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Date	9 March 2026	Email	havantdc@hants.gov.uk

For attention of Mr Weaver

Dear Sirs

**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 planning application. The Highway Authority previously recommended refusal for this site based on the evidence base presented at the time in a formal response dated 20 November 2025. For clarity these reasons for refusal were as follows:

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

Director of Universal Services
Patrick Blogg

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.

In response to these reasons for refusal the applicant has submitted the following documents and various transport related drawings:

- Technical Note – Sustainable Transport Target and Travel Plan (Rev C) (dated 04 February 2026)
- Technical Note – Southern Access Roundabout (dated 06 February 2026)
- Technical Note – Emergency Access (dated 06 February 2026)
- Technical Note – Modal Filter/Shared Use Facility (dated 06 February 2026)
- Technical Note – Access (dated 06 February 2026)

KC advice has also been obtained by the applicant dated 09 February 2026. This is considered by the Highway Authority alongside the additional Technical Notes presented.

Sustainable Transport Target and Travel Plan TN

Whilst it has been acknowledged that the site will benefit from these facilities and services committed to be delivered as part of the MDA. The Highway Authority has made the applicant aware through the contribution requests that some of the infrastructure in which the site would benefit from identified by the MDA, has funding shortfalls and requires additional funding provision to deliver the core accessibility connections secured.

To reiterate, the sustainable transport improvements to overcome deficits in the existing infrastructure identified by the Highway Authority are as follows:

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 KC advice obtained by the applicant sets out that the schemes identified by the Highway Authority are not unreasonable except for the request for RTI

information at the Victoria Road bus stops. It was requested that the shortfall in funding for items 2-4 is provided and a suggested CIL Reg. 122 compliant contribution presented. The TN provided also does not dispute the scope of the improvements identified but notes that clearly any contribution request would need to meet the CIL 122 Regulations. Given the above, the Highway Authority are minded to remove item 6 from the overall package of measures a financial contribution would be secured towards.

Tables 1.8-1.10 of the TN sets out the predicted number of walk, cycle and public transport trips generated by the development that are likely to utilise the improvement schemes identified based on route choice in the AM, PM peak and daily periods. It is noted that the assessment undertaken relies on infrastructure within the Berewood MDA being delivered, such as the local centre and health facilities. The trips accounted for does not cover all of the daily multi-modal trips that are proposed to be generated in line with the vision-led assumptions (54 pedestrian, 54 cycle and 61 public transport). Surveys have not been undertaken for existing users to establish route choice and therefore the assumptions made within the TN are considered to be theoretical. The percentage increase of sustainable transport trips generated by the development along these routes, are therefore unclear.

The agreed target modal share for the site to be assessed against of 31% is considered to be realistic when based against travel plan survey data for the wider Berewood MDA. It does however fall short of the required 50% of all trips to be undertaken by sustainable modes by 2030 as set out by Active Travel England. Clearly, any opportunities to increase sustainable transport uptake above that predicted should be encouraged to be achieved.

In order to make a development acceptable, it is not just about providing the level of infrastructure to encourage sustainable transport trips associated with the development but also about mitigating against additional car use to accommodate additional trips on the network generated by the development. Whilst the modelling work of the Houghton Avenue/Maurepas Way roundabout suggests that theoretically the roundabout continues to operate in capacity with the additional trips, in practice, the junction is known to be under strain, particularly during the peak periods. Offsetting wider vehicular trips through the delivery of sustainable transport improvements is therefore critical to mitigate the impact of the development whilst complying with the NPPF and LTP4.

The Highway Authority reiterate below why items 1-5 meet the CIL 122 regulations and provided the shortfall in funding at the request of the KC. The Highway Authority can share detailed costs with the applicant if considered necessary to inform discussions. Direct engagement with the Highway Authority is encouraged to agree an appropriate contribution figure to mitigate the impact of this development.

Cycle Improvements between Laxton Leaze and Plant Farm Crescent:

The applicant has already agreed to deliver these improvements as whilst outside of the site boundary, fall within their gift to be able to deliver. This includes widening of the existing connection to 3.0m and kerbing amendments to provide appropriate cycle access onto the existing shared use provision along Plant Farm Crescent. A drawing has not been provided of these works as previously requested and will be necessary to be provided prior to the signing of the s106 agreement to make it clear the works to be delivered by the applicant to mitigate the impact of the development. To inform discussions on the contribution, it is requested that detailed costings are provided by the applicant on the delivery of these works as it is acknowledged that they have wider benefit to network users.

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. 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 £815,000 and there is currently no funding to deliver this 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 and is therefore critical to provide safe and suitable crossing facilities at the main access arrangement this site will be reliant upon. The scheme has been costed at £493,000 for delivery and there is currently a funding shortfall of £363,000 when the MDA contribution is accounted for.

Forest End Roundabout:

A scheme has been developed to improve the pedestrian and cycle 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 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. The scheme developed by the Highway Authority incorporates new sections of shared use provision with improved cycle

connectivity around the roundabout and Forest End itself. This has an estimated cost of delivery of £433,000 and there is currently no funding available to deliver these works.

Wayfinding Strategy:

The applicant has already previously agreed to contribute towards a wayfinding strategy to key facilities and services. Wayfinding in general has been found to be beneficial, particularly where the time to access facilities is provided, to improve the uptake of sustainable modes of residents are clear of the route to be taken. Wayfinding strategies generally cost around £20,000 to deliver. The delivery of wayfinding is not effective in isolation and should therefore be considered in conjunction with the additional improvements as referenced above.

Summary:

The cost of the total strategy as identified by the Highway Authority where detailed costs are available is £1,268,000 plus the Laxton Leaze works.

The Highway Authority consider it reasonable to utilise the £363,000 funding deficit towards the Houghton Avenue crossing (28% of the cost of the total strategy where costs are available) to calculate a contribution to mitigate the impact of this development.

The Highway Authority are mindful that any proportionate contribution needs to appropriately consider the fact that this development is delivering off-site improvement works to rectify existing deficits within the Berewood MDA which have a wider benefit (the Laxton Leaze works). A proportion of the cost of these works could therefore reasonably be deducted from the £363,000 figure. Alternatively, the Highway Authority are willing to consider that no contribution requirement would be necessary if the Houghton Avenue crossing works were delivered by the applicant via S278.

This contribution request is considered by the Highway Authority to meet the CIL 122 Regulations. The works are directly related to the development and necessary to make the development acceptable in planning terms given this will contribute towards the delivery of clear deficits in the existing infrastructure which will provide improved opportunities to the walking and cycling infrastructure to support access to local facilities and services available to the development. To ensure that the contribution is fair and proportionate and reasonable in scale and kind, the Highway Authority have acknowledged the wider benefit of the works that are directly being delivered by the applicant to mitigate the impact of the development.

The Highway Authority welcome engagement with the applicant to agree the contribution figure to mitigate the impact of the development and encourage sustainable transport uptake in line with the vision-led assumptions. Whilst the Highway Authority consider that the scope of items 2-5 above are necessary and directly linked to the development as per the Regulation 122 regulations

and any contribution should be available to utilise towards one or all of these schemes, it is still necessary to agree the proportionate level of contribution.

Travel Plan:

Whilst the core measures of the travel plan have been previously agreed, the travel plan should be updated to reflect the agreed vision-led trip generation assumptions and the off-site mitigation package. This should be provided and agreed in writing with the Highway Authority prior to signing of the s106 agreement.

Emergency Access TN

The TN summarises 3 possible options to overcome the concerns raised within the latest formal response on this application, however, ultimately suggest that for the quantum of development, whilst it is good practice, there is no policy requirement for an emergency access to be provided. This is supported by the legal opinion obtained by KC. The Highway Authority would be minded to agree to the removal of the emergency access in this location, therefore removing the grounds for refusal on this matter.

Modal Filter/Shared Use Facility and Access TN

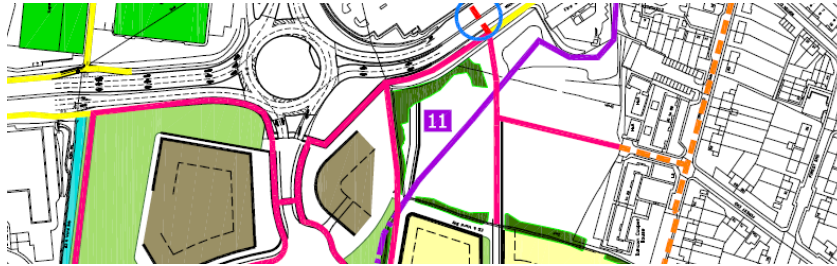
To clarify the need to provide the modal filter to prohibit vehicular traffic and concerns on the tracking presented stemmed from the safety concerns regarding the interaction with cyclists joining the carriageway where the segregated shared use provision terminates within the site. The Highway Authority remain of the view that a modal filter was necessary to ensure safe and suitable access was provided for all users when the segregated cycle provision access arrangement was proposed (drawing GTWVILLE_BSL/SK/02 Rev T), for reasons set out within the previous formal responses. However, the applicant has presented a revised access arrangement within drawing GTWVILLE_BSL/SK/17 Rev A which removes the dedicated cycle provision and addresses the safety concerns raised. This is discussed in detail below.

Revised Access Arrangement – Removal of the Segregated Shared Use Facility:

To override the access reason for refusal, a revised access arrangement has been presented which simplified the access arrangement by omitting the segregated facility with cyclists to be placed on carriageway. The KC advice obtained from the applicant supports this removal given the safety concerns that have arisen and ultimately led to the reason for refusal were due to the provision of the segregated shared use provision to feed into the access arrangements.

This revised access arrangement is shown within drawing GTWVILLE_BSL/SK/17 Rev A and provided within Appendix C of this TN where 2.0m footways are provided either side of the carriageway tying into the existing provision along Laxton Leaze. For the avoidance of doubt, this incorporates the amendments requested on the previous access arrangement with the carriageway width reducing to 5.0m from 5.5m which accords with HCC TG2 tertiary street requirements.

The removal of the dedicated cycle provision is disappointing and considered poor design given the applicant seeks to remove a well-established traffic free cycle route which was secured through the outline consent for the Berewood MDA and identified as a key footway/cycleway to access Waterloooville Town Centre on the Non-Car Accessibility Plan. The planning implications for the Berewood MDA development would need to be considered by the planning authorities.



Notwithstanding this, the applicant sets out an evidence base that in accordance with LTN 1/20 and HCC TG10, on-carriageway provision would not contradict local and national policy. This policy position is not disputed.

The removal of the segregated shared use provision allows for the pedestrian crossing point to be located further east within the development parcel. Again, this improves the interaction with Peasgood Lane moving pedestrians further away from the junction with Laxton Leaze and reducing the number of conflict points in this location. Pedestrian visibility splays of 1.5m x 25.0m commensurate with the 20mph design speed have been presented on drawing GTWVILLE_BSL/SK/17 Rev A. The Highway Authority are satisfied that suitable visibility can be achieved both along Laxton Leaze and within the development. Visibility will be suitably conditioned as part of any future planning consent.

Swept path analysis has been provided within drawings GTVILLE_BSL/VT/01 Rev H and GTWVILLE_BSL/VT/04. All junctions have been tracked at 10mph. The key point of discussion is the ability for access from Peasgood Lane to be achieved in a safe and suitable manner. The tracking via Laxton Leaze has been previously agreed with the Highway Authority. It is noted that this has been provided on the previously proposed access arrangement however given the alignment of the carriageway remains the same this remains relevant for the revised access arrangement.

It is noted that the tracking scenarios presented do not technically comply with HCC TG2 guidance, however it is appreciated that this is a bespoke scenario that requires consideration of the interaction between a private mews style arrangement and a secondary street.

The drawings demonstrate that whilst tight, the movements are achievable for a fire tender, delivery vehicle and car scenarios tracked without overhanging any footways. The fire tender tracked is slightly shorter than that stipulated within the HCC guidance (7.90m length rather than 8.10m required), however in the professional opinion of the Highway Authority this would not

fundamentally alter the tracking movement presented. The delivery vehicle is only presented for the tightest manoeuvre that is likely to occur and whilst additional scenarios have not been presented, the Highway Authority are content that this could operate in a safe and suitable manner. It is noted that this has been tracked for a larger vehicle than set out within HCC TG2 (4.6t van required) and therefore the movements demonstrated are likely to be more onerous than what the guidance stipulates.

Suitable achievable visibility has been demonstrated from Peasgood Lane, and in reality, vehicles accessing the site from Peasgood Lane are likely to wait until an approaching vehicle has passed before turning left into the site. Whilst intervisibility splays have not been provided, the Highway Authority consider that where vehicles cannot pass along Laxton Leaze, suitable intervisibility would be achievable. Based on the information previously presented by the applicant, it is anticipated based on current movements that a worst case 29 daily trips would utilise Peasgood Lane over a 12-hour period to access the site. Given the scale of the development, it is considered that the likelihood that two vehicles will meet will be low and therefore not a fundamental highway safety issue.

For the 11.20m 'super large' refuse vehicle, the swept path analysis outlines that when turning left into the site from Peasgood Lane, the vehicle would overhang the footway on the southern side of the carriageway. It is noted that this has been based on the existing access layout and not the proposed arrangement as most recently presented whereby the pedestrian crossing point has been re-located further east within the development, removing the conflict with the crossing point as shown however the alignment remains the same. Regardless, from previous discussions with the Refuse Authority, it is understood that they are amenable to alter their routing as required. Clearly, servicing vehicles could access the site via Laxton Leaze unimpeded without implications for footway users, and therefore given this, this would not be a safety reason for refusal.

Southern Access Roundabout TN

The applicant rebuts the need for a condition to be placed on this planning application to ensure that the Southern Access Junction is in place prior to the occupation of any development on this land.

The applicant reiterates the percentage impact assessment undertaken which outlines a less than 1% increase in trips when compared to the existing baseline flows upon all approaches to the junction. The Highway Authority agree with the TN and the KC advice, that the additional flows through the junction generated by this development are very low. Regardless, the concern of the Highway Authority is not a question of the isolated impact on the roundabout but considering the cumulative harm at this junction in conjunction with wider ongoing discussions of the Berewood MDA and the delayed delivery of the infrastructure.

Significant modelling work was undertaken and agreed with the Berewood applicant informing discussions on a revised trigger for Grainger to commence on site and to deliver the Southern Access Junction works. It is unclear if the applicant is utilising the updated model given there appear to be discrepancies between the two outputs. Notwithstanding any discrepancies, the modelling results presented outline that the cumulative harm of additional development trips push the roundabout over 1.00 RFC in the PM peak period, therefore having a clear cumulative impact on the safe operation of the junction.

The Highway Authority is not minded to recommend a reason for refusal on this matter but raises it with the planning authorities for awareness regarding the status of the works.

Recommendations

Having regard to the above, the Highway Authority provide no objections to this planning application subject to the following s106 obligations and conditions:

S106 obligations:

- Prior to commencement to enter into a Highways Agreement for the site access works as shown indicatively within drawing GTWVILLE_BSL/SK/17 Rev A
- Prior to commencement to enter into a Highways Agreement for the cycle improvement works between Laxton Leaze and Plant Farm Crescent (drawing to be provided)
- Prior to commencement to either:
 1. Pay a financial contribution to be agreed with the Highway Authority (index linked to March 2026) with respect to walking and cycling improvements for the following (in no priority order):
 - a) Delivery of the Southern Brambles Link
 - b) Delivery of Houghton Avenue parallel crossing
 - c) Delivery of pedestrian and cycle improvements at the Forest End roundabout as identified on the Havant LCWIP
 - d) Delivery of wayfinding strategy towards key facilities and destinations
 2. Or enter into a Highways Agreement to deliver the Houghton Avenue parallel crossing works and for these works to be delivered to completion certificate standard and open to use prior to first occupation
- Prior to occupation for the site access works and cycle improvement works to be constructed to completion certificate standard
- Prior to occupation, a full travel plan in accordance with the framework travel plan to be submitted to and agreed in writing with the Highway Authority
- Prior to occupation payment (by developer) of HCC fees in respect of the approval (£750) and monitoring (£5,000) of the full travel plan

- Prior to occupation, provision of a bond or cash deposit (amount to be agreed with the Highway Authority) in respect to costed measures within the travel plan plus a 10% surety
- Public rights to pass and repass on foot and bicycle on areas not adopted by the Highway Authority

Conditions:

1. No development shall start on site until a construction method statement has been submitted to and approved in writing by the Planning Authority, which shall include:
 - a) A programme of and phasing of demolition (if any) and construction work;
 - b) The provision of long-term facilities for contractor parking;
 - c) The arrangements for deliveries associated with all construction works;
 - d) Methods and phasing of construction works;
 - e) Access and egress for plant and machinery;
 - f) Protection of pedestrian and cycle routes including the PRow during construction;
 - g) Location of temporary site buildings, compounds, construction material, and plant storage areas;
 - h) Details of the methodology for ensuring dirt is not transferred onto the highway from the site (i.e. wheel washers), and onwards mitigation should this fail, such as the employment of mechanical road sweepers, and the subsequent refresh of street lining (as and when required) should this be damaged during the process.

Demolition and construction work shall only take place in accordance with the approved method statement.

Reason - In order that the Planning Authority can properly consider the effect of the works on the amenity of the locality and in the interest of Highway Safety

2. The approved lines of site splays within drawing GTWVILLE_BSL/SK/17 Rev A shall not be subject to any obstruction between 0.6m and 2.0m above the adjacent carriageway. Boundary features or any design through the reserved matters stage shall not exceed 0.6m in height and shall be subsequently maintained so thereafter.

Reason – In the interest of highway safety

3. Prior to the commencement of the development details of the following items must be agreed in writing with the Highway Authority:
 - a. Final Street lighting design

- b. Final Drainage strategy in so far as it relates to the site access, interaction with adopted highway drainage and safe operation of the internal layout
- c. Final ground levels plan in so far as it relates to the site access, interaction with adopted highway and safe operation of the internal layout
- d. Final Materials Plan

The above matters should be implemented in accordance with the approved plans and be implemented prior to the occupation of any dwellings of which are reliant on such part of the network for access

Reason: In the interests of highway safety and safe and suitable street design

- 4. The details submitted in relation to the reserved matters stage shall include details to demonstrate an appropriate street design. These details shall include:
 - a. Street Lighting Strategy
 - b. Drainage Strategy and Design details in so far as it relates to the site access, interaction with adopted highway drainage and safe operation of the internal layout
 - c. Ground levels plan in so far as it relates to the site access, interaction with adopted highway and safe operation of the internal layout
 - d. Final materials plan
 - g. Land required in order to keep visibility clear shall either fall within adoptable areas of the Highway Authority or private management company and not cross third-party land.

The above matters should be implemented in accordance with the approved plans and be implemented prior to the occupation of any dwellings of which are reliant on such part of the network for access

Reason – In the interest of highway safety and safe and suitable street design

- 4. Prior to the first occupation of the development, a site management plan will be submitted to and approved in writing by the local planning authority that identifies any areas within the site that will form part of any highway adoption, controlled by a site management company or transferred as part of plots for private ownership. The approved plan shall thereafter be implemented, unless otherwise agreed in writing by the local planning authority

Reason – In the interest of safe and suitable street design

- 5. In relation to all roads, footways and cycleways to be provided on site the following requirements shall be met:

- a. All roads, footways and cycleways, whether to be adopted or otherwise, shall be built to national recognised design construction standards and completed prior to occupation
- b. A verification report by a suitably qualified engineer confirming that all unadopted roads, footways and cycleways have been built to the nationally recognised design construction standards shall be provided to the Local Planning Authority on completion of the final road surface or prior to occupation. The report shall include the relevant construction details that the roads, footways and cycleways have been built to and details of the professional qualifications of the person providing the verification.

Reason: To ensure that the development is provided to an appropriate standard

S38 Informative:

As the proposed access and internal layout is to be offered for adoption, the applicant should enter into the S38 process with the Highway Authority at the earliest opportunity to finalise the detailed design matters associated with conditions 3 and 4 to ensure that the proposed development and detailed design is agreed and constructed in accordance with adoptable design standards prior to first occupation.

Yours sincerely,

Sophie Osborne
Senior Transport Planner – Highways Development Planning
Universal Services