

Dear Mr Young,

I am writing to formally object to the outline planning application submitted by Bloor Homes for the Southleigh development, under reference APP/265/00324. As a local resident, I believe development of this scale will cause irreversible harm to our community and environment. I urge the committee to refuse this application because the proposal conflicts with a number of important policies within the National Planning Policy Framework (NPPF), and because the application has not demonstrated that its significant adverse impacts can be satisfactorily mitigated.

• **Severe Impact on Highway Safety and Traffic (NPPF Paragraphs 115(d), 116 and 118):** Lacking a direct link road to the A27, commuter traffic from 1,800 homes risks overwhelming local roads through Denvilles and Emsworth. The Transport Assessment relies upon baseline modelling which does not adequately reflect heavy commercial van traffic associated with the nearby Amazon delivery station or the cumulative effect of four other committed local developments feeding into the same network. It therefore fails to demonstrate that significant impacts on network capacity and congestion can be mitigated to an acceptable degree, or that the residual cumulative impacts will not be severe when all reasonable future scenarios are taken into account. Paragraph 116 specifically provides that development should be refused on highways grounds where residual cumulative impacts, following mitigation, would be severe.

• **Failure to Provide Sustainable Transport (NPPF Paragraphs 109(e), 110, 115(a) and 117(a)):** The removal of the previously proposed active-travel pedestrian and cycle bridge materially weakens the sustainable transport strategy for the development. The NPPF requires significant development to be located where it is, or can be made, sustainable through a genuine choice of transport modes, and requires development proposals to prioritise sustainable transport and give first priority to pedestrian and cycle movements. Removing a significant connection without demonstrating an equivalent alternative risks reinforcing rather than reducing dependence on private vehicles.

• **Warblington Level Crossing Congestion (NPPF Paragraphs 115(d), 116, 117(d) and 118):** Southleigh Road is already severely constrained by traffic queues associated with Warblington level crossing. The West Coastway line carries frequent stopping and through-rail traffic, resulting in significant periods during which the crossing is closed. Directing substantial additional development traffic onto this existing bottleneck risks severe additional congestion, including impacts upon service and emergency vehicle access. The Transport Assessment must demonstrate that this existing constraint, together with cumulative future traffic, can be satisfactorily accommodated. The application has not demonstrated that this can be achieved.

• **Heightened Flood Risk and Deficient Drainage (NPPF Paragraphs 170, 181 and 182):** Replacing substantial areas of presently permeable agricultural land with buildings, roads and hard surfaces will fundamentally alter the drainage characteristics of the site and increase the need for effective surface-water management. The surrounding area is already vulnerable to flooding and the application fails to

demonstrate convincingly that development will not increase flood risk elsewhere. The NPPF specifically requires flood risk not to be increased elsewhere and requires development affecting drainage to incorporate sustainable drainage systems capable of controlling flow rates and reducing runoff volumes, together with suitable operational standards and lifetime maintenance arrangements.

• **Ecological Damage and Loss of Biodiversity (NPPF Paragraphs 187(d) and 193):**

The site supports an established network of mature trees, hedgerows, wildlife habitats and ecological corridors. Development on this scale risks substantial habitat loss and fragmentation. NPPF paragraph 187 requires development to minimise impacts upon biodiversity and provide net gains, while paragraph 193 establishes a clear mitigation hierarchy: where significant biodiversity harm cannot first be avoided, then adequately mitigated and, only as a last resort, compensated for, planning permission should be refused. The statutory requirement for 10% Biodiversity Net Gain should not be treated as justification for otherwise avoidable destruction of existing established habitats.

• **Loss of Strategic Gap and Coalescence (Conflict with Adopted Core Strategy Policy CS11.9, Adopted Allocations Plan Policy AL2 and NPPF Paragraphs 48, 135(c), 135(d) and 187(b)):** The Southleigh land forms part of the identified undeveloped gap between Havant and Emsworth. Adopted Core Strategy Policy CS11.9 expressly requires the undeveloped gap between Emsworth/Havant to be maintained, while adopted Allocations Plan Policy AL2 requires development within the gap to help define the separate identity of settlements and prevent their coalescence. The Council's own landscape evidence has also identified Southleigh land as forming part of the Havant-Emsworth Gap. Development of approximately 1,800 homes would fundamentally alter this presently undeveloped separation, substantially eroding the physical and visual distinction between Havant/Denvilles and Emsworth. This conflicts with the adopted development plan and with the NPPF requirement for development to be sympathetic to landscape setting, maintain a strong sense of place and recognise the intrinsic character and beauty of the countryside. NPPF paragraph 48 is particularly relevant, as it confirms that planning applications must be determined in accordance with the adopted development plan unless material considerations indicate otherwise.

• **Severe Infrastructure Deficiencies (NPPF Paragraphs 98, 100 and 101):** Local healthcare, education and other community infrastructure is already under significant pressure. Development of approximately 1,800 homes will inevitably generate substantial additional demand. The NPPF requires planning decisions to plan positively for community facilities and services, places great weight upon ensuring sufficient education provision for existing and new communities, and requires significant weight to be placed upon the importance of new, expanded or upgraded public-service infrastructure, including healthcare. References to possible future facilities are not the same as secured provision. Necessary infrastructure should therefore be demonstrably funded, secured and appropriately phased alongside occupation of the development.

• **Unacceptable Construction Disruption (NPPF Paragraphs 117(c), 187(e), 198 and 199):** Construction of development on this scale will result in prolonged movements of heavy construction vehicles through and adjacent to established residential areas.

Without a demonstrably safe and deliverable construction access strategy, this presents risks to pedestrians, cyclists and other road users and potentially exposes existing residents to prolonged noise, vibration and air-quality impacts. The NPPF requires development to minimise conflicts between pedestrians, cyclists and vehicles and requires the cumulative effects of pollution upon health and living conditions to be considered and appropriately mitigated.

Taken together, these issues call into question whether the proposal represents sustainable development when considered against the NPPF as a whole. Sustainable development requires economic, social and environmental objectives to be pursued in mutually supportive ways, including the coordination of infrastructure, support for healthy communities and protection and enhancement of the natural environment. For these reasons, I strongly request that Havant Borough Council refuses planning permission for this development.

Please keep me informed of any updates or committee meeting dates.

Yours sincerely,

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