that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". No wholly exceptional reasons arise here: the Plan does not depend on this allocation to meet a need it does not in any event seek to meet in full. It is inevitable that veteran trees, particularly adjacent to Long Copse Lane and on the corner of Long Copse Lane and Hollybank Lane, would be lost in constructing 325 dwellings on the Site.

In refusing planning permission for five houses at 4 Long Copse Lane (LPA ref. APP/24/00987) on 29 May 2025, the Council's fourth reason for refusal stated:

"The loss of a part of the front boundary vegetation, including planting protected with a Tree Preservation Order, would have harmful visual and landscape impact on the established verdant character of the street scene and visual amenities of the local residents and would, therefore, conflict with the Council's Borough Design SPD (2011), Policies CS16 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework."

That refusal was upheld on appeal. In appeal decision 6002048, dated 24 June 2026, the Inspector dismissed the appeal, finding at paragraph 8 that the loss of the trees "would reduce the positive contribution made by the site to the street scene, resulting in harm to the verdant character and appearance of the area", and that replacement planting "would thus fail to mitigate for or justify the removal of the protected trees". At paragraph 5 the Inspector found that "the dense mature vegetation which lines the northern side of Long Copse Lane" — that is, the frontage of this allocation — contributes to "a spacious and verdant character and appearance to the area". The loss of protected trees and boundary vegetation inevitably arising from the development of Allocation 2 would similarly conflict with the Framework, with Development Plan policy and with the Council's supplementary planning document.

Water quality and drainage

The Site overlies a secondary aquifer, as the Plan's own Key Features list records, and the area has known drainage capacity issues. There are significant surface water drainage issues affecting Emsworth, together with a history of flooding caused by run-off and a high water table. The topography is such that there will inevitably be impacts on the existing surface water drainage regime. The River Ems in particular is highly sensitive to change, with consequential serious impacts on surrounding ecologically sensitive areas such as the Southleigh Forest SINC and Chichester Harbour SSSI. Natural England is in particular concerned at the impact of development on the designated sites as a result of the discharge of additional nutrients — nitrogen and phosphates — into the harbour.

Vehicular access

There is no existing satisfactory means of vehicular access to serve the development. Long Copse Lane is narrow and has no footways. The right-angled bend into Hollybank Lane lacks adequate visibility and is of insufficient width. In addition, a well-used bridleway through Hollybank Woods meets the lanes at this point, resulting in inevitable danger to pedestrians, horse riders and road users.

The consequences of making the lane serve this allocation are recorded in the Council's own submissions to the Planning Inspectorate. At paragraph 12 of appeal decision 6002048 the Inspector recorded:

"The land to the north of Long Copse Lane forms part of a masterplan area for residential development and it is understood that, as part of these masterplan proposals, Long Copse Lane will be widened to 5.7m, vegetation removed and a new footway laid, which the Council suggest would likely encourage higher vehicular speeds than those recorded. It is understood that the outline application for the residential development has been withdrawn and there is no certainty these improvement works will be implemented."

Widening the lane to 5.7 metres and removing its boundary vegetation would destroy the very character the same Inspector found, at paragraphs 4 and 5, to make a positive contribution to the area, and would result in the loss of a number of mature trees including ancient oaks. The highway constraints are examined in more detail in the separate submission by Paul Jackson-Cole. Taken together, the highway improvements necessary to make development technically acceptable would have a harmful impact on the character of the area, and the Council's own evidence is that there is no certainty they would be delivered.

The South Downs National Park

Although not within the National Park, the Site is within its setting, and as noted above the enlarged allocation brings it closer to the Park boundary. The Government continues to regard National Park designation as conferring the highest status of protection as far as landscape and natural beauty is concerned. Paragraph 189 of the Framework, printed pages 54 to 55, requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Parks, and provides that "development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". Major development in or adjacent to the boundary of a Park can have a significant impact on the qualities for which it was designated.[^1] Of particular concern is the impact of development on the International Dark Sky Reserve and on the tranquillity of the Park and existing wildlife corridors.

2.5 In addition to the above, the Site is not in a sustainable location. The nearest public transport route is a significant distance away on Southleigh Road, as are the nearest shops, schools and other facilities. A generous walking distance in terms of sustainability would be up to a maximum of 800 metres from origin to destination. That distance is derived from the Institution of Highways & Transportation advice note *Guidelines for Providing for Journeys on Foot* (2000), and is consistent with the definition of "reasonable walking distance" in the glossary at Annex B to the August 2026 Framework, printed page 111, which gives it as "around 800 metres, or around 10 minutes' walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away". It should be noted that hilly topography can make even short walks challenging for some, so these guidelines need interpretation on the ground in relation to any site-specific proposals.

The plan below shows the Site in relation to local facilities, and not one of them is within 800 metres. The nearest shop is 0.7 miles away — approximately 1,130 metres, some 40 per cent beyond the guideline distance. Westbourne Stores, Westbourne Primary School and Westbourne Surgery are each 1.0 mile away; St James' Primary School is 1.3 miles; Emsworth railway station is 1.7 miles; Emsworth Surgery is 2.0 miles; Warblington Secondary School and Emsworth Primary School are 2.3 miles; and Bourne Community College is 3.4 miles. The majority of future residents would therefore rely on the private car for their day-to-day needs.

2.6 Although the Site is referred to in the Local Plan Housing Statement, that statement does not form part of the Development Plan and therefore carries limited weight.

2.7 The Site has been considered before, and rejected. It was proposed for inclusion in the Havant Borough Local Plan (Allocations) Development Plan Document in 2014. In her report to the Council following the examination of that plan — Inspector Sue Turner RIBA MRTPI IHBC BArch MSc, appointed by the Secretary of

State, considering the Allocations: Submission Version of December 2013, following hearings held from 29 April to 1 May 2014, her report being received by the Council on 7 July 2014 and the plan adopted on 23 July 2014 — the Inspector stated:

"Emsworth – Site UE39: Land North of Long Copse Lane

This site was identified in the 2012 SHLAA and was considered suitable for housing subject to highway improvements to provide vehicular access. The landowner contends that the necessary improvements can be secured through a section 278 agreement and satisfactory access provided. In addition it is argued that all the potential adverse effects identified in the 2012 Sustainability Appraisal Addendum (SAA), which included appraisal results for this site, can be overcome.

I note that the SAA incorrectly identifies the site as being within Landscape Character Area (LCA) 23 rather than LCA21. However it is clear that regardless of this inaccuracy the SAA recognises the open character of the site, its contribution to the landscape and its location within an undeveloped gap. Furthermore whilst planning permission has been granted for housing development to the west and east of the site, the environmental, ecological and archaeological issues raised in the SAA support the Council's conclusion that this site is less sustainable than the allocated sites in Emsworth."

The constraints that led an Inspector to that conclusion in 2014 have not been removed. The Plan does not explain what has changed.

Alternative sequentially preferred sites

2.8 Alternative sites, in the form of those identified in the emerging Plan together with sites rejected in the 2026 Strategic Housing and Economic Land Availability Assessment, have been considered in this submission. With a modest increase in density on the sites allocated in the Plan, plus the allocation of a number of sites previously rejected, it can be demonstrated that the Long Copse Lane site is not required in order for the Council to meet its provision and maintain a five-year supply of deliverable housing land as required by the Framework.

2.9 In total, the alternative sites could potentially deliver over 750 additional dwellings.

2.10 The Council's own policy requires more of its allocated sites than its yields assume. Policy 14 of the Plan, at printed page 168, provides that "any residential development must maximise its contribution to addressing housing need", sets minimum densities of 80 dwellings per hectare of net development area in the town centres, 55 in the wider opportunity areas and 40 dwellings per hectare elsewhere in the Borough, and states that "residential developments providing an artificially lowered density will be refused". The Council's *Residential Density Evidence Paper* of August 2025, which underpins that policy, states at paragraph 8.5 that "development that fails to optimise the use of land will be refused planning permission", and illustrates at page 38 a suburban scheme in Emsworth of 125 two-storey family houses achieving 40 dwellings per hectare. The August 2026 Framework is to the same effect: Policy L3, "Achieving appropriate densities", at printed page 57, provides that development proposals within settlements "should contribute to an increase in the density of the area in which they are situated".

The Plan does not demonstrate that the indicative yields on which Table 5 depends were derived at the densities Policy 14 requires. Until it does, the housing capacity of the allocated and previously rejected sites is not established, and neither is the proposition that Allocation 2 is needed to make up the difference. That is not an argument for intensifying this Site: a site carrying Tree Preservation Order woodland on two boundaries, an adjacent Site of Importance for Nature Conservation, Bechstein's bat, two listed buildings,

the setting of the National Park, surface water flood risk and a secondary aquifer is precisely a site on which density cannot be optimised, which is a further reason why the Plan should not rely on it.

2.11 Of particular significance is Southleigh (Allocation 1), which the Plan describes at paragraph 2.105 as "capable of accommodating around 2,100 dwellings" on a site of 146.32 hectares. The Plan is not consistent about how many of those dwellings fall within the plan period. The site profile at printed page 90 records an indicative net yield of "2100 (of which 1,500 in the plan period)". Table 5, the sources of housing supply table at printed page 62, enters "Broad location BL5 Southleigh" at 150 dwellings in Years 1 to 11 and 1,500 in Years 12 to 21 — a total of 1,650 — and it is that higher figure on which the Plan's supply total of 7,394 depends.

2.12 Neither figure is borne out by the application now before the Council. Outline application APP/26/00324, made by Bloor Homes Limited and landowners, was received on 12 May 2026 and is scheduled for decision on 23 September 2026. It is for **1,800 dwellings on 106.55 hectares** — 300 fewer dwellings than the allocation, on some 73 per cent of the allocated area, with the remainder requiring a further application which does not exist. For the Plan's trajectory to hold, 1,650 of those 1,800 dwellings would have to be completed by 2043, from an outline permission not yet granted, on a site whose own supporting text at paragraph 3.14 states that "due to the lead in timescales to plan, obtain consents and build the scheme, it is not expected to be complete before the end of the plan period and so the remaining homes will come forward after 2043". Nor is that application a settled matter: Hampshire County Council, as highway authority, advised the Council on 28 July 2026 that the information submitted is "insufficient to adequately support the assumptions and design parameters underpinning both the proposed site access arrangements and the off-site mitigation measures", and requested "that a holding objection be maintained on the application on the grounds of insufficient information".

The Plan's housing supply is therefore not soundly evidenced, and its treatment of the Borough's largest allocation is not consistent within its own pages.

2.13 The planning application for approximately 210 dwellings on the majority of the Site (APP/21/00893), made by Land & Partners, was submitted on 23 August 2021 and withdrawn on 23 June 2025, without ever being determined, after nearly four years of negotiation. The Council's own trajectory now reflects the difficulty. Appendix 1 to the Plan shows no completions at all from Allocation 2 before 2032/33, and Table 5 enters the allocation at 30 dwellings in Years 1 to 11 and 295 in Years 12 to 21 — 91 per cent of it beyond the first eleven years. The February 2026 Strategic Housing and Economic Land Availability Assessment treats the Site as developable rather than deliverable, records that the yield is not evidenced by site-specific constraint analysis, and states that the detailed work on the ecological and Tree Preservation Order constraints has yet to be undertaken. The Infrastructure Delivery Plan carries no entry for this allocation at all. On the Council's own evidence the Site is not deliverable, and it should not be included in the Plan.

3.0 CONCLUSION

3.1 The Framework maintains a clear preference for the effective use of previously developed land in preference to greenfield sites. That is echoed in the Plan, which reiterates a strategy of maximising the potential of development that can be achieved on brownfield land while recognising that it will be necessary to release greenfield sites to meet the need for development.

3.2 The Long Copse Lane site is not in a sustainable location. The majority of future residents would have to rely on the private car for their day-to-day needs. Development would therefore be contrary to the principles that underpin the Framework.

3.3 As identified above, the land north of Long Copse Lane is a highly constrained greenfield site which contributes to and enhances the natural and local environment, recognising the intrinsic character and beauty of the countryside in accordance with paragraph 187(b) of the Framework, printed page 54.

3.4 Given the capacity that could be delivered on sequentially preferable sites, and the Council's own density policy, there is no justification for Allocation 2.

3.5 The allocation does not accord with the principles set out in the Framework in terms of achieving sustainable development, and is therefore **not consistent with national policy**. It is **not justified**, because it is not an appropriate strategy when considered against the reasonable alternatives and is not based on proportionate evidence. And it is **not effective**, because on the Council's own evidence the Site is not deliverable within the plan period. The Plan is accordingly unsound in this respect.

[^1]: *English National Parks and the Broads: UK Government Vision and Circular 2010.*