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Date	4 March 2026	Email	havantdc@hants.gov.uk

For attention of Ms Wells

Dear Madam,

**Re: APP/25/00744 At Land West of Coldharbour Farm Road, Emsworth,
PO10 7XA**

**Variation of Condition 2 and Condition 17 of planning permission
APP/19/01226 to regularise minor adjustments required by the S278
Technical Approval Process.**

Thank you for your re-consultation on the above planning application. The applicant is seeking to vary conditions 2 and 17 of planning application APP/19/01226 to alter the access arrangements into the site.

In response to previous comments dated 05 November 2025 revised plans have been submitted which include the interaction of the site access arrangement with the internal layout of the site and existing Coldharbour Farm Road. This formal response has been informed by a site visit undertaken by the Highway Authority on 11 February 2026. The applicant has constructed the access arrangement covered within the revised submission drawings at risk and without approval from the Highway Authority.

Stage One/Two Road Safety Audit (RSA1/2)

The RSA1/2 Audit raises 7 safety related concerns with the proposed access arrangement. The designer's response agrees and accepts all of the issues raised however in most instances; the responses are considered insufficient to address the safety concerns raised.

The Highway Authority note that items B.3.2 and B.4.2 relating to road markings and an additional row of tactile paving either side of the crossing

Director of Universal Services
Patrick Blogg

point respectively have been resolved given the access drawing has been updated to incorporate the recommendations of the auditor. This does not counteract the fundamental safety issues the Highway Authority have of the access arrangement as constructed.

Access Design

The revised access design is shown within drawing JUB-XX-XX-DR-C-100 Rev C8.

General comments:

The alignment/tie in results in kink in the road, which could force westbound vehicles to move out or strike kerb line. This should be addressed and would have implications on the tracking of vehicles as discussed further within this response.

Item B.1.1 of the RSA1/2 raises a risk of side swipe collisions due to the proposals creating a reverse curve. The auditor recommends that the proposed access roads meet the existing bend at the tangent. The designer's response notes that this cannot be remove without reducing the carriageway width and instead suggests that the provision of the edge carriageway markings (in response to item B.3.2) should aid as appropriate mitigation. The Highway Authority request confirmation from the auditor that this response suitably addresses the safety issue raised.

The raised table construction has been identified within item B.2.2 of the RSA1/2. The auditor raises concern that the ramp is insufficient to slow vehicular speeds appropriately on approach to the crossing leading to conflicts with pedestrians (and cyclists). The designer accepts the issue and notes that levels will be maintained as required. This is not considered to have appropriately addressed the audit item and there is no acknowledgement on the construction details of the proposed ramp to ensure these are appropriate to reduce vehicular speeds. The Highway Authority would require the raised table crossing to accord with HCC standard details and this should be confirmed by the applicant.

Interaction with the existing parking area:

The revised design presented does not appropriately consider access into the existing parking area. The layout requires cars to drive and manoeuvre over the footway at awkward angles which is unacceptable and compromises pedestrian safety.

Additionally, as observed on site, contractors utilising the parking area to the south of the tactile crossing point are driving over the crossing to park given the parking area is flush with the shared use provision. This is a fundamental highway safety issue. Vertical separation would be required to provide suitable mitigation between the parking area and the shared use provision. Regardless, even if this is provided, manoeuvring over the footway to access the spaces would be required to the detriment of highway safety. This is not supported by the Highway Authority.

Item B.2.1 of the RSA1/2 raises concern with the current construction details and the speed at which vehicles will access the proposed parking south of the tactile crossing point. The designer accepts the problem but provides no solution or action in which to resolve the comments raised by the auditor but instead suggests this requires further review given the levels remained as existing to address the culvert issues.

Treatment of Cyclists:

The revised access design incorporates corduroy paving and 'cycle dismount signs', presumably due to insufficient achievable visibility for cyclists. This is not acceptable to the Highway Authority, and it is considered unreasonable to require cyclists to dismount given this conflicts with the aims of the route, and cyclists may not dismount as directed by the proposed signage. The route is identified on the Havant Cycle Map as an off-road cycle track and advertised as a place where cyclists can learn to safely cycle. From on-site observations, this route was well utilised by cyclists, and cyclists were not dismounting to proceed across the crossing.

This matter has been picked up under item B.4.1 of the RSA1. The designer accepts this issue and notes that suitable visibility will be provided with the land controlled by the applicant and/or the Highway Authority to ensure splays remain clear. No visibility splays have however been evidenced to outline that suitable visibility can be achieved in the first instance. Within the designer's response, the applicant fails to acknowledge that the design of the crossing layout as implemented is incorrect in its design requiring cyclists to dismount. The corduroy paving and cycle dismount signage must be removed as this undermines the previous position of the Highway Authority on the need to protect this core cycle route and ensure it remains safe and suitable for purpose.

Visibility

Item B.3.1 of the RSA1/2 raises concerns with the achievable visibility with the designer's response noting that the land required to remain clear either falls within the highway or land under the control of the applicant. The visibility splays should be overlaid over the highway boundary and red line of the applicant to establish whether visibility can be achievable without reliance on 3rd party land. Currently it is unclear whether this is the case regardless on whether or not the splays have been drawn correctly.

Pedestrian and Cycle:

Pedestrian visibility splays have been drawn at a setback of 0.5m provided in one direction only. As set out above given the requirement for cyclists to not dismount at the proposed crossing point, cycle visibility splays should be demonstrated. In accordance with HCC TG3 this requires a 2.4m 'x' distance. The 'y' distance can be drawn commensurate with a 30mph speed limit along Cold Harbour Farm Road (43.0m) and based on the design speed internally. It is unclear whether suitable unobstructed cycle visibility can be achieved given the proposed alignment of the route, particularly when cycling north. Visibility splays based on on-site observations and the drawing presented will be

obstructed by the car parking proposed to be retained through the access proposals.

As aforementioned, this route has been observed to be well utilised by both pedestrians and cyclists and therefore it is critical that appropriate visibility can be achieved to ensure this route remains safe, suitable and fit for purpose.

Vehicular:

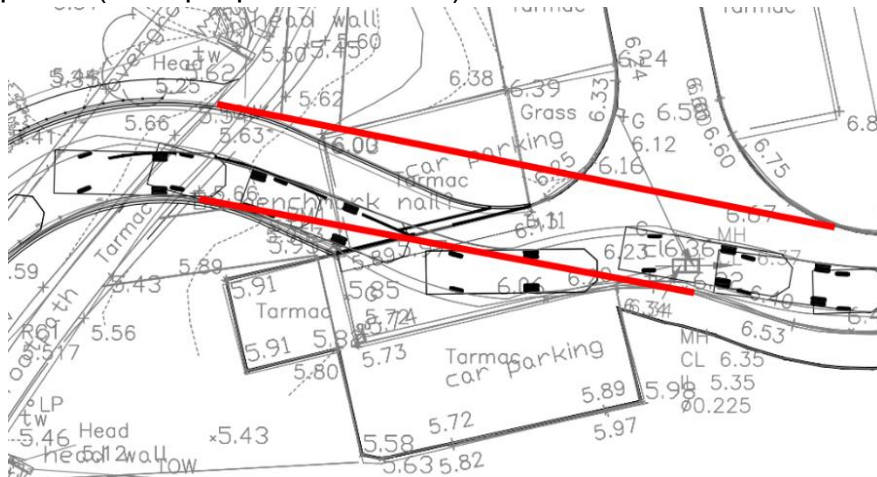
No forward visibility around the bend along the access road has been demonstrated. This should be presented in accordance with the proposed design speed. It is unclear whether this can be achieved within land under the ownership of the applicant or within the publicly maintainable highway. This is discussed further below in conjunction with tracking requirements.

Swept Path Analysis

Swept path analysis for a variety of different scenarios are presented within the following drawings:

- Drawing JUBB_XX_XX_DR_C_1203 Rev P2 – Car
- Drawing JUBB_XX_XX_DR_C_1202 Rev P2 – Fire Tender
- Drawing JUBB_XX_XX_DR_C_1221 Rev C2 – Pantechicon and Car
- Drawing JUBB_XX_XX_DR_C_1200 Rev P2 – 11.20m ‘Super Large’ Refuse
- Drawing JUBB_XX_XX_DR_C_1220 Rev C2 – 11.20m ‘Super Large’ Refuse and Car

The Highway Authority note that all the tracking presented does not show the s278/built layout, with the kerbing and footway across the parking area, and appear to show a different alignment. The tracking utilises a ‘give-way’ arrangement and does not consider the alterations to the existing cycle route. Most the tracks appear to use this area designated as footway to undertake movements, which is a highway safety issue and would be wholly unacceptable (example provided below):



Whilst these have been presented for an incorrect layout the Highway Authority have the following concerns with the tracking presented which are likely to remain when updated in-line with the as-built arrangement.

The car tracking does not show opposing movements in the same viewport so the Highway Authority are unable to confirm whether these would be achievable. It appears that these would not be able to occur simultaneously suggesting that the access design is unable to accommodate required movements in a safe and suitable manner. This should be confirmed when presented on the correct alignment.

The drawings demonstrate that the 11.20m 'super large' refuse, fire tender and pantechnicon unable to pass a car for a significant distance well outside of any forward visibility envelopes. It is unclear whether suitable visibility could be achieved between the opportunities where these vehicles can pass. This may lead to conflicts within the internal layout leading to perceptions of feeling unsafe and encourage reversing which is not acceptable. The Highway Authority are not satisfied that the revised layout presented can operate in a safe and suitable manner and in accordance with HCC TG2.

It is noted that no tracking for the retained parking area has been shown. As per the S278 design it would suggest vehicles will be reliant on manoeuvring over the footway and carriageway which is a highway safety issue and would not be supported. The tracking would not appear to work with conflict between the main carriageway and parking areas. Whilst updated tracking based on the as-built/s278 plans should be provided, it is unclear how this would override concerns as raised within this response.

Recommendations

The proposed revisions outline a significant move away from the consented scheme particularly in terms of alignment shared use pathway and its interaction with the access road. These matters as set out within this response are fundamental to be addressed to ensure safe and suitable access can be achieved particularly when considering the interaction with the cycleway provision.

The Highway Authority seek to reiterate that the applicant has been constructing these works at risk, and they will be required to alter the scheme as-built to suitably address the concerns raised within this response.

Having regard to the above the Highway Authority object to the proposed variation of conditions.

Yours faithfully,

Sophie Osborne
Senior Transport Planner – Highways Development Planning
Universal Services