



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

From: Hermes Luli (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Havant Borough Council (FAO Kayleigh Taylor)
kayleigh.taylor@havant.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk
planning.development@havant.gov.uk

Council's Reference: APP/26/00408

Location: Plot 1 Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE

Proposal: Outline permission for the erection of a building for employment purposes with associated parking and landscaping. All matters reserved except access, layout parameters and scale parameters.

National Highways Ref: NH/26/16847

Referring to the re-consultation on a planning application dated 14 August 2026 referenced above, in the vicinity of the A3(M) that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

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

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

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

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

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

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

Signature:



Date: 3 September 2026

Name: Letty Askew

Position: Spatial Planner, Area 3

National Highways:

Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL
www.nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

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

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

National Highways are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the proposed development, in this case on the A3(M), particularly at Junction 3.

The proposals are for 0.96 ha employment floorspace with all matters reserved except for access and layout and scale parameters. The site is made ground located within Dunsbury Park, approximately 900m from A3(M) Junction 3. The development will be accessed via the existing roundabout on Fitzwygram Way.

Planning History

Dunsbury Park was previously the site of a Hybrid planning permission (APP/12/00338) which granted outline consent for employment development and a hotel with conference facilities, and detailed consent for a new access link road with bus gate to Woolston Road. Under this consent, B8 floorspace was restricted to 12,356 sqm. Variation of Condition applications were subsequently submitted to increase this limit to 18,534 sqm (APP/15/00732, granted in October 2015) and then to remove the restriction entirely (APP/17/01324, granted in December 2018).

A Reserved Matters planning application for development of employment uses and a hotel with conference facilities, together with landscaping, infrastructure, and associated works (APP/17/00866) was granted in November 2017. The time limit for submitting Reserved Matters applications under APP/12/00338 expired in 2024. Therefore, planning applications are required for development on the undeveloped plots.

Three applications relating to the overall Dunsbury Park site have now been submitted: APP/26/00408 (Plot 1 – this application), APP/26/00361 (Plot 4), and APP/26/00453 (Plot 6).

Previous response

National Highways provided a 'no objection' response to the initial consultation on this application on 02 July 2026.

Whilst we had previously requested further information in response to the consultation for APP/26/00361 on 26 June 2026, based on the information available at the time we had no concerns regarding the potential impacts of APP/26/00408.

However, on 07 July 2026, we were consulted on the application APP/26/00453. On our review of this application, we identified that the cumulative impacts of the three applications has the potential to impact significantly on A3(M) Junction 3. Therefore, we requested further information regarding individual and cumulative trip distributions. The applicant provided this information to us on 10 August 2026.

Response to reconsultation

Having reviewed the submitted information, National Highways has identified that a significant number of trips associated with the proposed developments are expected to affect the Strategic Road Network (SRN), specifically the A3(M).

In the assessed B8 Parcel Distribution Centre cumulative scenario, 271 two-way trips are forecast to interact with the A3(M) in the AM peak hour, increasing to 315 two-way trips in the PM peak hour. Given the scale of these movements and the cumulative impact of the Dunsbury Park applications, National Highways requires further assurance that the impacts on the SRN have been appropriately assessed and can be accommodated without a material effect on the operation and safety of the network.

As such, National Highways considers that one of the following approaches is required:

1. Traffic modelling of the A3(M), including Junction 3 and any other relevant SRN junctions affected by development traffic, to demonstrate that the additional trips associated with the Dunsbury Park developments would not result in a severe impact on the operation of the SRN; or
2. A planning condition restricting the permitted land uses at Plots 4 and 6 to exclude B8 Parcel Distribution Centre use, thereby removing the worst-case trip generation scenario which gives rise to the significant number of peak-hour trips interacting with the A3(M).

We welcome further discussions with the applicant/their consultants regarding which of the above options they wish to pursue.

Recommendation

National Highways recommends that the Local Planning Authority does not grant planning permission for the application (Ref: APP/26/00408) until 4 December 2026 to allow time for the submission of further information or agreement of an appropriate planning condition. This does not prevent the authority, if they so wish, to either refuse the application or agree an extension of time beyond 4 December 2026.

Standing advice to the local planning authority

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

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

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