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27 August 2026

REPRESENTATION ON THE BUILDING A BETTER FUTURE PLAN

Allocation 1: Southleigh
Paragraphs 3.12–3.17
Pages 89–95

I consider the Building a Better Future Plan to be unsound, principally because the proposed allocation of Southleigh has not been shown to be justified or effective and therefore deliverable over the plan period.

The National Planning Policy Framework states that a sound plan must be justified by proportionate evidence and must be effective, meaning deliverable over the plan period. In its present form, the plan does not meet those tests in relation to Southleigh.

Southleigh is expected to provide approximately 2,100 homes under the Local Plan allocation, of which approximately 1,500 are anticipated within the plan period. It is therefore fundamental to the plan's housing strategy rather than a minor or readily replaceable allocation. However, the transport and other infrastructure necessary to support development on this scale have not been adequately demonstrated, secured or funded.

ABSENCE OF A DIRECT VEHICULAR CONNECTION TO THE A27

The principal concern is the absence of a direct Southleigh–A27 link road for general vehicular traffic. Without this strategic connection, traffic generated by the development would be directed onto the existing local highway network.

The proposed walking, cycling and public-transport bridge identified within Allocation 1 is not a general vehicular connection and would not provide an alternative strategic route for the substantial number of journeys that would continue to be made by car. It therefore does not resolve the underlying issue of insufficient vehicular access to the strategic road network.

The existing network is already constrained by the railway lines, overloaded level crossings and a limited number of east–west routes. Southleigh Road, Bartons Road, New Lane, Horndean Road and the Warblington and Havant junctions cannot reasonably be treated as having unlimited capacity to accommodate further traffic.

For future residents travelling towards Havant, Portsmouth or the A27, Southleigh Road would provide a more direct route to the Warblington Interchange than travelling east through Emsworth and then back towards Warblington. It is therefore entirely foreseeable that a significant amount of development traffic would use Southleigh Road, regardless of the preferred routes assumed within transport modelling or promoted through a travel plan.

Sat-nav systems will also direct drivers towards whichever route appears quickest at the time. The plan cannot rely on an assumption that future residents will consistently use preferred routes where Southleigh Road offers a faster connection to the strategic road network.

A development of this scale requires a strategic transport solution. It should not be allocated on the assumption that existing residential roads can absorb thousands of additional journeys or that the necessary mitigation can be resolved at a later planning-application stage.

IMPACT ON SOUTHLEIGH ROAD

Southleigh Road is a residential road containing a secondary school and sections of narrow pavement. Residents already experience speeding, congestion and difficulties crossing the road, while vehicles regularly slow, stop or turn to access residential driveways. The applicant's transport evidence predicts substantial increases in traffic on sections of Southleigh Road, yet the plan does not convincingly demonstrate how these additional movements could be accommodated without unacceptable consequences for highway safety, pedestrian safety and residential amenity.

The transport information associated with the current Southleigh planning application forecasts increases on sections of Southleigh Road from approximately 8,294 to 11,021 vehicles and from approximately 4,466 to 7,160 vehicles. These represent increases of approximately 33% and 60% respectively.

Increases of this magnitude cannot reasonably be regarded as insignificant. They would materially alter the character and function of Southleigh Road and affect residents entering and leaving their properties, opportunities to cross the road, the safety and confidence of pedestrians and cyclists, noise, disturbance, congestion and collision risk.

Southleigh Road also serves Warblington School, Warblington Station, bus stops and established walking and cycling routes. Parts of the pavement are narrow, particularly where pupils, families and other pedestrians use the road at busy times. A substantial increase in traffic would make the route more hostile to pedestrians and directly conflict with the plan's objective of encouraging walking and cycling.

There is already a speeding problem on Southleigh Road. Adding substantially more vehicles without comprehensive and funded measures to control speeds and provide safe crossing points would place residents and school pupils at greater risk.

Any mitigation must preserve Southleigh Road's residential function. The answer should not be to impose parking restrictions or remove parked vehicles in a way that creates a clearer, faster and more attractive through-route. Measures must reduce the dominance and speed of traffic rather than convert the road into a more efficient route for development-generated vehicles.

SOUTHLEIGH ROAD AS AN ESTABLISHED A27 DIVERSION ROUTE

A further concern is the established role that Southleigh Road already performs as a diversion route when the A27 is closed. This is not a hypothetical or exceptional possibility: National Highways has formally directed A27 traffic along Southleigh Road during overnight closures, bringing a substantial increase in through-traffic, including HGVs, onto what is ordinarily a residential road subject to a 30mph limit.

The effect on residents during these closures is considerable, particularly overnight, when the volume, noise and vibration associated with heavy goods vehicles cause significant disturbance.

There is also a serious road-safety concern. During diversion periods, vehicles are regularly observed travelling at what appear to be excessive speeds through the 30mph limit, yet there appears to be little or no visible speed monitoring or enforcement. This is particularly concerning given the residential character of Southleigh Road, its narrow pavements in places and its use by pedestrians and pupils travelling to and from Warblington School.

The fact that the existing commercial-vehicle weight restriction on Southleigh Road has previously had to be temporarily suspended specifically to accommodate A27 diversion traffic further demonstrates that the road is not ordinarily intended or considered suitable to carry unrestricted volumes of heavy vehicles.

The Local Plan should not therefore assess the capacity or suitability of Southleigh Road solely by reference to normal average daily traffic flows. Its established function as a strategic diversion route means that foreseeable A27 closures can place substantial additional and abnormal demands upon it. These diversion events must form part of any realistic assessment of the resilience of the local highway network.

Adding the permanent traffic generated by major development at Southleigh to this existing burden would reduce the road's ability to cope safely when disruption occurs on the A27. It would also exacerbate the cumulative effects on highway and pedestrian safety, noise, residential amenity and the reliability of the wider network.

The plan must therefore assess the combined effect of development-generated traffic and foreseeable A27 diversion traffic, including realistic overnight and disrupted-network conditions. Unless the evidence demonstrates that Southleigh Road and the surrounding network can safely accommodate both, the Southleigh allocation cannot be considered adequately justified or effective. This uncertainty goes directly to whether the allocation is genuinely deliverable over the plan period.

WARBLINGTON LEVEL CROSSING AND NETWORK RESILIENCE

The Warblington railway level crossing already causes regular delays and queues. When the barriers are closed, traffic builds up on the surrounding roads and drivers seek alternative routes.

Development at Southleigh would add substantially more vehicles to this already constrained part of the network. Additional traffic approaching the level crossing, Warblington Interchange and the A27 would increase congestion and make rat-running through nearby residential roads more likely.

Average modelled journey times cannot fully reflect the day-to-day variability created by railway-barrier closures, incidents and planned closures on the A27, school traffic, roadworks and drivers changing routes in response to congestion.

The evidence supporting the allocation must demonstrate that the network can operate safely and effectively during realistic peak and disrupted conditions, not simply under normal or average conditions. A network that appears to function in an average model but becomes seriously overloaded whenever the A27 is closed or the railway barriers are lowered cannot reasonably be described as resilient.

UNREALISTIC RELIANCE ON SUSTAINABLE TRAVEL

The plan appears to rely heavily on walking, cycling, public transport and behavioural-change measures to reduce the number of additional car journeys generated by Southleigh.

These measures are welcome, but they cannot substitute for sufficient highway capacity or a strategic vehicular access solution. The location of the site, the distribution of employment and services across the wider area and the physical barriers created by the railway mean that a substantial number of journeys will inevitably be made by car.

Allocation 1 expressly requires a new walking, cycling and public-transport bridge over the railway to connect Southleigh directly with the Emsworth Road/A27 Warblington junction. Policy 4 also safeguards land for this bridge. This confirms that the Council itself considers the bridge to be an important component of the infrastructure required to make Southleigh accessible and sustainable.

However, the June 2026 Infrastructure Delivery Plan does not provide an identified cost or a firm delivery date for this bridge. The indicative cost is recorded as "TBC", the anticipated funding source is the developer, and the timing and triggers are to be agreed with the Highway Authority. The current evidence therefore identifies the intended infrastructure but does not demonstrate with sufficient certainty when it will be delivered, what it will cost, whether it is viable or at what stage of the development it must become operational.

This uncertainty is particularly significant because a separate and less substantial proposal for a pedestrian footbridge at Warblington Station was put on hold by Havant Borough Council in July 2024 after it was found not to be financially viable. The previous scheme is not the same as the new bridge required by Allocation 1. Nevertheless, its history demonstrates the practical cost and delivery difficulties associated with constructing railway-crossing infrastructure at Warblington.

The new bridge required by Allocation 1 would be more substantial because it is intended to accommodate walking, cycling and public transport. It should not be treated as deliverable merely because land is safeguarded and the requirement appears in the allocation. Its technical feasibility, cost, funding, agreement with Network Rail and the relevant highway and transport bodies, delivery responsibility and construction timetable must all be demonstrated.

The absence of an identified cost and binding delivery programme is directly relevant to the effectiveness of the allocation. If the bridge is necessary to achieve the accessibility and modal-shift assumptions supporting Southleigh, it must be secured and operational before the number of occupied homes reaches a level at which the development depends upon it. It should not be left to an unspecified future phase or later negotiation with the developer.

The bridge would also not provide a general vehicular connection to the A27. Even if delivered, it would not remove the need to assess whether the existing highway network can accommodate the car journeys generated by Southleigh. Sustainable travel measures can reduce some journeys, but they cannot be used to avoid addressing the consequences of the remaining traffic.

Future residents will need to travel to workplaces, secondary schools, healthcare facilities, shops and other services outside the development. The identification of proposed sustainable-travel measures does not demonstrate that the assumed level of modal shift will actually be achieved and maintained, particularly where the principal bridge is not yet supported by a confirmed cost or delivery timetable.

A travel plan can encourage different choices, but it cannot guarantee them. Targets, monitoring and promotional measures do not create additional highway capacity and provide no effective remedy if residents continue to use their cars in greater numbers than forecast.

The Southleigh allocation must therefore be assessed using cautious and realistic assumptions about car ownership, journey patterns and driver behaviour. Existing communities should not bear the consequences if optimistic assumptions about modal shift prove incorrect.

Before the allocation can be considered effective, the plan must demonstrate that the proposed walking, cycling and public-

transport bridge is technically feasible, viable, fully funded and capable of being delivered at the stage when it is required. Binding phasing or occupation limits should prevent the development from progressing beyond an appropriate point before the bridge is operational.

UNCERTAIN AND UNFUNDED INFRASTRUCTURE

The Southleigh proposals refer to a primary school, local centre, mobility hub, open space, community facilities, public transport and active-travel connections. However, these facilities cannot be relied upon unless their funding, timing and delivery are secured.

The June 2026 Infrastructure Delivery Plan demonstrates that a number of Southleigh infrastructure requirements remain dependent upon future developer funding, later agreement or delivery in tandem with development. For the proposed walking, cycling and public-transport bridge in particular, the indicative cost is still to be confirmed and the triggers and phasing remain to be agreed with the Highway Authority.

Infrastructure that is merely identified as a requirement, dependent upon later negotiation or deferred to future planning applications does not provide sufficient evidence that the strategic allocation is deliverable.

Essential infrastructure must be delivered before the homes that depend upon it are occupied. Clear delivery bodies, funding arrangements, timescales and enforceable triggers must be identified for:

- strategic and local highway improvements;
- the new walking, cycling and public-transport bridge over the railway;
- safe pedestrian crossings and continuous walking routes;
- measures protecting pupils travelling to and from Warblington School;
- reliable and frequent public transport;
- safe and useful cycling connections;
- sufficient school capacity;
- healthcare provision;
- drainage and flood-management infrastructure; and
- the local centre and community facilities.

These matters are central to deciding whether the allocation is sustainable and deliverable. They cannot simply be deferred to the planning-application or reserved-matters stages.

The cost of measures required to address traffic and safety problems generated by Southleigh must be met by the development. Existing residents, local councils and the parish should not be expected to fund mitigation made necessary by the allocation.

CONSTRUCTION TRAFFIC

Development of approximately 2,100 homes under the Local Plan allocation would take place over many years and generate a substantial number of HGV, contractor and delivery movements.

Southleigh Road and other residential roads must not be treated as suitable construction routes. HGV movements would be particularly inappropriate near existing homes and Warblington School and would create additional noise, vibration, pollution and safety risks.

The cumulative impact of construction must be assessed over the entire development period rather than treating each phase as a separate and temporary event.

The plan should identify suitable and enforceable construction routes and demonstrate that major construction traffic can reach the site without passing along unsuitable residential roads. If this cannot be achieved, it raises a further question about whether development at the proposed scale is deliverable without unacceptable effects on existing communities.

LOSS OF THE SOUTHLEIGH GAP

The proposed allocation would develop a substantial part of the remaining open land separating Havant, Denvilles and Emsworth.

This land performs an important function by preventing the settlements from merging and helping to preserve their separate identities and character. Development on this scale would result in a permanent and irreversible change to the area.

Areas of open space incorporated within a large housing development would not perform the same function as the existing

open landscape. Landscaped corridors and recreational areas surrounded by housing cannot compensate fully for the loss of undeveloped countryside or the wider sense of separation it provides.

Once the gap has been developed, its open character and settlement-separation function cannot be restored. The plan must therefore demonstrate convincingly why development at the proposed scale is justified and why a substantially reduced allocation or alternative strategy would not be more appropriate.

ECOLOGY, LANDSCAPE AND DRAINAGE

Development on this scale would cause extensive disturbance and fragmentation of farmland, trees, hedgerows and wildlife corridors.

The ecological assessment must consider the cumulative and long-term consequences of construction, traffic, artificial lighting, domestic activity, recreational pressure and disturbance from pets. Retaining isolated pockets of habitat within a large housing development does not necessarily preserve their existing ecological function.

Any biodiversity mitigation must be genuinely additional, appropriately located and secured for the lifetime of the development through credible management and funding arrangements.

Replacing extensive areas of open land with roads, roofs and other hard surfaces would also alter drainage across the site. The evidence must demonstrate that development can safely manage surface water and groundwater throughout its lifetime, including the effects of climate change, without increasing flood risk to existing homes, roads or neighbouring land.

Drainage infrastructure must be delivered before occupation, with clear and accountable arrangements for its permanent maintenance and funding.

CUMULATIVE EFFECTS ACROSS THE BOROUGH

The effects of Southleigh cannot properly be considered in isolation.

The assessment must include committed and proposed development across Havant, Emsworth and the wider borough, including Campdown and other Local Plan allocations. These developments would place additional demands on the same strategic roads, junctions, railway crossings, schools, healthcare services and community infrastructure.

The developer's own submitted evidence for Southleigh reportedly identifies local junctions that would fail or operate over capacity under the forecast development scenario. This reinforces the concern that the allocation is being advanced despite evidence that parts of the surrounding road network may be unable to accommodate the traffic it would generate.

Southleigh and Campdown together account for close to one third of the plan's anticipated housing provision. Both sites were considered insufficiently deliverable during the previous Local Plan process.

The Campdown planning application has also reportedly been subject to a long-running objection from National Highways while further information is sought about the effects on nearby junctions, including the Asda roundabout.

These two allocations are not separate from one another in transport terms. Traffic from Southleigh, Campdown and other planned development would affect the same interconnected strategic and local network, including the A3(M)–A27 interchange, the Purbrook Way junction, the Rusty Cutter and Asda roundabouts and the limited routes crossing Havant's railway lines.

The relevant question is not whether an individual junction can technically accommodate one phase of one development under selected modelling assumptions. It is whether the complete local and strategic network can safely and effectively accommodate all anticipated growth over the plan period, including during foreseeable periods of disruption.

Reliance on two sites with unresolved infrastructure and deliverability issues for such a large proportion of the housing supply creates a significant risk that the plan's housing trajectory will not be achieved.

If either site delivers fewer homes, starts later than anticipated or requires infrastructure for which funding has not been secured, the consequences for the overall housing strategy would be substantial. The plan does not appear to provide an adequate contingency for that risk.

PREVIOUS INSPECTORS' CONCERNS

Inspectors examining the previous Local Plan raised significant doubts about whether Southleigh and Campdown could be reliably delivered. Information subsequently provided by the Council in 2022 reportedly confirmed that Campdown had already failed the Government's test for a deliverable site and acknowledged that the Southleigh housing figures had initially been carried over from the withdrawn plan "for consistency" and would need to be revisited to address the Inspectors' concerns.

Southleigh has now been included again at a very similar overall housing figure. The Council must therefore provide clear and updated evidence demonstrating how the previous Inspectors' concerns have been overcome.

The existence of a current planning application for up to 1,800 homes does not itself establish that the wider allocation of approximately 2,100 homes is deliverable. The large volume of transport evidence and the unresolved issues arising from that application demonstrate that deliverability remains a live and material question.

The Local Plan should not proceed on the assumption that the grant of planning permission is inevitable or that unresolved transport and infrastructure issues will necessarily be overcome later.

WHY THE PLAN IS NOT EFFECTIVE

The plan is not presently shown to be effective because:

- Southleigh has not been demonstrated to be deliverable at the proposed scale within the stated timescale.
- A necessary strategic vehicular transport solution, including direct general-traffic access to the A27, has not been secured.
- The proposed walking, cycling and public-transport bridge would not provide a general vehicular connection or resolve the effect of development traffic on existing roads.
- The local highway network is already constrained by railway crossings, overloaded junctions and limited east–west routes.
- The developer's submitted evidence reportedly identifies local junctions that would fail or operate over capacity under the forecast development scenario.
- Southleigh Road would experience substantial permanent increases in traffic while continuing to serve as an established A27 diversion route.
- The combined effect of development-generated traffic and foreseeable A27 diversion traffic has not been adequately addressed.
- The proposed walking, cycling and public-transport bridge has no confirmed cost, firm delivery timetable or agreed triggers and phasing.
- The history of the separate Warblington Station footbridge demonstrates the cost and delivery difficulties associated with railway infrastructure at this location.
- The plan relies on optimistic assumptions about modal shift and future travel behaviour.
- The capacity and safety of surrounding roads and junctions remain unresolved.
- The cumulative effects of Southleigh, Campdown and other planned development have not been satisfactorily addressed.
- The housing trajectory depends disproportionately on two sites previously considered insufficiently deliverable.
- There is no convincing contingency if either allocation is delayed or delivers fewer homes than anticipated.
- Essential infrastructure is not supported by sufficiently clear funding, delivery bodies and timescales.

WHY THE PLAN IS NOT JUSTIFIED

I also question whether the strategy is justified because the evidence currently available does not demonstrate that allocating Southleigh at this scale is the most appropriate strategy when compared with reasonable alternatives.

The Sustainability Appraisal and transport evidence should properly assess alternatives including:

- a substantially reduced Southleigh allocation;
- a slower rate of development;
- development conditional upon the prior delivery of a funded strategic highway connection;
- development conditional upon the timely delivery of the proposed walking, cycling and public-transport bridge;
- the redistribution of housing to less constrained locations; and
- the removal of Southleigh from the housing trajectory unless and until its infrastructure requirements are demonstrably deliverable.

These alternatives should not be dismissed on the assumption that mitigation can be agreed later. Where strategic infrastructure is fundamental to the suitability of an allocation, its feasibility, funding and delivery must be demonstrated before the plan is found sound.

MODIFICATIONS REQUIRED TO MAKE THE PLAN SOUND

To make the plan sound, I request that the Council and Inspector:

1. Remove or substantially reduce the Southleigh allocation unless and until its transport and infrastructure requirements have been shown to be deliverable.

2. Require a comprehensive and independent cumulative transport assessment covering Southleigh, Campdown and all other relevant committed and proposed development, rather than considering each allocation in isolation.

3. Require the assessment to include realistic peak conditions, railway-barrier closures, planned and unplanned A27 closures, A27 diversion traffic, school traffic, construction traffic and likely driver route choices.

4. Assess the combined effect of permanent Southleigh-generated traffic and the substantial additional traffic, including HGVs, directed along Southleigh Road during A27 closures.

5. Identify the strategic and local infrastructure necessary to accommodate the development, including an appropriate strategic vehicular connection to the A27, together with confirmed funding, responsible delivery bodies and binding timescales.

6. Demonstrate the technical and financial viability of the proposed walking, cycling and public-transport bridge, including its estimated cost, funding, delivery responsibility, necessary agreements and construction timetable.

7. Include binding phasing and occupation limits within Allocation 1 so that development cannot progress beyond an appropriate stage before the new bridge and other necessary transport infrastructure are operational.

8. Make the phasing and occupation of Southleigh expressly conditional upon the prior delivery of the necessary strategic highway, walking, cycling, public-transport, education, healthcare and drainage infrastructure.

9. Provide effective measures to protect Southleigh Road's residential character, control vehicle speeds, create safe pedestrian crossings and protect pupils travelling to and from Warblington School.

10. Ensure that Southleigh Road and other unsuitable residential streets are not used for construction traffic and are not redesigned in a way that encourages further through-traffic or higher speeds.

11. Reassess the housing trajectory using realistic assumptions about infrastructure delivery, site lead-in times, annual completion rates and the potential for delay.

12. Provide an effective contingency should Southleigh or Campdown be delayed or fail to deliver the assumed number of homes.

13. Demonstrate clearly and transparently how the concerns raised by the Inspectors examining the previous Local Plan have now been addressed.

14. Properly assess reasonable alternatives, including a reduced allocation, slower phasing or development made conditional upon the prior delivery of funded strategic transport infrastructure.

CONCLUSION

Southleigh is a strategic development in scale, but it is not supported by a secured strategic vehicular transport solution.

The allocation would introduce approximately 2,100 homes into an area constrained by railway crossings, overloaded local routes and the absence of a direct general-traffic connection to the A27. It would substantially increase traffic on Southleigh Road, affect the safety and amenity of existing residents and school pupils, place further pressure on local services and result in the permanent development of much of the open gap between Havant and Emsworth.

Southleigh Road already has to absorb strategic traffic, including HGVs, when the A27 is closed. The plan has not adequately demonstrated that the road and wider network could safely accommodate this foreseeable diversion traffic alongside the permanent traffic generated by Southleigh.

The plan identifies a new walking, cycling and public-transport bridge over the railway as a requirement of Allocation 1. However, the June 2026 Infrastructure Delivery Plan records its indicative cost as still to be confirmed and leaves its timing, triggers and phasing to future agreement. Identifying and safeguarding the bridge does not, on its own, demonstrate that it is viable, funded or

capable of being provided before the development depends upon it.

The previous Warblington Station pedestrian footbridge was a separate project, but its suspension on financial grounds illustrates the genuine challenges involved in delivering railway-crossing infrastructure at this location.

Even if the new bridge is delivered, it would not provide a general vehicular connection to the A27 or remove the need to demonstrate that the existing road network can accommodate the remaining car journeys generated by Southleigh.

Necessary infrastructure has not been shown to be funded, secured and capable of being delivered before it is needed.

The plan also relies heavily on Southleigh and Campdown for its housing supply despite unresolved infrastructure and deliverability concerns affecting both sites. This creates a substantial risk to the effectiveness of the plan as a whole.

Until the necessary evidence is available and the required infrastructure is secured, it is premature to rely on Southleigh as a principal component of the borough's housing strategy.

For these reasons, the Southleigh allocation is not presently shown to be justified or effective, and the Building a Better Future Plan should not be found sound in its current form.