

# Cumulative Impact of Development on the Havant Strategic Road Network Junction Cluster

Campdown (APP/23/00488) and Southleigh (APP/26/00324)

**For the attention of:** National Highways, Planning South East Team  
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**For inclusion in the planning file for:** APP/23/00488 (Land East of College Road, Campdown/Purbrook) and APP/26/00324 (Southleigh strategic site) – requested for addition to both case files

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## 1. Purpose of this document: closing the missing tier of cumulative assessment

Havant Borough Council's case officers are, by the structure of the planning system, required to assess each application against its own supporting documentation and against the National Planning Policy Framework. Neither exercise asks a case officer to weigh one application's impact against another's, and in the continued absence of a currently adopted Local Plan for the borough, there is no borough-wide reference point against which cumulative impact across multiple applications could even be measured, were an officer minded to attempt it.

Hampshire County Council Highways, to whom detailed technical scrutiny of transport documentation is delegated, appears in practice to mirror this same application-by-application approach rather than to correct it. Havant's particular geography<sup>1</sup> compounds the effect: a restricted cluster of six SRN junctions, limited rail crossing points constraining east-west movement, and no direct SRN route between the north and east of the borough mean that traffic decisions taken in respect of one application routinely, and predictably, affect the operating conditions relied upon by another.

The result is a missing layer above the level at which any single officer, at either tier, is required or resourced to look: no one is currently positioned to ask whether Havant's SRN access, taken as a whole, can absorb the combined effect of the applications now before the Council. This document is submitted to fill that gap, not to substitute for the technical assessment properly carried out by HCC Highways and National Highways, but to set out the wider view that the current structure does not otherwise provide.

This document sets out three linked concerns regarding the cumulative impact of development on the strategic road network (SRN) serving Havant. First, it sets out the absence of effective local authority control and coordination over traffic growth across Havant borough – a relatively small market town whose connections to the SRN are constrained to six junctions, several with

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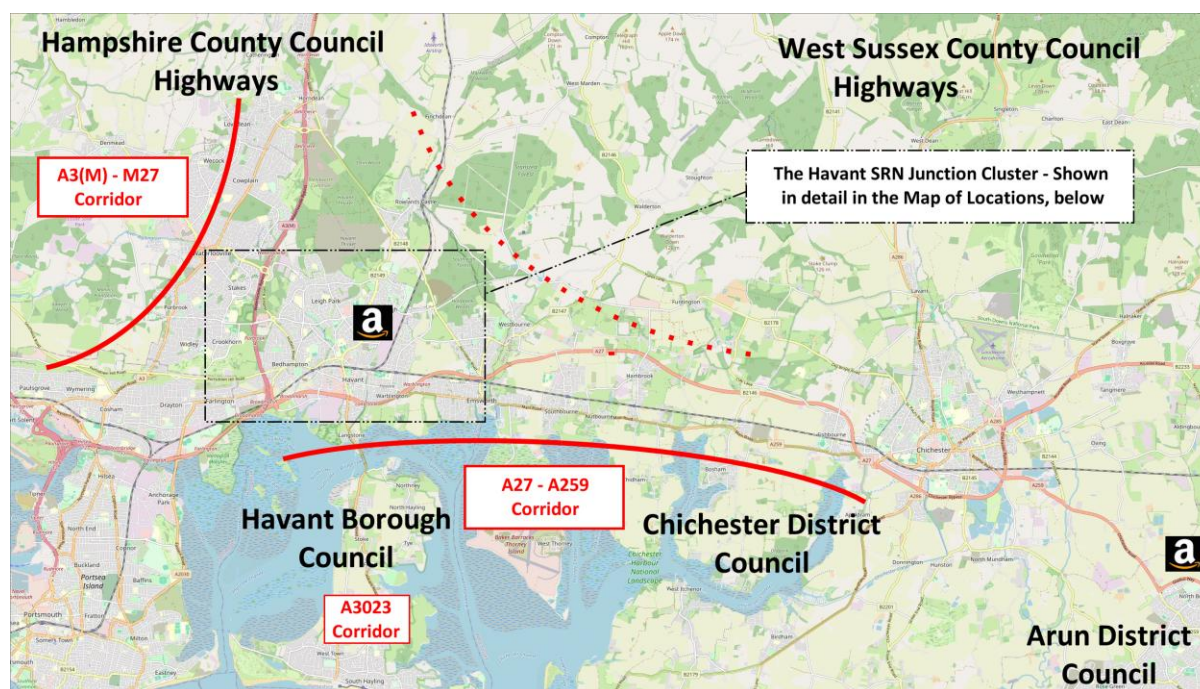
<sup>1</sup> Refer to Map of locations

restricted access, and which lacks any direct SRN connection between points north of the borough and points east of it. Second, it argues that without new junction access at the long-proposed but undelivered “SRN-6?” Southleigh Link Road connection to the A27, the Southleigh development (APP/26/00324) represents an unacceptable additional traffic load which can only reach the SRN by routing through already congested residential streets. Third, it reinforces concerns already raised, and still live, in respect of the Campdown application (APP/23/00488), for which National Highways’ most recent formal recommendation (NHPR 25-01, 10 April 2026) continues to withhold support for permission pending resolution of outstanding traffic modelling requirements.

These are not three separate arguments but one: the same structural gap in SRN access and inter-authority coordination that has left Campdown unresolved for almost three years is the gap that Southleigh, at a substantially larger scale, would compound. National Highways is accordingly asked to treat this document as a single submission relevant to both case files, rather than as two independent representations.

This document is compiled from cross-referenced primary sources - FOI responses, correspondence, and applicants’ own submitted documentation - rather than independent traffic modelling; where it identifies gaps, it does so by tracing inconsistencies between those sources rather than by disputing technical findings.

## 2. The broader context



The map above sets out the wider strategic context within which the SRN junction cluster addressed in this document sits. Havant’s connections to the strategic road network divide into two corridors - the A3(M)/M27 to the north and west, and the A27/A259 to the east - with no direct SRN link between them: traffic moving between the two corridors that does not pass through the SRN cluster itself must instead cross the borough on local roads. Oversight of the area is correspondingly split across five local authorities - two highway authorities, Hampshire County Council and West Sussex County Council, and three planning authorities, Havant

Borough Council, Chichester District Council and Arun District Council - each holding only a partial view of a road network whose pressures do not respect those boundaries.

The map extends east as far as Bersted to show the location of Amazon's DBN5 delivery station, for the same reason DBN5 and DPO1 are discussed together later in this document (Section 11): the two sites operate as one flexible network rather than in isolation, and any assessment of traffic on this corridor that treats them independently understates their combined effect.

Havant's residential and commercial connections with the strategic road network are constrained by six significant junctions and the local rail crossing points, each of which have fundamental design restrictions or local peak capacity challenges. The safe and efficient operation of the SRN junctions is influenced, directly or indirectly, by decisions made by Havant Borough Council on economic regeneration and proposals for development. Hampshire County Council Highways have delegated responsibility for traffic and transport matters, with National Highways providing an overarching role regarding the strategic road network.

However, there are two apparent issues with this structure. The first is that there are observable gaps in process between the two tiers of the local planning authority. The second is that the National Highways agency is not always included as consultee on development proposals which contribute to cumulative loading of the following SRN junctions, shown on the map at the end of this document as:

**SRN-1** - the A3(M)/Hulbert Road junction at the northern edge of the Waterlooville Bypass, marking the northern boundary of the Havant SRN cluster addressed in this document.

**SRN-2** - A3(M) Junction 4, including the Purbrook Way / Hulbert Road 'Asda' roundabout and the B&Q mini roundabout at the eastern side of the dumbbell which also serves the new 'flagship' Lidl store.

**SRN-3** - A3(M) Junction 5, A27 Interchange, including the 'Rusty Cutter' roundabout and the 'Teardrop' dumbbell intersection with Harts Farm Way.

**SRN-4** - A27 Langstone junction connecting with B2149 (Havant) and A3023 (Hayling Island).

**SRN-5** - A27 Warblington junction with the A259 and linking central Havant and Emsworth with the A27 and A259.

**SRN-6?** - the currently undelivered 'Southleigh Link Road' connection between Bartons Road and the A27, via a new junction or a redesigned and extended Warblington interchange (SRN-5) - referred to throughout this document as the 'missing' junction. No committed delivery route or funding exists for this connection as of the date of this document.

Traffic flow at each of these junctions and on the surrounding road network is influenced by the characteristics of the junction design in the context of the local road network.

The two A3(M) junctions offer limited directional access closely dependent on adjacent roundabouts. These are increasingly burdened by successive developments, leading to peak time queues and rat-running traffic on the surrounding streets.

The A27 Langstone roundabout experiences significant daily and seasonal traffic peaks related to the Hayling Island A3023 traffic 'bottleneck', with additional demand from the successful Solent Road retail park which attracts a large and growing volume of out-of-town shoppers via the A27.

The A27 Warblington junction faces considerable strain from traffic generated by new housing developments between Emsworth and Chichester, approved by Chichester District Council. This development, for which traffic matters are managed by West Sussex County Highways, increases the pressure on the Warblington interchange given the lack of any alternative A27 access between the Emsworth/Warblington junction and the Fishbourne junction to the east.

A further factor common to all of these junctions is that traffic reaching them from the town's residential core must also cross one of a small number of historic rail crossing points - Park Road North, the New Lane level crossing, and the crossing serving Warblington - each with its own capacity constraints, discussed further at Section 7, below. Successive changes of use at the Havant North industrial estate, addressed in detail at Section 12 and in the table at Section 10, illustrate the resulting effect directly: traffic generated by that estate's shift from general industrial to Use Class B8 storage and distribution reaches the SRN cluster only by first crossing one of these pinch points.

A further, more general gap in the traffic-forecasting methodology relied on at every tier of this process is worth setting out here, since it affects the credibility of background growth factors applied across the whole SRN network, not just at any single junction.

The Department for Transport's TEMPro tool, and the underlying National Trip End Model (NTEM) it draws on, is the standard source for the background traffic growth factors applied in local transport assessments, including those discussed throughout this document. NTEM has no distinct trip purpose or vehicle mode for gig-economy home-delivery journeys: an Amazon Flex driver's trip has no home within NTEM's person-trip structure, and NTEM has no LGV or freight mode at all. The tools that do forecast LGV/HGV growth – the National Road Traffic Forecasts and the National Transport Model – are explicitly stated by the DfT not to be suitable for individual scheme appraisal. TAG Unit M4 (2023) itself concedes that *'most local models will not be able to forecast changes in freight traffic in detail'*. NTEM's per-person trip rates, meanwhile, have historically been frozen at a 2016 base, which cannot capture the shift from shopping trips to delivery trips on either side of that switch.

The Amazon DPO1/DBN5 corridor<sup>2</sup> illustrates this structural gap rather than being its cause: it is the local example of a nationwide methodological blind spot in the background growth factors that every transport assessment referenced in this document, including the Southleigh Transport Assessment, ultimately relies on.

This operational flexibility is not simply theoretical. The author has been a member of the Amazon DPO1 Community Liaison Panel - constituted in July 2023 as a documented condition of the site's planning consent - since its inception, and was told directly by the site's operations management, during a 2025 walk-around visit, that DPO1 was at the time of opening the first Amazon delivery station in the UK able to discharge two waves of delivery traffic in parallel through separate van exits. Whether or not that remains true today, the wider point is not in dispute: delivery operations of this kind are managed to meet customer promises across a network of sites rather than any single one of them, drawing on a growing proportion of unbranded vans driven by Amazon Flex's gig-economy workforce - traffic that is, by its nature, difficult for the local authorities to monitor and impossible for any single transport assessment to forecast with confidence.

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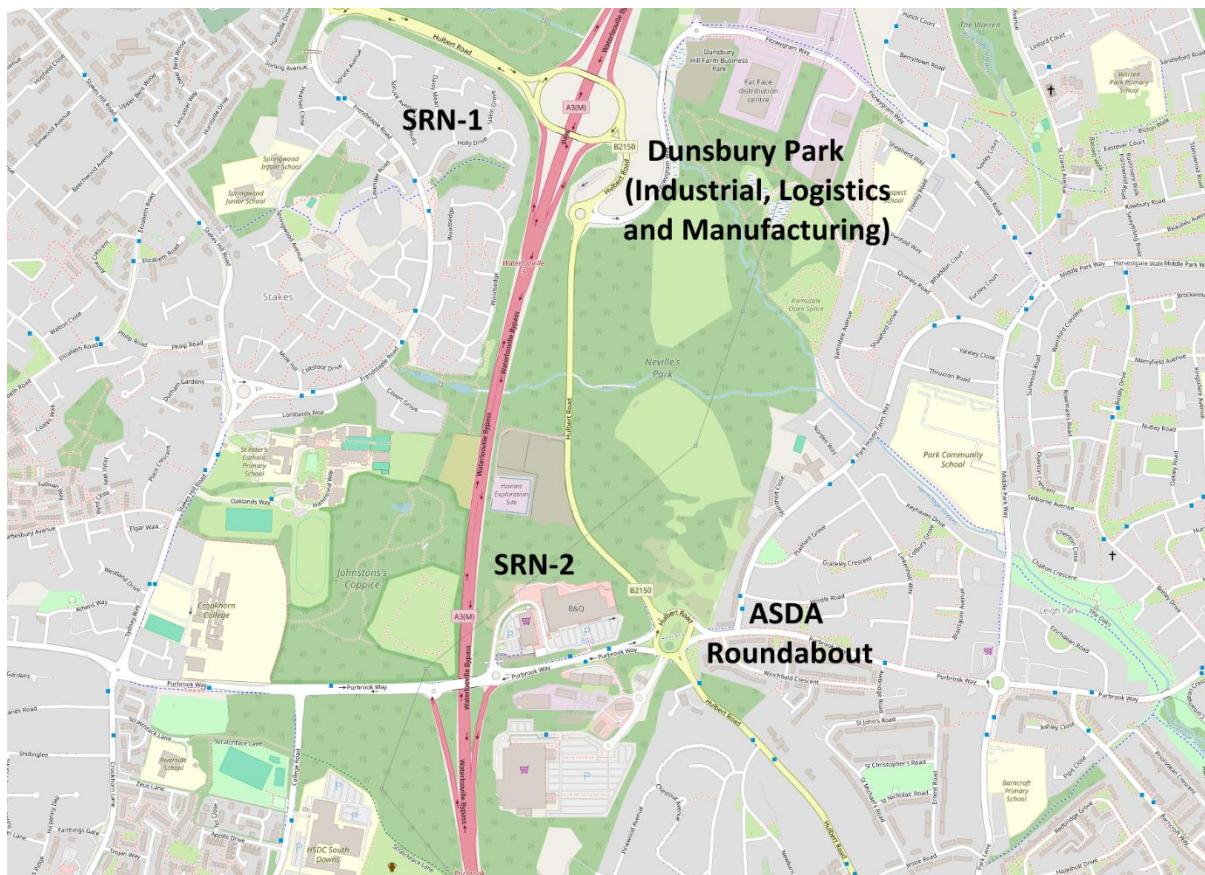
<sup>2</sup> Amazon UK's logistics network can shift volumes fluidly between DPO1 (Havant) and DBN5 (Bersted), making any attempt to forecast their delivery flows along the A259 corridor inherently unreliable.

### 3. Campdown (APP/23/00488): outstanding National Highways concerns

This section of the document provides commentary on concerns previously raised by National Highways' responses filed against Havant Borough Council planning application APP/23/00488 for 628 new dwellings on land East of College Road, at Campdown near Havant. The same concerns were filed against the previous, now-withdrawn planning application for the same site, APP/19/01101, to which the most recent update by National Highways was filed, possibly in error, in January 2025. National Highways has been engaged with the previous Persimmon Homes and current Dandara iterations of the Campdown housing development proposal.

There is widespread public agreement with the Agency's concerns regarding capacity-related queuing at and between junctions on the local road network in the vicinity of A3(M) J4. This junction by its design requires the nearby 'Asda roundabout' on Purbrook Way to provide A3(M) access to the north.

Despite extensive reconstruction and enlargement in 2015, there are now substantial queues forming at this roundabout at peak times. A comprehensive review of the signalling system is urgently needed to manage peak and seasonal 'pulses' of vehicle movements generated by Asda retail store traffic, Amazon DSP<sup>3</sup> despatch waves and the newly opened flagship Lidl store<sup>4</sup> which began trading in March 2026 at the Junction 4 east side 'B&Q' dumbbell roundabout.



<sup>3</sup> Delivery Service Partner (LGV traffic generation by Amazon DPO1, see Section 11)

<sup>4</sup> See Section 10, the Lidl store entry (APP/20/01221)

There are also capacity-related queuing issues at peak times in the vicinity of the A3(M) J5, notably on the 'Teardrop' interchange between the 'Rusty Cutter' roundabout and the A27.

The image above illustrates the SRN-1/SRN-2 junction cluster, showing the Asda roundabout at A3(M) Junction 4, the B&Q dumbbell, and the Purbrook Way/Hulbert Road layout.

These issues, together with the limitations of access to the SRN via these junctions gives rise to rat-running on the local road network, a problem magnified since Amazon's DPO1 site began operations at New Lane in 2023.

While it may seem counter-intuitive to link the Campdown development with the Rusty Cutter roundabout at J5, a significant amount of northbound traffic generated by this new development will access the A3(M) northbound by first heading south to Portsdown Hill Road, turning down Glebe Park Avenue to join the A3(M) at the Rusty Cutter, J5. Any other route following local streets to A3(M) J3 northbound, while apparently heading in the obvious direction, would be slower and more congested.

National Highways most recent recommendation for the site is as follows:

*"National Highways recommends that the Local Planning Authority does not grant planning permission for the application (Ref: APP/23/00488) until 9 October 2026 to enable us to resolve outstanding issues, and to allow us to 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 9 October 2026."*

This recommendation was given in **NHPR 25-01**, dated 10 April 2026 and issued under the authority of Hermes Luli, Head of Planning & Development, South East Region, signed by Beata Ginn (now titled Assistant Spatial Planner, Area 3). The stated reason is that National Highways has still not received the requested traffic models for the junctions of Purbrook Way with Crookhorn Lane/Stakes Hill Road, College Road, the A3(M) Junction 4 slips, and B2150 Hulbert Road (Asda roundabout), nearly three years after the original consultation (24 July 2023) began. NHPR 25-01 also records that National Highways has previously been engaged in developing a "decide and provide" access strategy for the site, which the applicant and Hampshire County Council are still understood to be negotiating – a further, dated instance of the cross-tier delay already identified in this document.

NHPR 25-01 also sets out standing advice on net-zero and modal shift, citing NPPF paragraphs 77 and 110 (significant development should offer a genuine choice of transport modes) and paragraphs 109 and 115 (opportunities to promote walking, cycling and public transport should be taken as part of a vision-led approach), together with the carbon reduction hierarchy at clause 4.3 of PAS2080:2023. This standing advice was given in respect of Campdown, but applies with at least equal force to Southleigh: a 1,800-dwelling development with no direct SRN junction access, reliant on residential streets to reach the A27, offers materially less genuine choice of transport mode than a site with direct strategic access would. National Highways is invited to confirm whether this same standing advice has been, or will be, applied consistently to its assessment of Southleigh (APP/26/00324).

A strong argument could be made for deferring any decision on planning application APP/23/00488 at Campdown until approval for a pre-requisite signalling upgrade to the Asda roundabout is given. Cumulative traffic generation associated with the recently opened Lidl retail store, the proposed Campdown development and the nearby proposal for Hulbert Road

(APP/20/00441) could prove to be the final factor that exceeds current manageable capacity at that integral part of the A3(M) J4.

To fully appreciate concerns raised over the ‘safe and efficient operation of the SRN’, however, it is necessary to take a broader look at the cumulative impact on the Strategic Road Network (SRN) of local authority planning applications and subsequent development projects in the Havant area over the past six years.

#### 4. SRN resilience: carriageway closures and forced diversion onto the local network

The cumulative impact case set out in this document has so far addressed steady-state conditions: the capacity of Havant’s SRN junctions under normal daily and peak-hour traffic. A related but distinct risk has not yet been addressed – the effect of planned and unplanned lane or full carriageway closures on the A27 and A3(M) sections of this junction cluster, and the diversion of displaced traffic onto a local road network that this document has already shown to be operating with little spare capacity.

Unlike routine congestion, a carriageway closure does not distribute its effect gradually across the network; it displaces the full traffic load of the closed section onto whatever alternative routes exist, for the duration of the closure, with little or no notice. On the A27 between SRN-5 (Warblington) and the Fishbourne interchange to the east – a section with no intermediate SRN junction – this is, in Havant Civic Society’s observation, a frequent occurrence, with breakdowns and collisions on this stretch displacing traffic onto the A259 to the south and Emsworth Common Road to the north on a near-weekly basis. Both of those routes already carry traffic generated by committed development already identified in this document, including cross-border growth from Chichester District Council and Amazon DPO1/DBN5 freight movements. A3(M) closures between SRN-1, SRN-2 and SRN-3 raise the same structural issue in relation to the northern and western approaches to Havant, forcing traffic onto the local road network serving Bedhampton, Leigh Park and Waterlooville in place of the strategic route it was designed to use.

This is, in Havant Civic Society’s assessment, a further instance of the same underlying methodological gap already raised in this document in relation to background traffic growth and peak-hour definition: Transport Assessments submitted in support of individual applications are modelled against typical-day, steady-state conditions, and do not, so far as Havant Civic Society is aware, test the local road network’s capacity to absorb SRN traffic under degraded or closure conditions – despite such conditions being a regular, foreseeable feature of this corridor rather than an exceptional one.

National Highways will hold comprehensive records of both planned and unplanned closures on these sections of the A27 and A3(M); Havant Civic Society does not have equivalent visibility of the Agency’s own network and does not attempt to reproduce it here. What National Highways may be less well placed to see is the effect such closures have once traffic leaves the SRN: the pattern described above is drawn from residents’ and Havant Civic Society’s own repeated observation of the local road network, not from a count of incidents on the trunk road itself, and is offered on that basis.

## 5. SRN-3: the Teardrop junction and the HWTWRP construction access (WA010002)

This section draws on Southern Water's own Transport Assessment and Construction Traffic Management Plan for the Hampshire Water Transfer and Water Recycling Project (HWTWRP), currently accepted for examination as a Nationally Significant Infrastructure Project (ongoing [Planning Inspectorate case WA010002](#)).

Southern Water's HWTWRP proposes a Water Recycling Plant immediately south-east of the A3(M)/A27/A2030 Broadmarsh junction - SRN-3 in this document, and in reality a dumbbell roundabout arrangement spanning both the north and south sides of the A27, rather than the single loop the 'Teardrop' name might suggest. The scheme's own Construction Traffic Management Plan identifies a temporary construction access directly onto the A27 eastbound on-slip at this junction, raised with National Highways on 14 April 2025 and, so far as Havant Civic Society is aware, still open; National Highways' only recorded engagement with the scheme remains this single access question. The scheme's Underground Pipeline is confirmed to pass beneath the A3(M) in the vicinity of Junction 5, and beneath the A27(T) adjacent to Junction 5 at Broadmarsh (Section 3.3) - construction that will therefore run directly beneath the SRN-3 junction cluster addressed throughout this document.

The image below illustrates SRN-3, the HWTWRP site, and Harts Farm Way's connection eastward toward SRN-4 and the Solent Road Retail Park.



Harts Farm Way - the link connecting the Broadmarsh/Teardrop junction to the Langstone Technology Park and, beyond it, to Solent Road - carries the highest percentage traffic impact of any link surveyed in the scheme's preliminary construction traffic table (Table 6-6): a forecast rise from 9,995 to 10,535 vehicles per day (+5.4%) and from 2,394 to 2,487 HGVs per day (+3.9%), against every other surveyed link at 3.2% or below. The Transport Assessment's own narrative describes construction traffic impacts as 'relatively minor on the majority of links' - a description Harts Farm Way is the exception to, not an example of. This is now the third instance in this document of a scheme's own headline framing understating its worst-case figure, after the Downley Road (APP/24/00606) and Portsmouth Water HQ (APP/21/00601) transport assessments.

The scheme's own automatic traffic counts (Thursday 17 October 2024) show why: at two survey points on Harts Farm Way, HGVs already account for 11.3%–14.1% of two-way daily flow (4,581–5,718 vehicles per direction, including 545–765 HGVs), and at Southmoor Lane,

immediately south of Harts Farm Way, HGV shares rise as high as 17.4%–17.6% of a smaller but still substantial flow (1,916–2,098 vehicles per direction). The westbound afternoon peak at both Harts Farm Way survey points falls at 1400–1500, not at a conventional evening rush hour - a pattern more consistent with commercial and logistics traffic than pure commuting, though the underlying survey data records vehicle class and time of day only, not journey purpose, and this document does not assert a firm explanation for it.

In Havant Civic Society's own observation, Harts Farm Way also serves as a relief route between the A27, central Havant and the Solent Road retail park; this characterisation is not itself drawn from the HWTWRP Transport Assessment, whose survey methodology does not record trip purpose.

The same Transport Assessment's own baseline road-safety review records a cluster of two slight and two serious injury collisions, drawn from the DfT's Personal Injury Accident dataset, at the roundabout where Harts Farm Way meets Brockhampton Road, Brookside Road and Southmoor Lane - the same junction through which the bulk of HWTWRP construction traffic would route to reach the site.

HWTWRP is not a Havant Borough Council planning application, and its Development Consent Order examination has no mechanism for weighing its own contribution to SRN-3 against the cumulative effect of Campdown, Southleigh, DPO1/DBN5, the Lidl store, or Rook Farm - each addressed elsewhere in this document. It is, in that respect, a fourth process alongside HBC, HCC Highways and National Highways' own application-by-application engagement that is structurally unable to see the cumulative picture this document sets out to fill.

## 6. SRN-4: the A3023 corridor and the Rook Farm appeal (APP/21/01434)

Application APP/21/01434 (Rook Farm, land off St Mary's Road, Hayling Island – outline application for up to 300 dwellings) was first submitted in 2021. Havant Borough Council did not determine the application within the statutory period; the applicant, Barratt Homes, appealed for non-determination (Council Appeal Ref AP-0373, Appeal Registered 6004299). A four-day Planning Inspectorate inquiry was held on Hayling Island, with closing statements heard on 30 June 2026. The Inspector's decision remains pending as of this document.

Inquiry evidence and resident testimony put before the Inspector establish two related mechanisms bearing on SRN-4. The first is a capacity-backup mechanism: peak and summer holiday, beach-bound traffic routinely saturates the A3023 corridor back to the Havant/A27 interchange, displacing traffic onto informal local rat-runs. The second is a closure-risk mechanism: flooding at the Northney Road junction and at Langstone Bridge's southern approaches has previously obstructed the route entirely, with an April 2024 flood event cited at the inquiry in which emergency vehicle access was reportedly prevented.

These points were contested at the inquiry. For the appellant, Melissa Murphy KC argued that flood risk at Langstone Bridge was "low" on the best available data, and noted that neither the Environment Agency nor Hampshire Fire and Rescue Service had objected – while conceding that the A3023 is a "sensitive" stretch of road. HIRA's transport evidence, given by Professor Jonathan Raper, was challenged by the appellant on grounds of independence. Havant Civic Society takes no position on which case the Inspector should prefer; both are recorded here as contested evidence, not as established fact.

Whatever the Inspector's eventual finding on flood risk specifically, this is a live, evidentially-tested example of the same single-point-of-failure pattern already identified elsewhere in this document at SRN-5: a junction or corridor with no adequate alternative route, on which multiple, independent forms of disruption converge. See also the following section on the structural condition of the Park Road North railway bridge and the Langstone Bridge (A3023), which raises a related but independent risk to the same corridor.

## 7. Single points of failure: the structural condition of Park Road North railway crossing and Langstone Bridge (A3023)

The resilience point above concerns closures caused by traffic incidents on the SRN itself. A related but distinct risk arises from the physical condition of the structures that carry Havant's own scarce road connections – across the rail line that bisects the borough, and to Hayling Island – since deterioration or unplanned closure of either would remove capacity from routes this document has already shown to have no adequate alternative.

Park Road North carries the road over the Portsmouth–London main line between Havant and Bedhampton stations. In Havant Civic Society's understanding, and setting aside rat-running traffic toward SRN-5 or SRN-3, this is the borough's primary north–south route, the primary route from north Havant through to Hayling Island, and the primary access route to the New Lane industrial/employment estate – the site of Amazon DPO1. Network Rail's most recently published Bridge Detailed Examination for this structure (Struc. Ref 17/271, dated 28 February 2021) records the overall condition of the main structural elements as "Fair", with drainage rated "Poor", and identifies numerous longstanding defects – spalled concrete with exposed, corroding reinforcement in deck and girder elements, and multiple wingwall, buttress and parapet fractures, several newly recorded at that examination. No urgent closure was recommended, and the identified works are categorised as routine monitoring and scheduled repair rather than emergency action. This report is now over five years old relative to this document's preparation, and Havant Civic Society is not currently aware whether a more recent detailed examination has superseded it.

Langstone Bridge (A3023) is the sole road access to and from Hayling Island, and its condition has now been addressed directly by Hampshire County Council's own Leader. In a letter dated 5 June 2026 – sent to leaders of residents' groups and other local residents opposed to the Rook Farm development (APP/21/01434) – Cllr Nick Adams-King describes the bridge as providing "the only road access to and from Hayling Island" and as "one of the most strategically important transport assets within Hampshire". The letter states that the bridge "now requires intervention" and that it is "essential to implement very substantial repair and strengthening measures" to secure its long-term serviceability. Funding for the scheme is not yet secured: the County Council is bidding into the Department for Transport's Structures Fund, and the letter seeks written support for that bid. The letter also confirms that engineers intend to maintain at least one lane throughout construction – an acknowledgement that the refurbishment itself will impose an extended capacity constraint on the sole access route, over and above the capacity-backup and flood-closure risks already put in evidence at the Rook Farm inquiry.

Taken together, these two structures mean that Havant's connectivity to Hayling Island, and Amazon DPO1's own primary access corridor, both currently depend on ageing infrastructure with documented, unresolved condition issues – independently of, and in addition to, the traffic-incident closure risk raised above and the contested capacity and flood-risk evidence

raised at the Rook Farm inquiry, on which the Planning Inspectorate's decision remains pending.

## 8. National Highways - Engagement with the HBC/HCC Highways planning process

National Highways are not routinely engaged as a 'statutory consultee' on HBC planning applications unless a clear and obvious impact on the strategic road network is perceived by the local authority case officers.

HBC Planning Services regularly approve planning applications where transport documentation conceals incomplete and misleading information within high volumes of text, often running to hundreds of pages. The reluctance to challenge the unacceptable quality of submitted documentation can result in substantial financial and schedule overruns for both the local planning authority and the applicant.

Detailed analysis of supporting transport documentation is delegated to HCC Highways, where officers appear to concentrate on technical details without appreciating the broader local context well-known to those who regularly use the affected roads.

Public efforts to engage with HBC and HCC Highways planning officers concerning traffic generation have consistently been unsuccessful, exposing significant procedural deficiencies both within and between the two tiers of local government. These shortcomings provoke heightened public opposition, further prolonging delays in the delivery of substandard development projects.

A dated illustration of this pattern, distinct from the SRN cumulative-impact case set out elsewhere in this document, is available from Havant Borough Council application APP/21/00601 (Portsmouth Water new headquarters, Solent Road). Third-party correspondence<sup>5</sup> raising detailed, numbered questions about the Transport Assessment's baseline survey methodology – including the location of the reference traffic counter used to derive a "Coronavirus factor" and the omission of trip generation associated with an existing NHS medical practice and pharmacy sharing the site access – went without a substantive response from either HBC or HCC Highways for over thirteen months (2 May 2024 to 26 June 2025), surfacing only in reply to a public deputation at Planning Committee. When HCC Highways did respond, it confirmed that the medical practice's own floorspace was unknown and that its trip-generation comparator had instead been drawn from a health hub roughly three times the likely size ("Given that the square footage of the medical centre is unknown, I have therefore utilised the TRICS database...") – a concrete instance of the generic-model-versus-observed-reality gap raised at Question 4 below. A related "ransom strip" objection concerning the same access was met by HCC Highways with "This matter is not for us to respond to but is a planning matter", and does not appear to have been substantively addressed by HBC Planning Services either – left unresolved in the gap between the two tiers this section describes.

## 9. National Highways correspondence, March–April 2025

A separate document with smaller scope setting out a four-junction framework (the precursor to the six-junction SRN-1–SRN-6? framework used above) was sent to National Highways on 23 March 2025, addressed to Beata Ginn, Patrick Blake and the Planning SE team, and copied to

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<sup>5</sup> See exchange of files between Bosmere Medical Practice and HCC Highways on [the APP/21/00601 case file](#).

Havant Borough Council (Lyall Cairns, Wayne Layton), Hampshire County Council (Lulu Bowerman) and ward councillors Phil Munday and Richard Brown. It posed nine questions, corresponding to Questions 1–9 in Section 15 of this current document.

National Highways – Beata Ginn – replied in full on 11 April 2025, within three weeks, answering all nine questions. Key points from that response:

**Q1:** National Highways’ engagement is a statutory duty under Schedule 4 of the Town and Country Planning Act 1990, not a discretionary courtesy.

**Q2:** “in some instances, due regard should be had to permissions and allocations in neighbouring authorities” when assessing cumulative impact – directly relevant to the Chichester A259-corridor loading on SRN-5 discussed above.

**Q3:** The confirmed escalation channel for public concerns is [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

**Q4 & Q5:** answered only in general methodological terms, without directly engaging the specific TRICS-versus-observed-reality and 24/7 logistics-versus-fixed-peak-hours points raised – these remain open and worth a direct follow-up.

**Q6:** Committed development must be factored into assessments even before construction is complete.

**Q7:** Section 73 applications, such as the one that removed DPO1’s traffic management conditions, are treated like any other application, per DfT Circular 1/22 and the NPPF.

**Q8:** National Highways confirmed active collaboration with local authorities on cumulative SRN impact through the Local Plan process.

**Q9:** correctly noted as a question aimed at HBC/HCC rather than National Highways.

By contrast, Havant Borough Council and Hampshire County Council – despite being copied to named senior officers and portfolio councillors – have never replied. That silence is now over a year old. This asymmetry – National Highways answering substantively within three weeks; HBC and HCC not answering at all – is itself a documented, dated fact directly evidencing the “observable gaps in process between the two tiers of the local planning authority” already identified above.

A follow-up was sent on 14 May 2025, forwarding National Highways’ response in full, this time also copied to David Hayward (HBC Planning Policy Manager) and Cllr Gillian Harris, then Chair of the Amazon DPO1 Community Liaison Panel and a local ward councillor – a role with direct oversight relevance to the traffic-management concerns raised in this document. No response was received to that follow-up either.

A further point raised on 14 April 2025, and still unresolved, concerned a proposed Southern Water wastewater project (part of the Havant Water Treatment Works Reinforcement Programme) seeking a temporary construction access directly onto the A27 eastbound on-slip between A3(M) SRN-3 and the A27, pursued as a Nationally Significant Infrastructure Project decided by Development Consent Order through the Planning Inspectorate – a process outside the normal HBC/HCC route.

## 10. Recent HBC planning applications with SRN impact

The following table outlines twenty-one significant planning applications and infrastructure projects validated or registered over a nine-year period since 2017. Each of these would be expected to have a measurable impact on the six strategic road network junctions that connect Havant to the wider national road network, and yet eight of them appear not to have included National Highways as a statutory consultee.

This is not an exhaustive list.

| Ref # | HBC Planning reference<br>( <a href="#">Direct HBC Planning links</a> ) | Description                                                                                                                                                                                                                                                                                                                 | National Highways engagement                                                                                                                                | Map Ref. | Status                                          |
|-------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------|
| 1     | <a href="#">APP/18/00450</a>                                            | 320+ dwellings at 'Forty Acres', 100m west of Junction 5, Rusty Cutter roundabout.                                                                                                                                                                                                                                          | No objection raised (Patrick Blake), subject to pedestrian improvements at the J5 Rusty Cutter roundabout which are currently in progress.                  | A        | Part occupied                                   |
| 2     | <a href="#">APP/18/01033</a>                                            | 69 dwellings east of Castle Avenue.                                                                                                                                                                                                                                                                                         | No objection raised (Beata Ginn)                                                                                                                            | B        | Occupied                                        |
| 3     | <a href="#">APP/19/00007</a>                                            | Development near Bartons Road, north-east of the main Havant SRN cluster (marker O). Cited in the Southleigh applicant's Transport Assessment (§10.4.3, 'Committed Development') as background traffic.                                                                                                                     | No objection (Beata Ginn) quoting 'Highways Act Section 175B is not relevant to this application'                                                           | O        | Under construction, Part occupied               |
| 4     | <a href="#">APP/19/00660</a>                                            | Redevelopment of former Butterick factory to provide new warehousing and distribution units.                                                                                                                                                                                                                                | <b>No engagement noted</b>                                                                                                                                  | C        | Completed and operational                       |
| 5     | <a href="#">APP/19/01226</a>                                            | Land west of Coldharbour Farm Road, Emsworth (Marker P). Routes via Emsworth Road, east of the Southleigh/Bloor Homes site, then west along the A259 to join the SRN at SRN-5 (Warblington interchange). Cited in the Southleigh applicant's Transport Assessment (§10.4.3, 'Committed Development') as background traffic. | Engaged – Comments relate to drainage and screening of noise and light from the A27.                                                                        | P        | Approved                                        |
| 6     | <a href="#">APP/20/00441</a>                                            | Outline approval for up to 120 dwellings alongside the A3(M) on Hulbert Road, 350m north of the Asda roundabout.                                                                                                                                                                                                            | No objection raised (Beata Ginn)                                                                                                                            | D        | Approved                                        |
| 7     | <a href="#">APP/20/01221</a>                                            | New 'flagship' Lidl supermarket adjacent to the A3(M), accessed from the B&Q mini roundabout between Junction 4 and the Asda Roundabout. The new store is described as a 'flagship' store... the first of its kind on the south coast, featuring a larger and more sustainable design.                                      | Engaged (as Highways England) – response filed February 2021 but mislabelled on the planning file as a county response; corrected on review, 24 March 2025. | E        | Constructed and opened for business March 2026. |

| Ref # | HBC Planning reference<br>( <a href="#">Direct HBC Planning links</a> )                                                               | Description                                                                                                                                                                                                                                                                                                                                                                                           | National Highways engagement                                                                                                                                                                                                         | Map Ref. | Status                                                                                          |
|-------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------|
| 8     | <a href="#">APP/21/00200</a>                                                                                                          | Amazon DPO1 last mile delivery station servicing the Southampton to Chichester urban corridor.                                                                                                                                                                                                                                                                                                        | <b>No engagement noted</b><br><i>(See also the APP/21/01244 entry below, and the detail in Section 11)</i>                                                                                                                           | F        | Developed and operational but not yet running at designed capacity.                             |
| 9     | <a href="#">APP/21/00601</a>                                                                                                          | Planning application by Portsmouth Water for development of new HQ. This will enable the applicant and HBC to capitalise on existing HQ site, specified in Local Plan as Allocation 12.                                                                                                                                                                                                               | Offered no objection<br>“Highways Act 1980 Section 175B is not relevant to this application”                                                                                                                                         | N        |                                                                                                 |
| 10    | <a href="#">APP/21/00893</a>                                                                                                          | Not shown on the map (lies just east of the mapped area). SRN routing via Southleigh Road, Horndean Road then west along the A259 to join the SRN at SRN-5 (Warblington interchange). Cited in the Southleigh applicant’s Transport Assessment (§10.4.3, ‘Committed Development’) as background traffic.                                                                                              | <b>No engagement noted</b>                                                                                                                                                                                                           | –        | Currently in Local Plan as ‘Allocation 2’ (indicative yield - 320 houses)                       |
| 11    | <a href="#">APP/21/01010</a>                                                                                                          | 184 dwellings east of St Georges Avenue.                                                                                                                                                                                                                                                                                                                                                              | No objection raised (Beata Ginn)                                                                                                                                                                                                     | G        | Unclear                                                                                         |
| 12    | <a href="#">APP/21/01244</a>                                                                                                          | Amazon DPO1 – Section 73 application to counter traffic management planning conditions.                                                                                                                                                                                                                                                                                                               | <b>No engagement noted</b>                                                                                                                                                                                                           | F        | Approved                                                                                        |
| 13    | <a href="#">APP/21/01434</a>                                                                                                          | Rook Farm, land off St Mary’s Road, Hayling Island – outline application for up to 300 dwellings. Not determined by HBC within the statutory period; appealed by the applicant (Barratt Homes) for non-determination (Council Appeal Ref AP-0373, Appeal Registered 6004299). Four-day Planning Inspectorate inquiry held on Hayling Island; closing statements heard 30 June 2026; decision pending. | Engaged since 15 Feb 2022. Recommended non-determination until 3 Sept 2025 (12 June 2025); no objection given 9 Sept 2025, but conditional on submitted information – modelling shared with APP/22/0001, APP/21/01351, APP/21/01350. | R        | Outline application; Inspectorate decision pending (post-inquiry, awaiting Inspector’s report). |
| 14    | <a href="#">APP/21/01451</a><br><br>(Note – incorrectly referred to in APP/26/00324 ‘Committed Development’ section as ‘APP/17/0063’) | Southleigh House (marker Q). Cited in the Southleigh applicant’s Transport Assessment (§10.4.3, ‘Committed Development’) as background traffic.                                                                                                                                                                                                                                                       | <b>No engagement noted</b><br><br>See Question below regarding NH consultation on smaller committed developments cited in the Southleigh TA.                                                                                         | Q        | Decision to Approve 15/5/2025                                                                   |
| 15    | <a href="#">APP/22/00669</a>                                                                                                          | Development of 120 dwellings at Kingscroft Farm.                                                                                                                                                                                                                                                                                                                                                      | <b>No engagement noted</b>                                                                                                                                                                                                           | H        | Approved                                                                                        |

| Ref # | HBC Planning reference<br>( <a href="#">Direct HBC Planning links</a> )   | Description                                                                                                                                                                                                                                                                                                                                                                                     | National Highways engagement                                                                                                                                                                                                                               | Map Ref. | Status                                                                                                                                                                                        |
|-------|---------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16    | <a href="#">APP/22/01231</a>                                              | Development of 83 dwellings at Palk Road.                                                                                                                                                                                                                                                                                                                                                       | <b>No engagement noted</b>                                                                                                                                                                                                                                 | I        | Planning decision expected soon.                                                                                                                                                              |
| 17    | <a href="#">APP/23/00488</a><br>See also:<br><a href="#">APP/19/01101</a> | Development of 628 (590) dwellings at Campdown.                                                                                                                                                                                                                                                                                                                                                 | Engagement ongoing (Beata Ginn, previously Patrick Blake)                                                                                                                                                                                                  | J        | Permission recommended withheld by National Highways (NHPR 25-01, 10 Apr 2026) until 9 October 2026, pending outstanding traffic models                                                       |
| 18    | <a href="#">APP/24/00606</a>                                              | Development of new B8 warehousing and logistics operation at 8 Downley Road. The Transport Assessment predicted generation of 707 movements/day, a real increase of 500+ over the observed previous occupation. TA used TRICS data to inflate 'previous trip generation' data - the same planning consultant and transport consultancy (SLR, formerly Vectos) used for DPO1's 2021 application. | <b>No engagement noted</b>                                                                                                                                                                                                                                 | K        | Approved                                                                                                                                                                                      |
| 19    | <a href="#">APP/26/00324</a>                                              | Bloor Homes, 1,800 homes at Southleigh strategic site                                                                                                                                                                                                                                                                                                                                           | Engaged pre-application; general support expressed for 'vision and validate' methodology, assessed impact as primarily on local network rather than SRN. No confirmed engagement found on Warblington Interchange signalisation design approval – see Q10. | L        | Received 12 May 2026; validated 3 June 2026. EIA development (Environmental Statement submitted). Delegated decision track; scheduled decision 23 September 2026.                             |
| 20    | Draft Local Plan Allocation 29                                            | <i>Interbridges West – draft Local Plan allocation.</i>                                                                                                                                                                                                                                                                                                                                         | <b>Unknown</b>                                                                                                                                                                                                                                             | M        | Allocated in the Draft Local Plan for employment use. Public feeling is that the site, currently shared with existing A27 Emsworth Services, should be reserved for A27 access investigation. |

| Ref # | HBC Planning reference<br>( <a href="#">Direct HBC Planning links</a> ) | Description                                                                                                                                                                                                                                                                                                                      | National Highways engagement                                              | Map Ref. | Status                                                                                                                                        |
|-------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| 21    | N/A - NSIP/DCO, <a href="#">PINS ref WA010002</a> <sup>6</sup>          | Southern Water Hampshire Water Transfer and Water Recycling Project (HWTWRP): proposed water recycling plant, High Lift Pumping Station, and associated excavation, piling and tunnelling beneath the A27 and A3(M), within a former 'dilute and disperse' landfill site that lies within 120m of the A27 westbound carriageway. | <b>Partial engagement</b> - proposed eastbound A27 slip road changes only | S        | Registered with the Planning Inspectorate as a Nationally Significant Infrastructure Project (NSIP) in June 2026, under limited consultation. |

Four of the entries above (APP/21/01451, APP/19/00007, APP/19/01226 and APP/21/00893) do not represent new local planning concerns; they are cited by the Southleigh applicant's own Transport Assessment, at paragraph 10.4.3 under 'Committed Development', as part of the background traffic against which Southleigh's own cumulative impact was assessed. Given the individual scale of APP/19/00007 and APP/21/01451, it seems unlikely that National Highways was separately consulted on either as a standalone application – though this has not been verified against the planning portal's consultee list. If that assumption is correct, the cumulative SRN contribution of these two developments may never have been assessed by National Highways directly, only inherited indirectly via the figures embedded in the Southleigh Transport Assessment's own background growth modelling.

## 11. Illustration - Amazon DPO1 - APP/21/00200 and APP/21/01244

The case of HBC planning application (APP/21/00200) highlights the significant current shortcomings in the transport planning process at both tiers of the local planning authority.

HBC Planning Services accepted the applicant's demand for occupier anonymity and the scope of the proposal was represented on the planning file simply as '*a last mile delivery operation delivering to local addresses in the Havant area*'. In the detail, however, it was clear that 95% of the traffic generated would be heading to and from the SRN. It was also plainly obvious to informed members of the public that the drawings submitted with the application bore the clear architectural fingerprint of an Amazon MSVP<sup>7</sup> delivery station.

Amazon's original request had been to develop this operation at [Dunsbury Park](#), adjacent to A3(M) Junction 3, but this opportunity had been turned down by the site's owner (Portsmouth City Council). To secure the development, Havant Borough Council as the planning authority and business rate recipient offered the company an alternative site at 32 New Lane, PO9 2NG, at site 'F' on the map.

This location of this former town centre manufacturing location, accessible only through residential streets, combined with the innocuous planning application summary, masked the

<sup>6</sup> Unlike Ref #1–20 in the table above, this is not an HBC planning reference: it is a Nationally Significant Infrastructure Project examined by the Planning Inspectorate under a Development Consent Order, not by Havant Borough Council. It is included here because of its direct construction-access and cumulative-impact relevance to the SRN-3 junction cluster addressed throughout this document (see Section 5).

<sup>7</sup> Multi-Storey Van Parking

significant impact that the intended business operation would have on Havant's core SRN junctions (SRN-2–SRN-5) and the surrounding roads.

Amazon DPO1, the largest of the company's delivery stations in the south of England, has now been in operation for three years and the impact on the local roads and SRN junctions that had been predicted by concerned local commentators at the planning stage, is clearly visible.

Planning approval was given, conditional on local authority monitoring of the site's operational management and traffic generation. However, these conditions were removed prior to development by a separate application (APP/21/01244) submitted by the applicant under Section 73 of the Planning Act and rushed through the planning process by HBC under pressure from the applicant.

As the Amazon operation at DPO1 ramps up operational volumes to its designed capacity, there are currently no controls in place to manage the future growth in traffic generation by the site's operators, increasing the risk to efficient operation of the SRN at the junctions identified above.

The use of anonymity by Amazon's retained planning and transport consultants is an approach which has been witnessed in similar planning applications to multiple local authorities throughout the UK. While the approach is rooted in the applicant's understandable desire to maintain commercial confidentiality in a competitive market, when applications are further camouflaged by deliberate obfuscation of the planning documentation as was the case with APP/21/00200, the integrity of the planning process is compromised.

National Highways were not engaged at all with the application and those statutory consultees that were, lacked sufficient information to provide an informed and meaningful response. Once the identity of the occupant was finally revealed, Hampshire and Isle of Wight Fire and Rescue Service noted that *"the risks associated with such a building are very different to the risks associated with typical logistics buildings"*.

## 12. The Havant draft Local Plan and A27/A259 connectivity requirements

The draft Local Plan contains provision for circa 2000 new dwellings in the 'Southleigh Gap', immediately to the east of the border of the map. Without prerequisite development of the long-overdue link road between Bartons Road in the north and a redesigned A27 Warblington interchange (SRN-5 on the map), the additional load on that already-stretched junction will be significant. Development of the Southleigh Link Road would also go some way to providing relief for the SRN traffic generated by recent HBC commercial planning decisions for the sites at New Lane and Downley Road, map references C, F and K.

The Warblington junction is now further strained by commercial traffic using east Havant's residential streets as a rat-run to and from the commercial redevelopment of the North Havant Industrial Estate at New Lane and Downley Road which now favours change of use to B8, attracting traffic-intensive warehousing and logistics operations. The Amazon HGV and LGV traffic between the company's DPO1 delivery station and its more recently opened DBN5 delivery station at Bersted on the A259 provides an example; both sites are high impact traffic generators.

The Downley Road consent was approved on 20 February 2025, the same day Havant Civic Society made a deputation to Planning Committee objecting to it on this ground. Approval was granted with parking provision below the council's own stated requirement, and with a £50,544 developer contribution directed toward bus stops and pedestrian/cycle infrastructure rather

than traffic capacity or monitoring; a planning officer confirmed at committee that funding measures such as ANPR enforcement cameras is a matter for Hampshire County Council, not the applicant - the same division of responsibility raised elsewhere in this document in relation to the DPO1 Section 73 conditions.

Further afield, it is worth noting that the Amazon DBN5 planning application was another anonymised planning application raised on behalf of the company as [AL/87/21/PL](#), and approved by Arun District Council with National Highways consultee input from David Bowie. The Agency's officer took issue with the transport consultant<sup>8</sup> regarding the predicted loading on the sensitive A27 Bognor junction.

The load on the A27/A259 Warblington junction from new housing developments approved by Chichester District Council is further complicated by the fact that the borough and district councils have different county Highway authorities.

The problems associated with the strategic road network around Chichester are well known and well publicised, but the equivalent issues to the west and north of the Warblington junction, notably the other junctions discussed above, are no less worrying, see question 8, below.

### 13. Illustration – Southleigh (APP/26/00324) and the Warblington Interchange

The current outline application for up to 1,800 dwellings at Southleigh (APP/26/00324, validated 3 June 2026) illustrates, at a much larger scale, many of the same structural concerns raised above regarding Amazon DPO1 – and it engages SRN-5, the A27 Warblington interchange, directly.

The Transport Assessment's own junction capacity modelling shows the Emsworth Road/Southleigh Road/Pook Lane junction – which sits on a link screened out of the Environmental Statement's assessed study area because the modelled traffic-flow increase falls below the standard IEMA threshold – collapsing to between minus 33% and minus 41% Practical Reserve Capacity once development traffic is added, with the applicant's own consultant stating that "no immediately available mitigation scheme is clear". This is a clear illustration of the gap this document has already identified between link-based screening tests and junction-level capacity reality.

Two further junctions on the same corridor – Horndean Road/Bartons Road and Horndean Road/Southleigh Road – remain over capacity in the AM peak under every scenario tested by the applicant, including the most optimistic, even after the proposed signalisation mitigation. Both junctions were already recorded as over capacity at the 2038 future baseline before any Southleigh traffic is added – a pre-existing constraint the development compounds rather than solely creates, consistent with the pattern already observed at SRN-2 and SRN-3 above.

The applicant's mitigation scheme for the Warblington interchange itself does show full capacity resolution when modelled in isolation. However, nothing found in the submitted Transport Assessment appears to separately identify or quantify the cumulative loading on this junction from (a) Chichester District Council's committed housing pipeline along the A259 corridor, (b) Amazon HGV and LGV movements between DPO1 and DBN5, or (c) informal

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<sup>8</sup> The transport consultant for both DPO1 and DBN5 was, Vectos, now part of SLR Consulting. The supporting documents for DBN5 and DPO1 contain significant duplication, in both cases misleading.

overflow traffic diverted from the Langstone interchange (SRN-4) when it saturates – despite this document already noting, above, that A259-corridor development places significant strain on this same junction. See Question 10, below.

The long-overdue Southleigh Link Road, referenced earlier in this section, remains undelivered. The applicant's own Environmental Statement confirms that a previously-considered pedestrian and cycle bridge at the Southleigh Road level crossing is "no longer a funding priority for HBC or HCC", and no vehicular link between Bartons Road and a redesigned Warblington interchange forms part of the current proposal.

New Lane and Petersfield Road – which, in Havant Civic Society's assessment, represent the natural overflow routes from Southleigh toward the Warblington and Langstone A27 junctions – are not tested as diversion corridors anywhere in the Transport Assessment reviewed, echoing the rat-running concern already raised above regarding DPO1. The applicant's traffic baseline (June 2023) pre-dates both DPO1's expansion into Same Day delivery (confirmed November 2025) and the opening of DBN5 (March 2024).

Finally, as of the most recent engineering drawing revisions reviewed, the detailed mitigation scheme designs for all four off-site junctions affected – Horndean Road/Bartons Road, Horndean Road/Southleigh Road, Bartons Road/Eastleigh Road, and the Warblington interchange – remain marked as drafts for discussion rather than finalised for submission or construction. This raises a direct question as to whether finalised, construction-ready designs were included in the application as submitted, given that the capacity conclusions summarised above depend on these specific schemes being deliverable as drawn.

There is also a documented traffic linkage to SRN-5. Although DPO1's approved routing directs traffic via Crossland Drive, dated site monitoring – including a photograph taken on 20 January 2025 of a queue of loaded delivery vans at the New Lane railway crossing – records a material volume of DPO1 traffic instead using New Lane, Eastern Road, Fairfield Road and Beechworth Road to the south, reaching the SRN via the A27 Warblington interchange rather than the approved northern route. These are the same corridors this document has already identified, in the Southleigh Illustration section above, as unassessed overflow routes for Southleigh traffic under saturation at Langstone (SRN-4). This existing, unmanaged loading should be treated as background traffic when any future assessment of cumulative impact at SRN-5 is made.

#### 14. Actions required by the local planning authority

While the concerns raised in this document have been raised repeatedly by the public through public comments on the planning applications concerned, it has been unfortunate and frustrating to note that such comments raised by the public invariably fall unanswered into apparent gaps in responsibility between the HBC planning officers and the HCC Highways planning officers.

The examples shown in Section 10 demonstrate the need for more effective qualification of development proposals before they are declared 'valid' as planning applications.

1. Pushing back incomplete staff-work to the applicant at the pre-application stage would enable more accurate validation and drive better quality input to the planning system.
2. Strict qualification of incoming planning applications would save unnecessary effort by the LPA planning officers and ensure that the correct statutory consultees are fully

engaged and presented with a complete set of validated facts.

3. By ensuring that planning applications are not published until the content provided by the applicants has been fully qualified and verified, a significant amount of public effort would be saved and with it, a measurable amount of local authority planning administration time.

The following section contains nine questions which explore the need for improvements to process improvement across the multiple tiers of highway planning, including National Highways and the local planning authority services provided by Havant Borough Council and Hampshire County Council Highways.

## 15. Questions aimed at closing the traffic planning gaps

**Question 1** – What are the criteria which mandate National Highway’s engagement as a statutory consultee on a local authority planning application? How could these criteria become more effective in challenging local planning decisions which impact the SRN?

**Question 2** - Local authorities consider each planning application in isolation rather than in a realistic location context. What safeguards are there to account for the real increase in actual SRN junction loading caused by the cumulative traffic generation from multiple developments?

**Question 3** – When the local authorities planning officers ignore public concern about the safe and efficient operation of the Strategic Road Network without explanation, in cases such as the Amazon DPO1 development, what formal channel is there through which the public can escalate such concerns to National Highways?

**Question 4** – Transport assessment documentation submitted with planning applications often use generic data models (e.g. TRICS) to demonstrate ‘zero’ or ‘negative’ net change in traffic generation<sup>9</sup>, to exploit the proposed site’s historic ‘maximum traffic generation’ permits. However, local knowledge and observation often demonstrate that the opposite is true. Where in the process is there a verification check that these theoretical models correctly reflect the reality of observed road use? This question is particularly relevant in the case of long derelict brownfield sites where historic maximum use permits are surely irrelevant?

**Question 5** – The fixed definition of peak AM and PM hours used in planning submissions are increasingly irrelevant where 24/7 warehousing, logistics and household delivery traffic is involved. What safeguards are there to ensure that real operational peak load is properly accounted for?

**Question 6** - Given the long delays we are seeing between the raising of planning applications and their conversion into delivered developments, would you agree that there is a case for revisiting potentially outdated National Highways consultations as the location context changes due to subsequent development proposals which impact the same SRN infrastructure?

**Question 7** - In Havant Civic Society's assessment, it is plausible that political directives, combined with Amazon's insistence on maintaining anonymity, constrained the recommendations of the HBC planning officers. Given the applicant’s well-known logistics model, scale and growth of operation and corporate planning approach of anonymity witnessed

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<sup>9</sup> [Havant Civic Society website article](#), 12 May 2025

at LPAs UK wide, had National Highways been consulted, would the agency have been able to veto the validation of the Section 73 planning application (APP/21/01244) which removed all effective controls over future traffic generation?

**Question 8** - Is there an active program of work at National Highways southeast linking the SRN issues on the A27 and A259 around Chichester to the SRN loading around Havant?

**Question 9** - A recent FOI request to HBC, 24-536, exposed the surprising fact that *“Members of staff in the Planning Service do not use a time recording system”*. Without such data recorded against significant planning applications, how is planning service effort and its associated costs measured, and how is process improvement currently managed at HBC and HCC?

**Question 10** – Does National Highways’ assessment of the Warblington interchange (SRN-5) in connection with application APP/26/00324 separately identify and quantify traffic arising from (a) committed Chichester District Council development along the A259 corridor, (b) Amazon DPO1/DBN5 HGV and LGV movements between the two delivery stations, and (c) overflow traffic diverted from the Langstone interchange (SRN-4) when it is saturated – or are these absorbed within the DfT’s TEMPro/NTEM background growth factors applied uniformly across the study area, given the structural gap in that dataset’s treatment of gig-economy freight and delivery trips described above?

**Question 11** – Given the documented pattern of unmanaged and unmonitored traffic routing at Amazon DPO1 (see the traffic linkage noted above), what assurance can HBC and HCC Highways provide that any routing, monitoring and community liaison conditions attached to Southleigh (APP/26/00324) will be drafted to be enforceable from the outset, rather than relying on post-consent enforcement action which the DPO1 precedent suggests the Council may be reluctant, or practically unable, to take?

## 16. Summary and requests to National Highways

This document has set out a single, linked case rather than two independent ones: Havant’s SRN connections are structurally constrained, the resulting gaps in inter-authority coordination are already documented and dated, and Southleigh would compound at scale a problem Campdown already illustrates. On that basis, National Highways is respectfully asked to:

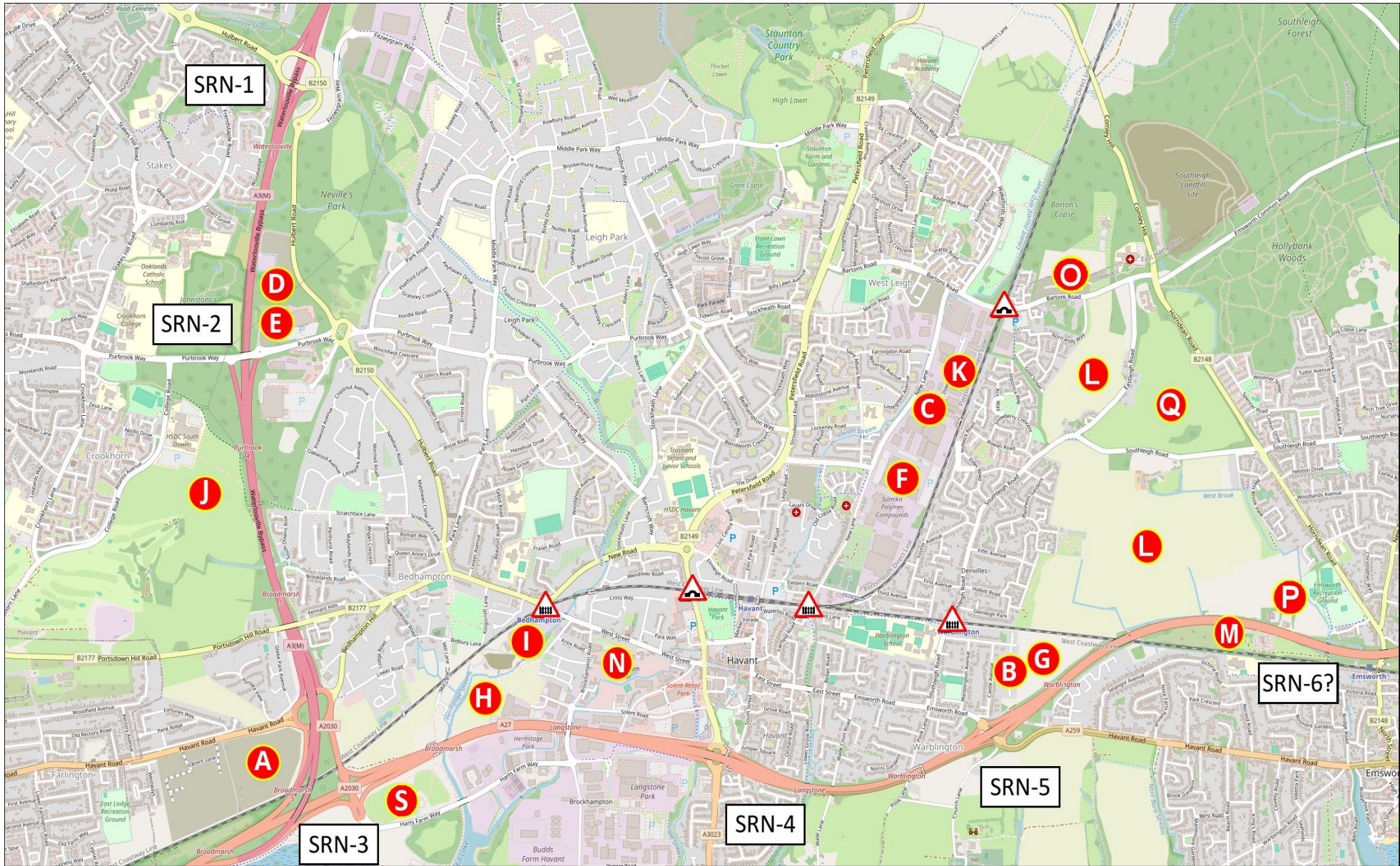
- (a) treat this document as a single submission relevant to both the Campdown (APP/23/00488) and Southleigh (APP/26/00324) case files, and confirm receipt against each reference;
- (b) maintain the NHPR 25-01 recommendation that permission not be granted for Campdown until the outstanding traffic models are received and reviewed, and treat the near three-year delay in receiving them as relevant context for any further extension request;
- (c) confirm whether the cumulative loading on the A27 Warblington interchange (SRN-5) from Southleigh, committed Chichester District Council development on the A259 corridor, and Amazon DPO1/DBN5 HGV and LGV movements has been, or will be, separately quantified rather than absorbed within generic background growth factors (see Question 10 above);
- (d) confirm whether the net-zero and modal-shift standing advice set out in NHPR 25-01 has been, or will be, applied consistently to the assessment of Southleigh, given the absence of any direct SRN junction access at that site; and

**(e)** advise on the appropriate formal channel, if any, through which the concerns in this document can be escalated should HBC and HCC Highways continue not to respond substantively, consistent with the year-long silence already documented above; and

**(f)** confirm which TEMPro/NTEM dataset and vintage underpins the traffic forecasting used in the assessment of Southleigh at the SRN-5 Warblington interchange, and whether any bespoke local adjustment was made to account for Amazon DPO1/DBN5 HGV and LGV freight movements and gig-economy home-delivery growth, given the structural gap in that dataset described above.

## 17. Map of locations

Please refer to the map below for locations of junctions and proposed / actual development sites referenced in this document.



'R' - APP/21/01434, Rook Farm, Hayling Island (Note traffic modelling link **R** to further Hayling Island applications APP/22/0001, APP/21/01351 and APP/21/01350)