



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Michelle Berrington (Head of Planning & Development)
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National Highways
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To: Havant Borough Council

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: APP/21/01434

Location: Rook Farm, land off St Marys Road, Hayling Island

Proposal: Outline application for development of up to 300 dwellings (including affordable housing). The proposal includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement.

National Highways Ref: NH/24/04760

Referring to the consultation on a planning application dated 25 January 2022 referenced above, in the vicinity of the A27 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningse@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:		Date: 11 June 2025		
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Patrick Blake</td><td style="width: 50%; vertical-align: top;">Position: Spatial Planner Area 3 National Highways planningSE@nationalhighways.co.uk</td></tr></table> National Highways Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ Patrick.Blake@nationalhighways.co.uk			Name: Patrick Blake	Position: Spatial Planner Area 3 National Highways planningSE@nationalhighways.co.uk
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¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In case of this development proposal, our interest is in the A27, in particular the A27/Langstone Road/Park Road South junction.

We initially responded on 15th February 2022 and have continued to provide updated responses with the most recent being 14 March 2025.

We have held meetings with the applicant's transport consultant (Prime Transport Planning) where we discussed the impact assessment, further modelling alongside any other assessment that may be required. We have continued to have dialogue with the applicant regarding traffic modelling which will be used to inform an updated Transport Assessment. We are currently awaiting an updated PARAMICS model for us to review.

It is understood that the same modelling that is referred to above is being relied upon by applications APP/22/0001, APP/21/01351 and APP/21/01350.

Recommendation

To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice:

We recommend that the Local Planning Authority does not grant planning permission for this application (Ref: APP/21/01434) until 3 September 2025 to allow National Highways to review this information, so we can provide the Local Planning Authority with fully informed advice. This does not prevent the authority, if they so wish, to either refuse the application or agree an extension of time beyond 3 September 2025.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.