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Date	20 November 2025	Email	havantdc@hants.gov.uk

For attention of Ms Miszewska

Dear Arleta

**Re: APP/23/00471 At Land of North of Fire Station (Blue Star Land),
Waterlooville**

Outline planning application for a residential development of up to 69 dwellings with access from Laxton Leaze and emergency access from Ellisons Crescent and all other matters reserved.

Thank you for your re-consultation on the above outline planning application. In response to previous comments dated 15 April 2025 the applicant has submitted a revised covering letter and supporting drawings which the Highway Authority have reviewed and have the following comments to make.

Walking and Cycling

In response to previous comments raised by the Highway Authority the WCHAR has been updated to incorporate a Healthy Streets Assessment. Whilst reference throughout the WCHAR is made to relevant healthy streets indicators, the assessment is incomplete and does not provide the relevant scoring mechanisms for the existing infrastructure subject to the audit process. It is unclear what implications improvements along the routes audited would have to increase the healthy streets score. The Highway Authority are therefore unable to corroborate the assessment work undertaken in accordance with this guidance.

The Highway Authority remain concerned with the quality of the WCHAR undertaken and the level of opportunities for improvements identified when there are clear deficits in the infrastructure present. Comments provided within the previous formal response on the quality of the assessment work therefore still stand. Notwithstanding this, the Highway Authority through their own

Deputy Chief Executive and Director of Hampshire 2050
Gary Westbrook

assessment work have identified deficits in the existing infrastructure that would benefit from improvements and therefore it is considered that no further amendments need to be made to the WCHAR.

These sustainable transport improvements identified have been set out within both previous responses but are however reiterated below for clarity:

1. Widening of and kerbing amendments for the existing connection between Laxton Leaze and Plant Farm Crescent to cater for cyclists
2. Financial contribution towards delivery of the Southern Brambles Link
3. Financial contribution towards delivery of the parallel crossing along Houghton Avenue
4. Financial contribution towards pedestrian and cycle improvements at the Forest End roundabout as identified on the Havant LCWIP
5. Delivery of wayfinding strategy towards key facilities and destinations
6. Provision of RTI information at the Victoria Road bus stops

The covering letter submitted by the applicant dated 12 September 2025 suggests that item(s) 2-4 and 6 fail to meet the 3 tests of CIL and offer a contribution towards items 1 and 5, albeit no figure has been provided.

The Highway Authority consider that given item 1 is related to on-site works, this should be delivered directly by the applicant. This deficit was identified on a site visit with the master developer in April 2024 and it was agreed at this time that this would be rectified and delivered by Grainger directly given this is an on-site deficit. As requested within the initial response dated 13 November 2024, a drawing has not been provided outlining the scope of these works to be secured for delivery.

This leaves a proportionate contribution towards a wayfinding strategy. Wayfinding in isolation would be insufficient to encourage the levels of sustainable uptake required if the infrastructure required for use is incomplete, substandard, not safe and suitable for use or requires significant travel against desire lines. The Highway Authority remain of the view that items 2-4 and 6 set out above are directly related to the development for the following reasons.

Southern Brambles Link:

Delivery of the southern brambles link will significantly reduce walking distances and provide connectivity between Houghton Avenue and Elettra Avenue which offers suitable employment and leisure opportunities for future residents. The route in the absence of this link being delivered is highly trafficked and unattractive for use by sustainable modes, encouraging uptake of the private car. This therefore does not comply with the NPPF and LTP4. As set out previously, the scheme was identified in the outline s106 for the Berewood MDA and is currently at the feasibility stage. This has outlined a cost for delivery of c. £700,000 and there is currently a funding shortfall to deliver this key link.

Houghton Avenue Parallel Crossing:

Delivery of the parallel crossing will provide controlled crossing facilities to

replace the existing uncontrolled provision improving the safety for pedestrians and cyclists at main MDA access point which is subject to high traffic volumes particularly in the AM, PM and school peak periods. Provision of the crossing point will also improve connectivity for future residents accessing the Brambles Industrial site including utilising the Southern Brambles Link as this comes forward. The need for the delivery of improved crossing provision in this location has been identified within the outline s106 agreement for the Berewood MDA. The scheme has been costed at c. £490,000 for delivery and there is currently a funding shortfall to deliver this key crossing point.

Pedestrian and Cycle Improvements at the Forest End Roundabout as identified on the Havant LCWIP:

As set out previously scheme is emerging to improve the cycle and pedestrian connectivity and bus access around the Forest End roundabout and the A3 London Road. This would improve sustainable access into Waterlooville Town Centre as well as improving connectivity to access the on-carriageway cycle infrastructure traveling south on the A3 towards Portsmouth. Whilst this is appreciated it forms one of many routes into the town centre, the route audited by the applicant through the WCHAR does not fall under the ownership of the Highway Authority in the most part and therefore no improvements to the deficits identified can be sought. Furthermore, the route audited is subject to steps and therefore not suitable for use by cyclists or those with reduced mobility or pushchair users. Study work is currently ongoing however it is understood that there is a shortfall in funding for the delivery of the scheme.

RTI Provision at Victoria Road bus stops:

The northbound stop consists of a flagpole and limited timetable information only, with the westbound bus stop subject to a shelter. Both stops would benefit from the provision of RTI timetable provision. Given the proximity of the bus stops from the site and the frequency of the services, there is a real opportunity to encourage travel via bus for future residents. Whilst a bus service runs through Berewood itself, the onward routing and regularity of the service may not adequately serve some residents and therefore the availability of services at the Victoria Road bus stops may be more utilised.

Summary:

In summary, the Highway Authority consider there to be appropriate justification outlining the CIL Reg 122 compliance of the scope of the contribution request from the site to provide realistic opportunities for sustainable transport uptake and reduce private car reliance. Given the position of the applicant, the Highway Authority do not consider that the site complies with the NPPF and LTP4.

Public Rights of Way (PRoW)

In principle agreement has been provided on the site walkover in April 2024 on the diversion of footpath 108/11/1. The applicant confirms within the covering letter that the diversion of footpath 108/11/1 is to be provided as close to the existing route as possible. It was also discussed on-site in April 2024 on the diversion for the PRoW onto the shared-use provision proposed

to run through the centre of the site. This would require upgrading of part of the route to bridleway status to accommodate cycling. The formal diversion of footpath 108/11/1 to facilitate the development proposals and upgrade to bridleway status, under the provisions of the Town and Country Planning Act 1990 or Highways Act 1980 would be suitably obligated through any s106 agreement.

Stage One Road Safety Audit (RSA1)

The applicant has undertaken a Stage One Road Safety Audit (RSA1) for both access arrangements supported by a designer's response dated July 2025. The RSA1 raised 2 issues (3.1 and 3.2) relating to the access arrangement from Laxton Leaze only.

Item 3.1 of the RSA1 raises concern that the segregated provision does not accord with LTN 1/20. This audit item is not agreed given that it has not been intended for this to provide a two-way cycle lane provision. The Highway Authority consider that the width of the cycle path (2.5m) accords with minimum widths for a single way cycle track as set out within LTN 1/20. It is considered that this provides an appropriate betterment above the existing shared use provision. Appropriate signage can be considered through the s278 detailed design stage.

The Highway Authority are unclear on audit item 3.2. It is assumed that this relates to the fact that further details have not been submitted on the internal layout. It is noted that this is however an outline planning application, and these details would be agreed and provided at the reserved matters stage.

It is noted that no safety issues were raised on the interaction of the access arrangement with Peasgood Lane. Regardless, the Highway Authority consider that the provisions of the access arrangement introduce conflict into the design for pedestrians/cyclists and vehicle users given the design of the access should a modal filter not be presented to support this planning application. This is discussed further within this response.

Site Access(es)

The revised access arrangement is shown within drawing GTWVILLE_BSL/SK/02 Rev R which the Highway Authority have reviewed and have the following comments to make.

A 5.0m carriageway internally was previously proposed to comply with the HCC TG2 requirements. It is noted that the subsequent drawing revision increases the width to 5.5m (which appears consistent with that provided along Laxton Leaze) but however reduces to 4.88m further within the site. This is substandard and does not accord with TG2. The Highway Authority are concerned that in the absence of suitable swept path analysis it is unclear whether this will operate in a safe and suitable manner.

Given the applicant remains minded to provide a modal filter at Peasgood Lane to support the planning application, the Highway Authority remain

concerned with the poor design of the segregated shared use connection particularly where cyclists are expected to access and egress this facility. The provision of the modal filter would prove better opportunities to integrate cyclists at the access arrangement. The drawing confirms that the proposed ramp at the raised table is to comply with HCC standard details and specific details can be agreed through the s38 detailed design stage.

The service margin provided has been confirmed to measure 0.5m and to be constructed of hard standing. This is considered acceptable.

The sign positioned in the segregated route may need to be moved to avoid conflict with the handlebars of cyclists. Furthermore, appropriate signage should be provided to direct cyclists off the carriageway onto the segregated route. Details surrounding this signage provision can be agreed through the s38 detailed design stage.

Reference to the vehicle crossover arrangement on the southern side of the access point has since been omitted from the access drawings due to uncertainties on the positioning of the access arrangement. The Highway Authority are content with this approach and satisfied that any additional access arrangement within the site could be detailed as part of any future reserved matters application.

In terms of interaction with the proposed culvert, it is noted that the LLFA have provided no objections to this application and therefore the Highway Authority have no further comments to make on this matter at this stage.

Visibility:

Visibility splays at the proposed site access are demonstrated within drawing GTWVILLE_BSL/SK/020 Rev R.

Vehicular visibility splays provided at Peasgood Lane given the need for a modal filter as discussed further below will not be required. Notwithstanding this, cycle visibility splays should be provided given that this route could be utilised by bicycles. This matter remains outstanding.

The cycle visibility splays where the off-carriageway infrastructure is proposed to join Laxton Leaze whilst based on a 20mph design speed require refinement and should also be revised once the design of the segregated shared use facilities is agreed. The position of the splay assumes cycles will be travelling tight to the edge of the cycle path to the north when egressing the cycle provision which is unlikely to occur in practice. It is considered cyclists would assume a more central position and this should be reflected on any updated drawings.

2.0m x 2.0m pedestrian intervisibility splays have been provided at the vehicle crossover arrangement for Peasgood Lane. These will not be required at Peasgood Lane with the implementation of a modal filter however for the current arrangement appropriate visibility can be achieved.

Refuse and Servicing Arrangements:

Drawing GTWVILLE/BSL/VT/01 Rev G outlines revised swept path analysis. Tracking speeds have been confirmed to be undertaken at 10mph.

The drawing continues to outline tracking movements for vehicles utilising Peasgood Lane to access the proposed development which evidences that the movements cannot be accommodated appropriately and could lead to conflicts between pedestrians, cyclists and other vehicle users. The Highway Authority remain of the view that Peasgood Lane is not suitable to form part of the access arrangement into the site, and the provision of the modal filter is discussed further below.

The drawing however includes further scenarios for vehicles accessing the site via Laxton Leaze only for an 11.20m 'super large' refuse vehicle only which outlines all possible manoeuvres. Whilst the refuse is shown to pass a car for a certain extent, this has not been evidenced for the full length of Laxton Leaze and into the site access itself. Notwithstanding this, given the alignment of Laxton Leaze into the site this is likely to be achievable and therefore no further swept path analysis is considered necessary to be provided in this instance.

Tracking has been updated to outline movements for a fire tender at the Laxton Leaze/Laxton Leaze junction but like the refuse vehicle, this does not extend within the site itself. It is noted that the fire tender subject to the tracking exercise does not comply with the HCC standards (8.10m x 2.55m). Notwithstanding this, given the refuse vehicle is the correct size and outlines where a car can pass at this junction, the fire tender tracking does not need to be updated.

Drawing GTWVILLE_BSL/VT/03 Rev B outlines tracking for a 4.6t panel van passing a car for the full length of Laxton Leaze up to and including the Laxton Leaze/Grainger Street Junction. It is noted that the car tracked does not accord with the dimensions set out within TG2 (4.80m x 2.0m). The drawing identifies some slight conflicts between the vehicles when the delivery vehicle turns left and right into Laxton Leaze on both occasions. The Highway Authority did not consider this scope to be necessary given this is an existing development constructed to HCC adoptable standards. Whilst conflicts are shown the Highway Authority are content that this is an existing arrangement which is unlikely to become a safety issue with the additional quantum of development proposed. The Highway Authority are content that these vehicles can occur simultaneously when accessing the site itself.

Peasgood Lane Modal Filter:

The necessity behind the provision of a modal filter at Peasgood Lane has been set out within the initial formal response on the application dated 13 November 2024 to address the safety issue with use of Peasgood Lane to access the development site. The applicant remains to be prepared to pursue delivery of a modal filter and instead suggests a signage strategy secured

through condition to warn vehicular users to not utilise Peasgood Lane. This is not considered a suitable alternative approach given that this could not physically prohibit vehicular use in this location.

Since issuing of the previous formal response engagement has been undertaken with the Refuse Authority. The refuse operator has confirmed they are content to consider alternative routing strategies such as using Denniston Dene to support delivery of a modal filter.

The updated tracking provided by the applicant within drawing GTWVILLE_BSL/VT/01 Rev E continues to outline that vehicle movements cannot be achieved in a safe and suitable manner when utilising Peasgood Lane to access and egress the proposed development. The modal filter would therefore prevent these movements from occurring and allow for better integration for cyclists to access Laxton Leaze from the segregated shared use provision. This provision will allow for greater width to be available to allow for the segregated shared use facilities to be extended up to this point with cyclists to drop on carriageway with a greater landowner.

In the absence of measures to physically prohibit vehicular use via Peasgood Lane, such as a modal filter being delivered, the Highway Authority do not consider that the site can be accessed in a safe and suitable manner for all users and therefore does not comply with paragraph 116 of the NPPF.

Emergency Access Visibility:

Visibility splays to the south along Ellisons Crescent has now been identified on drawing GTWVILLE_BSL/SK/03 Rev D. The full length of the splay to the south has been confirmed which will aid in identifying the extent of Peasgood Lane that should be subject to a TRO. As previously requested, given the emergency access is also to be used by cyclists, cycle visibility splays should be demonstrated in accordance with HCC TG3 and LTN1/20. This remains outstanding.

A TRO is considered necessary to be secured to ensure that the emergency access is not blocked by errant parking observed along Peasgood Lane and that the visibility splays remain free of obstruction. Currently the land is not within the applicant or the Highway Authorities gift to deliver and therefore there are concerns on the ability of the splays to remain clear in the absence of successful implementation of a TRO.

Trip Generation – Vision Led Approach

Within the covering letter the applicant provides justification as to why the 31% target modal share of sustainable modes is reasonable in line with the vision-led approach. It is reiterated that this is a 10% increase based on the current modal share which has been taken from the Berewood MDA Year 4 monitoring report.

The Highway Authority previously raised that a 10% reduction from the baseline private car trips was not ambitious enough. The applicant sets out

that the Berewood Travel Plan has only achieved a sustainable transport mode share of 6% over a 4-year period. It is noted that this is likely to be low as the package of sustainable transport infrastructure committed to support the outline Berewood MDA is yet to be fully delivered. Notwithstanding this, the 10% increase does appear reasonable in the context of this site with the applicant correctly stating that this falls within the 30-40% parameters set out within the initial response dated 13 November 2024.

Whilst the Highway Authority are minded to agree this target mode share, in this instance, it is unclear how this would be achieved given the lack of sustainable transport infrastructure proposed to support this development. It is unclear how a travel plan, a minor on-site improvement and wayfinding provision will achieve the target 10% given the achieve modal share of the wider Berewood MDA over the monitoring period.

Traffic Distribution/Assignment

As set out previously 10% of development trips are proposed to travel towards the Ladybridge Roundabout. The applicant has undertaken a percentage impact assessment and suggests that the requirement to restrict occupations until the Berewood Southern Access works have been implemented is not reasonable given the less than 1% increase in movements during the peak hours. The Highway Authority do not agree with this narrative.

Whilst it is appreciated this is a limited impact, given the sensitivities of this junction any additional trips above that assessed as part of the s106 DoV for the Berewood MDA can have severe implications on the operation of the existing layout. The junction was found to be sensitive and any additional trips above that assessed would impede the ability for the junction to operate in a safe and suitable manner.

The Highway Authority remain of the view that should any future planning consent be granted the Southern Access will need to be in place prior to the occupation of any additional development, which should be covered by an appropriately worded planning condition. Given the status of the southern access and associated revised triggers associated with the wider MDA site regarding occupations, it would be inappropriate to enable further occupations above that agreed within the s106 DoV given the reliance on the Southern Access for this development distribution. This would be a consistent approach applied with any major development in the area with a reliance on the Southern Access junction for distribution purposes.

Travel Plan

The technical elements of the travel plan were previously agreed with the Highway Authority with a formal response dated 13 November 2024. However, given the off-site mitigation package has not been agreed, and reference is required to be included within the travel plan to encourage the levels of modal shift required, the travel plan is not considered suitable to support the development to meet the vision-led targets presented.

Recommendations

Having regard to the above, the latest information submitted by the applicant has not sufficiently addressed concerns raised on the safe and suitability of the access arrangement. Furthermore, the package of works proposed by the applicant is not considered to appropriately mitigate the development, nor provide realistic opportunities for sustainable transport uptake.

The Highway Authority therefore recommend refusal on the following grounds:

1. Access:
In the opinion of the Highway Authority, the proposals involve access arrangement(s) into the site that cannot be reconciled with the National Planning Policy Framework in that the access arrangement into the site would cause highway safety issues contrary to National Planning Policy Framework 116
2. Sustainable Transport Opportunities:
In the opinion of the Highway Authority, the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that it would result in users of the development being unable to make use of sustainable transport opportunities. This would result in an overreliance on the private car which is contrary to NPPF paragraph(s) 109, 111, 115, 117, and Hampshire County Council's LTP4
3. Travel Plan:
In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that there is insufficient provision of, or support for, sustainable transport options. This will create a greater number of trips via private car which will create a severe impact on the local transport network and the environment and is contrary to NPPF 109, 111, 115, 117, 118, and Hampshire County Council's emerging Local Transport Plan 4.

I trust that the above is clear but please do not hesitate to contact Sophie Osborne on the above contact details should you require any further clarification.

Yours faithfully,

Sophie Osborne
Senior Transport Planner – Highways Development Planning
Hampshire 2050