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	Paul
Last Name	Jackson-Cole



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.
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 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	-
Allocation Number	2 (Land north of Long Copse Lane)
Paragraph Number	-
Page Number	PDF - page 99 - 101

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.

Allocation is not Justified
Allocation is not Effective

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.

Removal of Allocation 2 (Land north of Long Copse Lane) in its entirety

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.

- File: Representation in Opposition to Allocation 2.docx - Download

Examination Hearing Session Invitation

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

No, I do not wish to participate in examination hearing session(s)

Examination Hearing Session Invitation (2)

You indicated that you wish to participate in the examination hearing session(s). Please out line why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear th ose who have indicated that they wish to participate in examination hearing session(s). Yo u may be asked to confirm your wish to participate when the Inspector has identified the m atters and issues for examination.

No Response

Future Notification

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

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

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

Yes, I wish to be notified

Representation in Opposition to Allocation 2: Land North of Long Copse Lane

Havant Borough Council — Building a Better Future Plan, Local Plan 2025–2043

Regulation 19 Pre-Submission Consultation, July 2026

Name: Paul Jackson-Cole

[redacted]

Date: 08/09/2026

Professional background: I am a skilled transport professional with over 15 years' experience in the private and public sector providing input to the planning process assessing highways, transport and infrastructure impacts of mixed-use development. I work closely stakeholders and strategic development partners in progressing the delivery of regeneration and urban extension schemes to support local plan aspirations and infrastructure delivery.

Tests engaged: This representation is made on the grounds that the Plan is not **justified** and not **effective** in respect of Allocation 2.

1. Introduction

I objected to the allocation of this land in 2019 when it formed Policy H8 of the withdrawn Havant Borough Local Plan 2036. This representation updates those objections in light of evidence published since and addresses the current proposal for approximately 325 dwellings on 18.88 hectares comprising SHELAA sites EM01a/b and EM02a/b.

I acknowledge that both highway authorities raised no objection to the 2021 planning application. My case is not that development could never proceed. Rather, the Council's own evidence demonstrates that this is the least accessible allocation in the Plan, that the transport assessments relied upon address a materially smaller development than that now proposed, and that the mitigation relied upon by the Sustainability Appraisal has not been secured through policy.

2. First ground: The least accessible allocation in the Plan

The Strategic Transport Assessment (IT06, May 2026) records at paragraph 6.3.10 that the lowest average connectivity score is recorded at Long Copse Lane. Appendix C shows that the site performs worst for overall connectivity to public transport, health and leisure, and jointly worst for walking, education and shopping accessibility.

This is directly at odds with the Plan's transport vision which seeks to reduce reliance upon the private car. The site performs poorly against the measures most closely associated with sustainable travel while its strongest performance indicator is driving accessibility.

These findings reinforce concerns previously raised regarding the site's dependence on car travel and limited access to services, employment, healthcare, education and public transport.

The Highway Authority reached a similar conclusion during consideration of the 2021 application. Its consultation responses noted that most facilities exceed preferred walking distances, that Warblington School is some 3.6km away, that St James' Primary School lies close to the preferred maximum distance, and that local bus services are limited with stops approximately 750m from the site.

Notwithstanding these findings, the allocation received relatively little analytical attention within the Strategic Transport Assessment. Southleigh and Dunsbury Hill Farm receive detailed assessment, mapping and commentary, whereas Long Copse Lane receives only limited discussion despite recording the poorest connectivity score of any allocation.

The accessibility deficit is fundamentally linked to the location of the site. Distances to schools, shops, health facilities and public transport are fixed and cannot be resolved through highway engineering alone. This is therefore a site selection issue rather than a matter capable of resolution at application stage.

Criterion (s) relies on improved connections to LCWIP Routes 373, 270 and 277. However, none of these routes directly serve Long Copse Lane and the connecting sections required to create continuous access from the allocation have not been identified, assessed or costed. Furthermore, the Council's own evidence identifies delivery constraints affecting key sections of Routes 373 and 270.

The Sustainability Appraisal scores both EM01 and EM02 negatively in respect of accessibility to services and sustainable transport. Policy 1(e) seeks development where good accessibility exists or can realistically be achieved. The Council's own evidence calls into question whether that test is met.

This bears out what I said in 2019, and I repeat it:

> *Development in these locations would only promote out-commuting, high levels of car ownership and a reliance on the car to access employment and services adding high levels of traffic to already inadequate and restrained infrastructure.*
>
> *Access to services, retail, education, employment and sustainable travel is remote and limited with reduced passenger transport and oversubscribed health and education providers.*

3. Second ground: Evidence base assesses 260 dwellings, not 325

Every principal transport assessment relating to this allocation examines a scheme of approximately 260 dwellings rather than the 325 dwellings proposed through Regulation 19.

The Strategic Transport Assessment confirms that modelling was undertaken using the Regulation 18 version of the Plan. The increase of 65 dwellings was introduced later.

The Council's response is that additional development at Long Copse Lane is offset by reductions elsewhere in the Borough and therefore represents a worst-case scenario overall. However, the sites removed are located on different parts of the network and do not relate to the roads serving Long Copse Lane. At the location where impacts arise, the evidence assesses substantially fewer dwellings than those now allocated.

The same issue applies throughout the evidence base. Connectivity scores, trip generation, junction assessment and highway impacts are all based on the smaller scheme.

The Highway Authority's agreed trip generation figures indicate peak traffic levels would more than triple compared with recorded baseline flows even before accounting for the increase to 325 dwellings.

West Sussex County Council similarly assessed junction performance and lane operation on the basis of lower traffic forecasts. Those assumptions have not been revisited.

The Strategic Transport Assessment further confirms that individual effects arising from Long Copse Lane cannot be isolated through the strategic transport model because only Southleigh and Dunsbury Hill Farm are represented by individual zones.

Accordingly, the Inspector is being asked to consider an allocation for which there is no site-specific transport assessment based upon the scale of development actually proposed.

4. Third ground: Mitigation has not been secured through Policy

Appendix E of the Sustainability Appraisal identifies mitigation that underpins its assessment of the site, including enhanced walking and cycling connections, improved public transport provision and agreed sustainable transport measures.

However, these measures have not been translated into mandatory policy requirements. Instead, the allocation generally refers to exploring opportunities or maximising opportunities.

My argument is not that contributions could not be secured through conditions or obligations. It is that the Sustainability Appraisal accepted the site's significant accessibility shortcomings on the basis that mitigation would be required, whereas the policy itself stops short of requiring that outcome.

The soundness of the allocation therefore depends upon assumptions which have not been carried through into the Plan.

The contrast with Allocation 1 at Southleigh is instructive. There, transport requirements are clearly expressed as mandatory obligations supported by specific wording and detailed requirements. No equivalent approach has been applied to Long Copse Lane.

5. The character of Long Copse Lane

I said the following in 2019, and it holds:

> *The Lane currently enjoys very light traffic levels, reflected in the high levels of use and enjoyment appreciated by many walkers, cyclists and equestrians on a daily basis, including those walking and cycling to Westbourne Primary School.*

The Highway Authority's own survey data bears out the description. Automatic traffic counts undertaken in 2018 recorded 50 two-way movements in the morning peak hour and 60 in the evening peak, and approximately 682 two-way movements a day.

Hampshire County Council would require design standards to be met for a route accommodating the level of movement proposed — typically a 5.5m street lit carriageway with central white line markings and standard kerb edges, with a minimum 1.8m footway as indicated by the Highway Authority itself: its response of 15 July 2022 refers to the proposed improvements to Long Copse Lane to widen the existing carriageway to 5.5m, and its response of 18 November 2021 to a 1.8m footway around the bend into Hollybank Lane.

The adherence of highway design standards including lining, signing and illumination to an historic, lightly trafficked and soft-edged lane would materially alter the character and appearance of the Lane through an urbanisation effect.

These interventions would materially alter the rural and informal character of the lane through urbanisation.

The Council's own Kirkham Landscape Sensitivity and Capacity Study (2015) identified the parcel as having low capacity for development and recommended that it should not be taken forward for growth.

6. Highway drainage and maintenance

The very low levels of highway and drainage maintenance currently evidenced on the Lane — drain gullies regularly overflowing, carriageway edges breaking up, potholes and drainage issues — indicate that Long Copse Lane, an unclassified route, is and will remain a low priority for programmed highway maintenance when compared with more heavily trafficked routes in the locality.

Low levels of maintenance would mean irregular clearance of culvert inflows and outflows. Given the heavy leaf fall and the high level of run-off from adjacent ground, this could result in significant surface water drainage problems, particularly towards the eastern end of the Lane at the Hampshire and West Sussex boundary, which is regularly affected by surface water run-off, with potential effects on the quality and diversity of the River Ems into which much of that water drains.

Criterion (i) of the allocation requires surface water systems restricting runoff to greenfield rates. That is a requirement in respect of the site. It says nothing about the highway drainage on the Lane, which is the subject of this section. I note that drawing ITB13525-GA-101 asserts that a drainage solution has been agreed between Highways, Flood and Water Management and previous land promoters, without showing what that solution is, and I ask that it be put on the record.

7. The western and eastern sections of the Lane

These matters were set out in my 2019 statement and are restated here because they bear on the reliability of the assessments discussed at section 3 above.

To the west. Road widening at the western extent of the Lane would rely on third party land. Culverting of the ditches would require landowner consent, since drainage ditches adjacent to highways are commonly outside the highway boundary and maintained by the adjacent landowner rather than at public expense. There is a significant narrowing immediately south of the bend into Hollybank Lane, with third party land constraining the ability to widen to an adequate standard, and there are significant differences in highway levels and those of immediately adjacent private drives and gardens, such that widening would be likely to increase gradients to drives that are already steep.

The Highway Authority has acknowledged this constraint in terms. In its response of 18 November 2021 it explained that the proposed footway and cycleway were routed within the site because the above route prevents the need for additional highway land to be reclaimed from the southern side of Long Copse Lane across the site frontage. The constraint is therefore not disputed; it has been designed around, and only across the frontage the promoter controls and does not address the boundary constraints at the immediate north of Hollybank Lane.

To the east. Census journey-to-work data indicates that in the order of 35 to 40 per cent of peak hour journey-to-work trips from this locality would travel east towards Chichester and beyond. I note that the Council's own Strategic Transport Assessment relies on 2011 Census commuter flows for the same purpose, stating at paragraphs 4.3.1 and 4.3.4 that the 2021 Census is not representative of current travel patterns, particularly in relation to commuter travel.

Given the constraints through Westbourne village centre, it is not realistic to suggest that vehicles from this allocation would not choose to travel east along Long Copse Lane towards North Street as a quicker and more direct route to the east and north east (as local residents currently do). West Sussex County Council's own response confirms the routing assumption, recording that all trips to Chichester district including Westbourne (and other locations in West Sussex) are routed along Long Copse Lane to the east of the site and as such the assignment is acceptable.

There is no scope within the highway boundary to widen the Lane to the east, nor to provide any form of pedestrian footway. Significant lengths of the route lack sufficient width for two vehicles to pass safely, and it is not uncommon for vehicles to pull over or reverse considerable distances to allow passing or to allow safe passage for non-motorised users. The radius bend near the county boundary has negligible forward visibility, and the carriageway immediately entering and exiting the bend is too narrow for two vehicles to pass.

West Sussex County Council raised no objection to the 2021 application, and I do not suggest otherwise. It did, however, record that the increase in vehicles may have a negative effect on the perception of safety for Non Motorised users of the lane. The harm to walkers, cyclists and riders is therefore acknowledged by the highway authority; it was simply not, at 210 dwellings, sufficient to found an objection.

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9. Modification sought

Deletion of Allocation 2 (Land north of Long Copse Lane) from the Plan, with consequential amendment of Policy 6, the housing trajectory at Appendix 1, and the Policies Map.

For the reasons set out above, the allocation is not justified: it is the least accessible site the Council has allocated on its own transport evidence, and that evidence assesses a smaller quantum of development than the Plan proposes. Nor is it effective: the mitigation on which the Sustainability Appraisal's conclusion depended has not been secured by the allocation, and the Strategic Transport Assessment confirms that no contribution towards mitigation can be attributed to this site.

Paul Jackson-Cole

08/09/2026
