Building a Better Future Plan - Representation Form

Part A - Personal Details

Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client

I am completing this form myself

Part A - Personal Details (Completing form on own behalf)

Please provide the following personal details.
Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.
The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

Title	Dr
First Name	Mike
Last Name	Bateman

[redacted]

Please provide the following details where applicable and/or relevant

Job Title	Committee member
Organisation	Emsworth Residents Forum

Part A - Personal Details (Agent on client's behalf)

If an agent is appointed, please provide the following information:
Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.
The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

No Response

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

No Response

Part B - Your representation(s)

Which part of the Building a Better Future Plan does your representation relate to?
Please provide as much detail as possible.
If you wish to make a change to the Policies Map, please comment on the corresponding policy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form
A full list of policies and allocations can be found in the contents page(s) of the Publication Plan - you can access this document here.

Policy Number	-
Allocation Number	1
Paragraph Number	-
Page Number	89

Do you consider the Local Plan is ...
(Please select as appropriate)

	Yes	No
Legally compliant	X	
Sound		X

Please give details of why you consider the Building a Better Plan is not legally compliant o r is unsound. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The Emsworth Residents Forum objects to the allocation of Southleigh (2100 houses but not all in the plan period) within the July 2026 Publication Building a Better Future Plan.

This allocation fails the mandatory Tests of Soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF). It is fundamentally unjustified, ineffective, and inconsistent with National Policy for the reasons detailed below.
The allocation is unsound on the following four grounds:

1 Deficient Transport Evidence and Critical Highway Bottlenecks (Unsound: Unjustified and ineffective)

The Council's strategic transport modelling fails to simulate accurately the severe traffic congestion that Southleigh, without a direct link to the primary road network, will impose on the A259 corridor, the B2148, and key junctions of the A27. By combining Southleigh's significant trip generation with nearby satellite allocations (including Long Copse Lane and the Horse Field), crucially without the originally planned link road from Southleigh to the A27, the plan forces an unsustainable volume of vehicles onto the already constrained local network. Increased traffic on the A259 will have a negative impact on the efficiency of east-west bus services at a time when they are required to offer an enhanced attraction as an alternative to car travel.

The impact on the local network with the link road has not been modelled.

The sustainability assessment report indicates "significant infrastructure improvements will be required to make it acceptable in accessibility terms" (Appendix E SA Report – Negative effects and mitigation). Little or no off-site mitigation is proposed to make its accessibility more acceptable and in any event, there are few, if any options to increase highway capacity.

The modelling set out in the Strategic Transport Assessment also fails to take into full account of the cross-boundary impacts, since it incorporates only the new developments within Southbourne and not those further east in the A259 corridor.
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The underlying argument for the exclusion of the link road to and from Southleigh to the A27 is that there will be a shift away from private car use by making active travel routes more attractive – this forms the basis also for HCC's LTP4. Improving opportunities for more active travel and for public transport may have some impact, but there is no evidence presented to demonstrate how the very considerable modal shift required can be achieved in this suburban location.

For such policies to work research has shown that there has to be a "push and pull" approach, where restrictions on, or costs associated with, the use of private vehicles can go hand in hand with offering attractive accessible public transport options. That is an approach which is well suited to locations with high residential densities with easy access to rapid transit systems but it is not likely to work in dispersed semi-rural suburban locations.

So UK cities with light rail transit systems, coupled with unified ticketing and capped fares, have managed to increase the use of public transport. Manchester, Sheffield, Nottingham and Edinburgh are all examples of where a tram or light rail system have assisted modal shift. But such networks require large populations to support them and to justify the initial capital expenditure. In the case of Greater Portsmouth there are no plans for such a pull factor to be introduced, so any modal shift will in reality need to be based solely on persuasion.

The development of active travel routes can make a limited contribution to meeting transport needs but will not make a significant impact on commuting journeys from Southleigh, the majority of which extend beyond Havant's boundaries.

This essentially means that the traffic modelling falls short of what is required since its basic underlying assumption on achieving a significant modal shift, is flawed.

2 Severe Wastewater Capacity Deficits and Environmental Risk (Unsound: Not Effective)

In the Infrastructure Delivery Plan the problems of the capacity of the local wastewater network and treatment works are acknowledged and it is stated that occupation should be phased to align with delivery. Proceeding with this allocation without fixed, binding commitments from Southern Water for infrastructure delivery aligned with the pace of development risks increased emergency storm discharges into the globally protected habitats of the Chichester Harbour National Landscape.

This approach fails the test of being neither environmentally deliverable nor effective.

3 Unrealistic Delivery Trajectory and Viability Deficits (Unsound: Ineffective)

The Council relies on Southleigh to deliver a very large volume of housing completions during this plan

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period. However, the infrastructure requirements outlined above - including new link roads, dedicated utility upgrades, primary education facilities, and extensive acoustic and ecological buffering – will severely delay development viability.

Given the protracted lead-in times for a strategic site of this scale, the Council's trajectory is unrealistic. It will fail to deliver the expected five-year housing land supply, making the policy ineffective.

4 Environmental Degradation and Failure of the Mitigation Hierarchy (Unsound: Inconsistent with National Policy)

The Southleigh allocation site impacts sensitive natural ecosystems, including protected ancient woodland fragments and established wildlife corridors linking to Southleigh Forest.

In violation of NPPF Paragraph 193 (a) (December 2024), the Council has skipped the mandatory "avoidance" step of the mitigation hierarchy. The plan assumes that high urban housing densities can be placed directly adjacent to fragile ancient environments and bat- foraging corridors, deferring actual ecological protection to the master-planning or planning application stages.

Furthermore, the irreversible loss of this considerable landscape gap almost completely destroys the open rural setting that separates Denvilles, and Emsworth, resulting in unmitigated strategic coalescence.

Conclusion and formal request

For the reasons detailed above, the Southleigh Strategic Allocation fails the tests of being justified, effective, and consistent with National Policy.

Please set out the modification(s) you consider necessary to make the Local Plan legally c ompliant and sound, in respect of any legal compliance or soundness matters you have ide ntified above.
You will need to say why each modification will make the Local Plan legally compliant or so und. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Havant Local Plan sound, the Planning Inspector is respectfully requested to:

1. Halt or significantly reduce the capacity of the Southleigh Strategic Allocation until a comprehensive, cross-boundary cumulative Transport Assessment to include the monitoring of the impact on the existing highway network with and without the link road to the A27, is fully agreed upon.
2. Require an independent, transparent viability and infrastructure delivery audit to prove the site can realistically deliver its targets within the plan period.
3. Direct Havant Borough Council to secure enforcable, front-loaded infrastructure commitments from Southern Water before any allocations of this scale are formalised.

If you wish to upload any documents to support your representation, please do so below. Please note that there is a maximum file size of 50MB and you can upload a maximum of 1 0 files to include with your form.

No Response

Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consi der it necessary to participate in examination hearing session(s)?
Please note that while this will provide an initial indication of your wish to participate in exa mination hearing session(s), you may be asked at a later point to confirm your request to p articipate.
No details on the examination hearing session(s) have yet been determined and will be ma de available upon the submission of the Building a Better Future Plan to the Planning Inspe ctorate.

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.

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

Future Notification

Do you wish to be notified of any of the following milestones in the Building a Better Future Plan process?
These milestones include:

The Local Plan has been submitted for examination
The publication on the Inspector's Report
The adoption of the Local Plan

If you indicate that you wish to be notified, the email address you provided in Part A of the f orm will be used by the Council to notify you of these milestones.

Yes, I wish to be notified