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	Mr
First Name	Andrew
Last Name	Hunnibal

[redacted]

Please provide the following details where applicable and/or relevant

[redacted]

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 (Land north of Long Copse Lane)
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 or 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 Council classifies this site as developable rather than deliverable, and its own assessment records that a revised application will be needed, that no developer is on board for one parcel and a development partner is still being sought for the other, that the yield is a promoter's figure not evidenced by any constraint analysis, and that ecological and nutrient mitigation may have significant impacts on viability. The site produces nothing before 2032/33 and is 4.4% of the Plan's supply. The soundness tests not met are justified and effective.

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.

Allocation 2: Land north of Long Copse Lane should be deleted from the Plan in its entirety, together with the consequential amendments to Policy 6, the sources of housing supply table, the housing trajectory at Appendix 1 and the Policies Map. The safeguarding of the existing Gypsy and Traveller site at Long Copse Lane under Policy 43 is unaffected and should be retained.

Deletion makes the Plan sound because the site cannot bear the weight the trajectory places on it. The Council classifies it as developable rather than deliverable; its own assessment records no developer on board for one parcel and a development partner still being sought for another; the yield is a promoter's figure the assessment itself records as unevidenced; and the Infrastructure Delivery Plan identifies no infrastructure for the allocation at all.

Deletion is achievable without creating unsoundness elsewhere. This allocation is 325 dwellings of a total supply of 7,087, or 4.4 per cent, and the trajectory records no completions on it before 2032/33 — so its removal leaves the Plan's five-year supply untouched and more than ninety-five per cent of its total supply in place.

I put forward no revised wording for any policy or criterion, and none is sought. My objection is to the allocation of this land, not to the drafting of the criteria attached to it. No revision of those criteria would meet it, because the matters set out in my representation go to whether this site should be allocated at all rather than to how an allocation of it should be worded.

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: Representation-4-Deliverability.docx - 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 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.

The representation turns on the Council's own site assessment, on the arithmetic of the housing trajectory, on the relationship between the trajectory's Southleigh assumption and the application now before the Council, and on how comparable findings were treated at the examination of the previous Local Plan. These are matters for testing in exchange.

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

Representation 6 — Landscape, cross-boundary matters and relative performance

Regulation 19 representation — Havant Borough Council, Building a Better Future Plan

Declaration of interest. I should record two interests. [redacted] *it lies outside both SHELAA parcels comprising Allocation 2 and no part of this representation concerns it. I am also the coordinator of the Save Long Copse Lane campaign group, which is submitting its own representation prepared with professional planning input; this representation is made in my own name and does not speak for the group.*

Why the allocation is unsound

The River Ems wildlife corridor is deferred rather than dealt with

I do not put this as a breach of the Duty to Co-operate; the Written Ministerial Statement of 27 November 2025 records the Government's position that the Duty is not retained as a distinct legal test. I put it under justified, and under the NPPF's requirement for maintaining effective co-operation, applying the test the Statement of Common Ground sets for itself at paragraph 1.3: cross-boundary strategic matters must be "dealt with rather than deferred". That paragraph also records that the December 2025 draft NPPF's replacement test of "realistic" is identical in wording to the current definition of "justified", so the test does not fall away with the change.

The June 2026 SoCG lists wildlife corridors as a strategic cross-boundary matter. Paragraph 6.30 records that the River Ems forms the boundary between the two authorities and that Chichester's Local Plan designates a strategic wildlife corridor on its eastern bank, the western bank lying within Havant Borough. The entirety of the recorded agreement, at paragraph 6.31, is that both parties recognise the river's importance as a wildlife corridor.

Havant's own Sustainability Appraisal identifies, for both EM01 and EM02, "Potential for impacts to green corridor linking Southleigh Forest with River Ems and coastal zone". SA Appendix E identified mitigation of those impacts as part of the purpose of the ecological and landscape buffer.

So: Havant's evidence base identifies that this allocation may affect the corridor; Appendix E made mitigation of that effect part of the buffer's purpose; Chichester has designated a strategic corridor on the opposite bank; and the agreed position amounts to a shared recognition of importance, with no assessment, no agreed mitigation and no agreed position on the effect of this allocation. Allocation 2 does not name the River Ems corridor at all, and criterion (m) omits the corridor from the buffer's stated purpose. Criterion (j) addresses only connections between the South Downs National Park and Chichester Harbour National Landscape. Allocation 1, by contrast, requires at criterion (l) that a named green corridor be maintained and enhanced.

I note fairly that a single 325-dwelling allocation is not automatically a strategic matter. The point has force because the Councils themselves list wildlife corridors as strategic, and because Havant's own site appraisal identifies the effect.

That has a consequence the Plan does not address. The only application ever made on this land, APP/21/00893, tested approximately 210 dwellings on 14.6 hectares — not the whole of the area now allocated. The fields added in the north west were not within its red line and were not surveyed for it, and the SHELAA records no constraint analysis or site-specific survey work for them; nor have I found any elsewhere in the published evidence base. They are also the part of the site the Plan's own Key Features list associates with the principal constraints: Tree Preservation Order woodland which "bounds part of the northern boundary and extends into the north west of the site", and the adjacent Southleigh Forest Site of Importance for Nature Conservation.

So the position is that a yield of 325 dwellings, itself unevidenced, is attributed to an area that has never been assessed as a whole and is promoted as three separate interests, the newest and least examined of which carries the constraints the SHELAA says are likely to reduce the developable area once the work is done.

I put this fairly. Land assembled from several ownerships is common, promoters frequently work together, and multiple interests are not by themselves an obstacle to delivery — the Council will say so, and it will be right as a general proposition. The difficulty is specific to the evidence here: the Council is relying for a plan-period commitment on a yield that no application has tested across this area, on land part of which entered the process for the first time in 2025, while its own assessment records that the constraint analysis which would establish the developable area has not been carried out.

The site's place in the trajectory: small, late, and entirely back-loaded

The housing trajectory at Appendix 1, printed page 358, and Table 5, the sources of housing supply table at printed pages 61 to 62, set out the Plan's supply. Both are consistent, and the figures below are taken from them.

The Plan's total supply over the plan period is **7,394 dwellings** before non-implementation discounts, and **7,087** after them; Policy 6 at printed page 59 provides for "at least 7,087 new dwellings", and its footnote 31 records that the figure is "7,087 dwellings when applied relevant non-implementation discounts; 7,394 dwellings when non-implementation discounts are not applied". Table 5 adds a duty-to-cooperate contribution of 345 dwellings from Winchester City Council to give a total of 7,432. Of the 7,394, some 1,179 are completions already achieved in 2022/23 to 2024/25, leaving 6,215 across the eighteen years from 2025/26 to 2042/43.

Against that, this allocation is recorded as follows:

	Dwellings
Allocation 2, net number of dwellings	325
2025/26 to 2031/32	nil
2032/33	30
2033/34, 2034/35, 2035/36, 2036/37, 2037/38	50 in each year
2038/39	45
2039/40 onwards	nil

Table 5 records the same, split across its two columns as 30 dwellings in Years 1–11 and 295 in Years 12–21 — the two accounts reconciling on the basis that Year 1 of the plan period is 2022/23, so that Year 11 is 2032/33.

Three consequences follow, and they are arithmetic rather than argument.

The site is 4.4% of the Plan's total supply. 325 against 7,394 — or 5.2% of the 6,215 dwellings still to be delivered from 2025/26, or 4.6% of the discounted 7,087.

It contributes nothing for the first seven years from now. The whole of the Plan's supply in 2025/26 to 2031/32 comes from completions, extant permissions, windfall, small and medium sites and other allocations. Across the six years 2025/26 to 2030/31 the entire "Allocations (housing)" block of the trajectory contributes 366 dwellings — nil, nil, nil, 56, 137 and 173 — which is 4.95% of the Plan's total supply and 22.6% of the 1,617 dwellings the trajectory records for those six years. Every one of those 366 comes from other sites: Kingscroft Farm, South Downs College Car Park, Goodwillies Timber Yard, Padnell Grange, Blue Star, Helmsley House and Land east of Castle Avenue.

Nor is it alone in that. The Plan's three largest greenfield contributions — the Southleigh strategic site at 1,650 dwellings in the plan period, Campdown at 590 and this allocation at 325 — total 2,565 dwellings, which is 34.7% of the Plan's total supply and 41.3% of the supply still to be delivered from 2025/26. None of the three delivers a single dwelling before 2031/32, and this one delivers nothing before 2032/33.

One consequence of that phasing can be stated with certainty, because a Planning Inspector has recorded the Council's own position on it. In appeal decision 6002048, dated 24 June 2026, the Inspector recorded at paragraph 24 that "the Council confirms that it is unable to demonstrate a 5-year housing land supply", and applied the tilted balance accordingly. At paragraph 2 the Inspector gave the emerging Plan limited weight, given the early stage of the process and the level of unknown objections.

I draw one narrow conclusion from that and no other. **The five-year position, whatever it is, is unaffected by this allocation in either direction.** On the Council's own trajectory this site produces nothing until 2032/33, so it contributes nothing to the five-year supply while it remains in the Plan, and its deletion would remove nothing from it. Whatever the Council's five-year position is at the point of examination, it will be the same with this allocation as without it.

I am not inviting the Inspector to find that the Borough's supply falls short, and nothing in this representation depends on that. The Plan's own position, at paragraph 2.107, is that its requirement is capacity based rather than need based. My point is confined to the consequence for this site: the usual reason for retaining a contested greenfield allocation — that the supply cannot afford to lose it — does not arise here, because this allocation is not carrying any part of the five-year position that the Council was addressing in June 2026.

I do not put that as a complaint that the Plan is back-loaded. A trajectory that brings brownfield and permitted sites forward first and large greenfield sites later is orthodox, and the Council is entitled to phase in that way. I put it for a narrower purpose, which goes to the weight this allocation can bear. A site that supplies 4.4% of total supply, that is not expected to produce a dwelling for seven years, and whose removal would leave the five-year supply untouched, is a site whose contribution is neither early nor large. The evidence required to justify carrying it — against a Council assessment that records no

developer on board for EM01 and a development partner still being sought for EM02a, no live application, an unevidenced yield and identified viability risk — is correspondingly harder to supply.

The trajectory's largest component is not borne out by the application now before the Council

The 7,394 figure above depends on Southleigh delivering 1,650 dwellings within the plan period. That assumption can now be tested against an application, because one was submitted during the preparation of this Plan and is due for decision shortly after this consultation closes.

Outline application **APP/26/00324**, *Land to the east of Denvilles, Havant, known as Southleigh*, by Bloor Homes Limited and landowners, was received on 12 May 2026 and validated on 3 June 2026. It is scheduled for determination by Planning Committee on **23 September 2026**. Its application form records "Total proposed residential units 1800", a net gain of 1,800, and a site area of "106.55" hectares. Hampshire County Council's education response of 21 August 2026 is headed "APP/26/00324 - 1800 residential dwellings" and calculates its contributions on "1,800 eligible dwellings".

The evidence base now carries four figures for this site, three of them within the Plan:

Source	**Dwellings**	**Site area**
Plan paragraph 2.105, printed p. 59	"around 2,100"	—
Plan site profile, printed p. 90	"2100 (of which 1,500 in the plan period)"	**146.32 ha**
Plan Table 5, printed p. 62	**150** in Years 1–11 plus **1,500** in Years 12–21 = **1,650** in the plan period	—
Application APP/26/00324	**1,800** in total	**106.55 ha**

The application is therefore for **300 fewer dwellings than the allocation, on approximately 73 per cent of the allocated area**. Some 40 hectares of the allocation is not within it and would require a further application which does not exist. For Table 5 to hold, **1,650 of those 1,800 dwellings — 92 per cent of the entire application — would have to be completed by 2042/43**, 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". The highway authority has meanwhile asked, on 28 July 2026, that a holding objection be maintained on the application for insufficient information.

I raise this as a question about the quality of the Plan's evidence, and expressly not as an argument that the Borough's housing supply falls short. I do not ask the Inspector to find that Southleigh will under-deliver, and I do not seek any increase in the requirement, any additional allocation, or any finding about the adequacy of supply. Were the Inspector to conclude that the supply is short, the remedy available would be to retain greenfield allocations, which is the opposite of what I seek. The point is confined to this: the Plan's trajectory rests on an assumption about its largest allocation which the application now before the Council does not bear out, and a Plan whose supply table is built on an assumption its own live application contradicts has not demonstrated that its figures are soundly evidenced. That goes to justified and to effective, and it bears on this allocation because the same trajectory is the sole basis on which 325 dwellings are attributed to this site.

This land has been proposed for allocation once before, and that allocation delivered nothing

Land north of Long Copse Lane was proposed for allocation as Policy H8 of the Havant Borough Local Plan 2036. That plan was withdrawn from examination on 16 March 2022; the Council's Statement of Fact under Regulation 27, published on its own website, records that "the withdrawal of the Havant Borough Local Plan was authorised at Full Council on 16 March 2022, and was formally withdrawn on the same date". The outline application on this land, APP/21/00893, was submitted in August 2021 and withdrawn in June 2025 — a period of nearly four years, without a determination. The SHELAA records that a revised application will be needed, that as at October 2025 the promoter of EM02a was seeking a new development partner, and that for EM01 there is no developer on board.

I do not suggest that the previous plan binds this examination. It was withdrawn and its allocations never took effect, and I make no assumption about why the application was neither determined nor pursued. The relevance is narrower and goes to the evidence for treating this site as a dependable component of supply. On the only occasion this land has been tested through the development management process, a proposed allocation and a live planning application together produced nothing over nearly four years, and the site has emerged from that process still under promotion but with no developer on board for one parcel, a development partner still being sought for the other, no live application and no constraint analysis. The Plan nonetheless relies on it for 325 dwellings.

The access works this site depends on are not certain, on the Inspectorate's own assessment

There is a further matter bearing on whether this allocation can be delivered, and it comes from the same appeal decision. At paragraph 12 of decision 6002048 the Inspector recorded that "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", and concluded: "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."

The land to the north of Long Copse Lane is this allocation. I do not know whether the description of the works came from the Council or from the appellant, and I put it no higher than the decision does. The material point for deliverability is the Inspector's own conclusion, reached in June 2026 with the Council before him: there is no certainty that the access works this land requires will be implemented. The Council's Infrastructure Delivery Plan does not cost them, does not fund them and does not programme them; its Strategic Transport Assessment states at paragraph 9.2.1 that the strategic modelling "does not allow the identification of a link between the potential mitigation and specific Local Plan allocation sites"; and the application that would have delivered them was withdrawn in June 2025 without determination.

How the previous examination treated comparable facts

The Inspectors examining the withdrawn plan made findings on other sites in this borough that bear directly on the question here — what an Inspector does with a site carrying unresolved habitats mitigation and no developer. Their Interim Findings are published on the Council's own website.

- At Rook Farm (Policy H27), mitigation for Solent Waders and Brent Geese had not been secured and it was unclear whether it could be. At paragraph 35 the Inspectors found that "it is unclear whether an appropriate mitigation site can be secured, and there are consequently, in our view, significant

uncertainties over the site's delivery. Given this, we are unable to find that the site currently meets the definition of 'deliverable' or 'developable' as set out at Annex 2 of the NPPF. On this basis, 390 dwellings should be removed from the Council's anticipated supply."

- At Campdown (Policy H40), on materially the same facts, they concluded at paragraph 38 that "the site does not currently meet the definition of 'deliverable' or 'developable' as set out at Annex 2 of the NPPF. On this basis, 650 dwellings should be removed from the Council's anticipated supply."
- At Southleigh (Policy KP5), the Inspectors recorded at paragraph 29 that "the principal site owner is waiting for the site to be allocated before investing heavily in bringing the site forward. It is also understood that a developer has not yet been engaged." Taken with the volume of assessment work outstanding, that led them to conclude that a planning application was unlikely within two years, and in turn, at paragraph 33, that first completions were "unlikely to occur until 9–10 years from now. As a result, and based on the assumed delivery rate of the Council, this removes 400 dwellings from the Council's anticipated supply over the Plan period."

Both strands are present here — the absence of any developer, and unresolved habitats mitigation. The SHELAA records that a revised planning application will be needed, that as at October 2025 the promoter of EM02a was seeking a new development partner and that on EM01 there is no developer on board, so there is no application in prospect on any stated timescale; and it identifies protected-species and nutrient mitigation as matters that may significantly affect the viability of delivery — the same category of unresolved habitats constraint that at Rook Farm and Campdown was held to defeat not merely deliverable status but developable status. Developable is the status this site has been given.

I should be clear about what I am not saying. This land is actively promoted, and has been for years. Both SHELAA parcels have promoters; a masterplan exists for the wider area; an outline application was prepared and submitted in 2021; and access works for the site have been described to the Planning Inspectorate as recently as June 2026. I do not suggest that nobody is interested in developing this land, and I would expect its promoters to appear at this examination and say so.

The distinction I draw is between promotion and delivery, and it is the distinction the Inspectors drew at Southleigh. A promoter takes land through allocation and consent; a housebuilder builds it. At Southleigh there was a principal site owner and active promotion, and the Inspectors nonetheless recorded that "a developer has not yet been engaged", concluded that first completions were unlikely for nine to ten years, and removed 400 dwellings from the supply. Active promotion did not answer the question there and does not answer it here. What the Council must show for a plan-period commitment is a realistic prospect of the dwellings being built within it, and on its own assessment the elements that would evidence that — a developer, a live application, an evidenced yield, a defined developable area — are absent.

The Council may answer that these promoters, like Southleigh's, are simply awaiting allocation before investing further. That answer was available at Southleigh too, and did not prevent the Inspectors reducing the supply figure. It is also harder to run here, because this land has already had the benefit of a proposed allocation in the withdrawn Local Plan 2036 and a live planning application, and produced no determination from either in nearly four years.

I record one point that runs the other way, because it is material. Campdown, the site from which those Inspectors removed 650 dwellings on the ground that it met neither definition, returns in this Plan as Allocation 23 at 590 dwellings, and on the trajectory it is the second largest contributor of any allocation. I do not assert that the objections recorded in 2021 remain outstanding, and I have not

tested that; the Council may well be able to show that the mitigation which was then unsecured has since been secured. I ask only that it be required to say so on the record, and to explain what changed, because the Plan's supply now leans on two large greenfield sites of which one was previously found not to meet the NPPF definition of developable and the other, this one, has never been the subject of a determined application.

I put these findings as context, not as precedent. That examination concerned a different plan, different sites and a different evidence base; the findings were interim; the plan was withdrawn before they were finalised; and the Council has since rebuilt its evidence base. They bind nothing and I do not suggest they determine this site's status. They are, however, the most recent occasion on which this Council's housing supply assumptions were tested by an Inspector, and the reasoning applied then is a fair guide to the weight this allocation can bear now.

How 18.9 hectares became 325 dwellings

The figure is the sum of two SHELAA yields: 50 dwellings at 35 dph on EM01a/b and 275 dwellings at 27 dph on EM02a/b, the densities applying to net developable areas, which the SHELAA does not publish, derived from gross parcels of 1.78 and 17.1 hectares. The larger component is the promoter's own unevidenced estimate, adopted without the site-specific constraint analysis the SHELAA says has not been carried out — on a site the same document says is likely to have its developable area constrained by ecological mitigation and TPO woodland. An allocation figure derived this way is not a justified basis for a plan-period commitment.

The method by which SHELAA yields were derived does not, on its own terms, extend to this site. The Council's *Residential Density Evidence Paper* of August 2025 states at paragraph 1.2 that it "has informed the SHELAA's methodology, in terms of the calculation of site yields for housing sites based on areas close to town and district centres, including areas close to public transport", and at paragraph 1.14 that "for the purposes of the SHELAA, the Council has used standard gross-to-net density ratios based on different site sizes", while acknowledging that detailed technical work by the developer may further refine the developable area. The scope that paragraph 1.2 gives itself is sites close to town and district centres and close to public transport. The Council's own Strategic Transport Assessment ranks this site last of the thirty-four allocations assessed for connectivity, and lowest of all for public transport.

I do not say that the yield should be higher, and I am not inviting any change to it. I say that the Plan does not explain how this site's yield was arrived at: the larger component is a promoter's figure the SHELAA records as unevidenced, the constraint analysis that would establish the developable area has not been done, and the only published account of the yield methodology limits itself to a category of site this one is not. The figure of 325 is therefore not established in either direction, and a plan-period commitment has been built on it.

The Council's own infrastructure evidence does not carry this allocation

The Infrastructure Delivery Plan (IT01, June 2026) is the document by which the Plan demonstrates that the infrastructure needed to support its allocations has been identified, costed, funded and programmed. Its paragraph 1.5, at printed page 2, states its purpose and its method:

> *"The IDP is intended to be a live document that can be updated through active monitoring to inform decisions, including the spending of Community Infrastructure Levy (CIL). To assist in this, one of*

four categories have been applied to the infrastructure identified in the solution tables identified in Appendix 2 (additional information on the categories is provided in Appendix 3)."

Three features of that document bear on whether this allocation is effective.

First, it does not identify infrastructure for this allocation. The document identifies infrastructure by settlement area — Emsworth, Havant, Hayling Island, Waterlooville, Boroughwide — with the single exception of Southleigh, which has its own solution table at Appendix 2B. The words "Long Copse", "EM01", "EM02" and "Allocation 2" appear nowhere in its 179 pages. No entry in Appendix 2A is attributed to this allocation, costed against it, or triggered by it.

Second, on education it directs the reader elsewhere. Under the heading "Education — Primary and Secondary Schools and 16+", at printed page 142, the entry for Emsworth reads, in its entirety: "See Southleigh Strategic Site Table B". The Emsworth heading carries no solution of its own. The solutions to which the reader is directed — a new 3-form-entry primary school at £14,500,000 and a secondary expansion at £9,250,000 — are recorded in Appendix 2B as funded by "Future developer funding", sized on Southleigh's yield, and in the secondary school's case expressly to be delivered "in line with pupils leaving the new primary school built to serve Southleigh". The Early Years entry for Emsworth, E001, provides approximately 25 places at £250,000 with a timing of "Variable", no site and no committed funding.

The same pattern appears in primary care. Appendix 2A entry H001 is a £920,000 extension to Emsworth Medical Practice, funded by the Integrated Care Board alone, with no developer contribution and a timing of "To be confirmed". Appendix 2B entry H010 then justifies Southleigh's primary care solution by recording that "currently there is capacity at Emsworth Medical Practice for 2,072 additional patients (April 2024)". The same practice, and the same headroom, is doing duty for a 2,100-dwelling strategic site and, by implication, for this one.

Third, the four-category prioritisation the document says it has applied has not been applied. Appendix 3, at printed page 175, defines four categories — "Critical – Delivery", "Critical – Local Plan", "Essential" and "Important" — each with a definition and worked examples. Appendix 2A, Appendix 2B and Appendix 2C contain no categorisation column, and no category is assigned to any entry in any of them. The word "Critical" appears on only two pages of the whole document: an unrelated passage on Fire and Rescue response times, and the definition table at Appendix 3 itself. So the Plan's infrastructure evidence asserts a prioritisation exercise which its own tables show was not carried out.

I put the third point at the level it belongs. Taken alone it is an editorial defect capable of correction by a main modification, and the Council will say so. Its value is corroborative: it goes to how far the Infrastructure Delivery Plan was worked through, and therefore to how much weight can be placed on the absence of any entry attributable to this allocation.

Stated fairly

The SHELAA concludes that there is a reasonable prospect the site could be developed at some point, and classifies it as developable. My argument is not that the Council's assessment says the site is undeliverable. It is that the Council's assessment establishes a site which, although actively promoted, has no developer on board for EM01 and none identified for EM02a, no live application, a yield the SHELAA itself records as unevidenced, an unquantified developable area, and identified viability risks from precisely the two constraints the rest of the evidence base leaves unresolved — and that the Plan's

own infrastructure evidence identifies nothing for it. Promotion is not delivery, and it is delivery within the plan period on which the trajectory depends.

The modification I seek

For the reasons above, and taken with the planning balance, I ask that Allocation 2: Land north of Long Copse Lane be deleted from the Plan in its entirety, together with the consequential amendments to Policy 6, the sources of housing supply table, the housing trajectory at Appendix 1 and the Policies Map. The safeguarding of the existing Gypsy and Traveller site at Long Copse Lane under Policy 43 is unaffected and should be retained.

Why this needs to be tested at a hearing

This representation turns on the Council's own SHELAA classification of the site as developable rather than deliverable, on the arithmetic of the housing trajectory, on the relationship between the trajectory's Southleigh assumption and the application now before the Council, on the absence of any entry for this allocation in the Infrastructure Delivery Plan, and on how the previous examination treated comparable sites. Whether this site can bear the weight the trajectory places on it is a matter of judgement on which oral examination of the Council's delivery evidence would assist.

I also ask that the following related matters be treated as live at examination and, so far as they bear on this allocation, examined orally. Each is a matter for Havant Borough Council to answer, and I ask that its answers be given in writing before the hearing sessions so that they can be tested:

- The basis of the housing requirement period. Paragraph 2.104, at printed page 59, derives the standard method figure of 15,822 dwellings as "879 homes per annum", which corresponds to eighteen years, while Policy 6 on the same page states supply of "at least 7,087 new dwellings" over a plan period of 2022–2043, being twenty-one years, "averaging 337 dwellings per annum". I ask that the Council set out the periods over which need and supply are each calculated, so that the two figures can be compared on a common basis.
- The Plan's internal statement of its own shortfall. Paragraph 2.108, at printed page 60, 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". On the Plan's own figures the arithmetic is 15,822 less 7,087, which is 8,735, and 7,087 of 15,822 is 44.8 per cent. Paragraph 2.108's two statements together imply provision of approximately 6,300 dwellings rather than 7,087. The figures are some 800 dwellings and roughly five percentage points apart, within the same policy chapter and on consecutive pages. I raise this as a matter of internal consistency in the Plan's own account of its figures, in the same terms as the Table 5 arithmetic below, and for no other purpose; I make no submission that the requirement should be higher or lower.
- The Plan's Southleigh figures, of which the evidence base now contains four, three of them within the Plan itself and one in the application now before the Council. The site profile for Allocation 1 at printed page 90 gives the indicative yield as "2100 (of which 1,500 in the plan period)". Table 5 at printed page 62 records Southleigh at 150 dwellings in Years 1–11 and 1,500 in Years 12–21, being 1,650; and the housing trajectory at printed page 358 records 50 dwellings in 2031/32, 100 in 2032/33 and 150 in each of the ten years from 2033/34, which is also 1,650. The Plan's stated total supply of 7,394 depends on 1,650. Separately, SA Appendix B models the site at 1,650 across Options 2, 3 and 4, and the nutrient budget at HRA Appendix 3 enters it at 1,500. Outline application

APP/26/00324, due for determination on 23 September 2026, is for 1,800 dwellings on 106.55 hectares. I ask that the relationship between these figures, and the delivery assumptions underlying each, be set out on the record; that the Council state which is the operative figure for the plan period; and that it explain how 1,650 completions by 2042/43 are to be reconciled with an application for 1,800 dwellings in total covering approximately 73 per cent of the allocated area.

- The arithmetic of Table 5. Its own components for the discounted position are 3,610 and 3,477, which sum to 7,087 — the figure Policy 6 and footnote 31 both use, and the figure that with the Winchester contribution of 345 produces the 7,432 the table records on its final line. The intervening line of the same table records "Housing supply over Plan Period 7085". I ask that the table be corrected.
- The extent of the area allocated against the extent ever assessed. APP/21/00893 tested approximately 210 dwellings on 14.6 hectares; the allocation is 18.9 hectares for 325 dwellings; and the SHELAA records that EM02b includes fields in the north west not previously promoted. I ask the Council to confirm what proportion of the allocated area has been the subject of ecological survey or constraint analysis at any time, and on what basis a yield was attributed to the part that has not.
- The Infrastructure Delivery Plan (IT01, June 2026). I ask the Council to identify which entries in Appendix 2A it relies on as the infrastructure supporting this allocation; to state what primary and secondary school capacity is available to it, given that the Emsworth entry is a cross-reference to the Southleigh table; and to explain why the categorisation described at its paragraph 1.5 and defined at its Appendix 3 does not appear against any entry in Appendix 2.
- Allocation 23, Campdown. The Inspectors' Interim Findings on the withdrawn Local Plan concluded at paragraph 38 that the site did not meet the NPPF definition of deliverable or developable and that 650 dwellings should be removed from the Council's supply. It is allocated in this Plan for 590 dwellings and is the second largest allocation contribution to the trajectory. I ask that the Council set out what has changed since those findings, and what evidence now supports the site's inclusion.

Representation form entries

Field	Entry
Respondent	Andrew Hunnibal — individual response
Contact	Longacre, Long Copse Lane, Emsworth, Hampshire PO10 7UR · ahunnibal@gmail.com
Policy Number	—
Allocation Number	2 (Land north of Long Copse Lane)
Paragraph Number	—
Page Number	Printed pp. 95–97 (PDF pp. 99–101)
Legally compliant?	Yes
Sound?	No
Test(s) of soundness	Justified; Effective
Change sought	Deletion of Allocation 2 in its entirety
Appear at hearings?	Yes
Date	4 September 2026