

Dear Planning Officer

Having reviewed the Southleigh application in greater detail against the Emsworth Neighbourhood Plan and the applicant's own supporting evidence, I wish to add the following matters to my objection.

1. Compliance with the Emsworth Neighbourhood Plan

The southeastern part of the Southleigh development falls within the Emsworth Neighbourhood Plan area. The applicant itself identifies a number of relevant Neighbourhood Plan policies, including policies relating to landscape, infrastructure, housing and design.

The application should therefore be assessed carefully against the Neighbourhood Plan as part of the statutory Development Plan rather than considering Southleigh principally through the lens of housing delivery.

Of particular relevance are policies C3, L1, L2, H1 and D1–D7. The scale and nature of the proposed development raise legitimate questions over whether the scheme fully complies with the objectives and requirements of these policies.

2. Landscape Character and Settlement Identity

Southleigh represents a major and permanent transformation of currently open land between Havant/Denvilles and Emsworth.

Although substantial green infrastructure and landscaping are proposed, landscaping cannot entirely mitigate the fundamental change from open countryside to an urban development of approximately 1,800 homes.

The key issue is therefore not simply whether sufficient landscaping is proposed, but whether the development would preserve the distinctive landscape setting and separate identity of Emsworth over the long term.

3. Infrastructure Must Accompany Development

The applicant's own Flood Risk Assessment records the Neighbourhood Plan expectation that new residential development should be supported by an appropriate level of essential infrastructure, including education, flood defence and drainage, healthcare, transport, broadband, social services and employment opportunities.

With a development of approximately 1,800 homes, it is therefore essential that the Council is satisfied that this infrastructure is not merely proposed in principle but is appropriately funded, secured and phased alongside occupation.

Permission should not create a situation where housing is delivered significantly ahead of the infrastructure required to support it.

4. Transport and Sustainable Travel

The applicant proposes active-travel routes, public-transport improvements and other measures intended to reduce reliance on private vehicles.

These are positive elements of the scheme. However, the applicant's Environmental Statement also identifies residual adverse effects relating to matters including severance and driver delay.

The Council should therefore carefully test the assumptions underlying predicted modal shift and determine whether the proposed transport mitigation will realistically prevent additional pressure on Emsworth, the A259 and surrounding roads.

5. Emsworth Town Centre

The proposed development includes its own Local Centre.

The Emsworth Neighbourhood Plan and subsequent Town Partnership work place considerable importance on strengthening Emsworth town centre, increasing footfall, supporting independent businesses, improving the public realm and maintaining Emsworth as an attractive place in which to visit and spend time.

The Council should therefore be satisfied that the new Local Centre will complement rather than compete with Emsworth and that the cumulative economic implications for the existing town centre have been properly assessed.

6. Outline Permission and Reliance on Future Mitigation

A recurring concern across a development of this scale is the extent to which important details will be determined through subsequent reserved-matters applications, conditions, management plans and other future approvals.

Where the acceptability of the development depends upon landscape buffers, sustainable transport, drainage, ecological mitigation or infrastructure delivery, these measures need to be sufficiently certain and enforceable at the outline planning stage.

The Council should avoid granting outline permission on the assumption that significant impacts can necessarily be resolved at a later stage.

7. Cumulative Impact

The impacts of Southleigh should also be considered cumulatively rather than individually.

The combined effects of approximately 1,800 additional homes on:

- * traffic and highway capacity;
- * healthcare;
- * schools;
- * drainage and flood resilience;
- * landscape character;
- * biodiversity;
- * existing infrastructure;
- * Emsworth town centre; and
- * the identity and character of Emsworth

could be substantially greater than consideration of each issue separately suggests.

Conclusion

I recognise that the proposal contains potential benefits, including new housing, affordable housing, community facilities, a primary school, green infrastructure and active-travel provision.

My objection is therefore not based upon opposition to development in principle.

My concern is whether this development, at this scale, in this location and with the mitigation currently proposed, represents sustainable development when considered against the Development Plan as a whole and the community-led vision established through the Emsworth Neighbourhood Plan.

Before determining the application, I respectfully request that Havant Borough Council demonstrates clearly:

1. how the proposal complies with the relevant Emsworth Neighbourhood Plan policies, particularly C3, L1, L2, H1 and D1–D7; 2. how the separate identity and landscape setting of Emsworth will be protected; 3. how essential infrastructure will be funded, secured and delivered alongside housing; 4. how the predicted modal shift and transport mitigation will be achieved in practice; 5. how the vitality and viability of Emsworth town centre will be protected; 6. how cumulative impacts have been assessed; and 7. which mitigation measures will be legally secured at outline stage rather than deferred to future applications.

Until these matters have been satisfactorily demonstrated, I do not consider that the Council has sufficient evidence to conclude that the proposal accords with the Development Plan when considered as a whole.

Regards

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