Outlook

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FORMAL RESPONSE@2026 09 09 (NH/26/17157) Publication (Regulation 19) Building a Better Future Plan- Pre-consultation notification

[redacted]

Date Wed 2026-09-09 08:59

To Planning Policy and Urban Design <planning.design@havant.gov.uk>

[redacted]

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For the attention of: Planning Policy Team, Havant Borough Council

Proposal: Havant Building a Better Future Local Plan (Regulation 19 Consultation)

Our Reference: NH/26/17157

Dear Sir or Madam,

Thank you for inviting National Highways to comment on the Regulation 19 Havant Publication Building a Better Future Local Plan public consultation (the Publication Plan).

National Highways is responsible for the safety, reliability, and operational efficiency of the Strategic Road Network (SRN). In the case of Havant Borough Council, this comprises the A3(M) and A27. We have considered the Publication Plan, alongside the Strategic Transport Assessment and Infrastructure Delivery Plan in forming this response.

We engaged with the Plan at Regulation 18 stage and made comments on aspects of the Plan that we hope were useful in shaping the current Publication version of the Plan. The following comments are provided at this Publication Plan stage to advise on our view in regard the soundness of the Plan and, where of benefit, we make cross-reference to our Regulation 18 consultation response. For clarity we have no issues or comments to make in regard the legal compliance of the Plan.

General

As we identified at Regulation 18 stage, we can generally support the Publication Plan's overarching policies relating to the Vision, Development Strategy and Objectives, which seek to enable sustainable development and to support improvements to infrastructure in the borough. Therefore, we consider that the collection of general overarching polices are well-developed and defined and we do not seek to make any comment on these policies.

Housing need

At Regulation 18 stage, with a view to the housing need calculation undertaken at that time (standard method of 17,740 dwellings over the Plan period) and the 7,218 dwelling provided for within the Plan, we identified that we would look forward to receiving the final housing need calculation and allocations at a future stage of the consultation process. This was identified with the expectation that once the housing need, and any changes to the site

allocations that may arise, have been finalised that a future year assessment based on highway capacity will be performed and that consideration will be accorded to the respective impact on the SRN.

From viewing the Publication Plan Policy 6 and the general text surrounding that policy, we note that the assessment of housing need has calculated the need for 15,822 dwellings over the Plan period, with the Plan making provision for at least 7,087 dwellings. We recognise the work that the Council has done to identify sufficient developable and sustainable residential land and the identification that discussions have been had with surrounding authorities. National Highways will seek to engage with the Council, neighbouring local authorities and the development community to consider any implications that the emerging pattern of development has, be this

(i) any increase beyond the 7,087 dwellings provision within the Havant Publication Plan (noting the “at least” policy wording) or
(ii) any of the housing need being met in neighbouring authorities.

We will do so in the interest of ensuring that such development can be delivered with appropriate consideration of the SRN. Based on the provisions of the Plan, we do not consider this requires any policy edits and therefore are comfortable that the collection of policies in the Plan provide us with the ability to engage with development proposals in the future (as set out below).

Evidence base, Infrastructure Provision and Policy Requirements

At Regulation 18 stage, we were concerned that the Local Plan did not provide details or understanding of the impact to capacity of the transport network. We note that the transport evidence base in support of the Publication Plan has now been provided in the form of the Strategic Transport Assessment (STA) with the outcomes of the evidence base feeding into the Infrastructure Delivery Plan (IDP). We support the provision of this evidence base.

Having considered the detail of the STA, we would identify that:

- It is noted that National Highways has been involved during the preparation of the STA. As such we do not seek to make detailed comments on the methodology or approach at this time. We also note that the model utilised in the evidence base has been found to be sound at Examination in Public when used for neighbouring Local Plans.
- While the STA identifies that it was developed with reference to the intended allocations at Regulation 18 stage, it is noted that the changes to development yield provided at Regulation 19 stage would have minimal implications in relation to the validity of the STA assessment. Having considered the changes, we take the view that this is a reasonable consideration.
- We support the vision-led approach to the evidence base that moves away from placing a focus on capacity enhancements.
- The STA has analysed the impact of the Local Plan allocations across the borough, including at the SRN. Using the criteria adopted in the STA (and identified as being agreed with National Highways), we note that the A27 Warblington Interchange and the A27 / Harts Farm Way junctions are identified as being capacity hotspots, and for which intervention measures are identified. Specifically, at the Warblington Interchange, a proposed highway scheme is proposed that involves signalisation of elements of the junction amongst other aspects of alteration. We note that the outcomes of the modelling identify that the proposed measures result in there being no operational consequences at the SRN, but this will need to be confirmed as the more detailed site assessments and mitigation assessments are undertaken as the Plan is delivered.
- The STA document also identifies that:

(i) The assessment is focused on a vision-led approach of what "could" happen and within the report, notes a number of limitations;
(ii) There is an expectation that Local Plan allocation sites will need to contribute to the delivery of wider, area-based solutions;
(iii) The list of interventions is not exhaustive and points towards the need to refine identified measures and the potential need for additional mitigation measures as part of the planning application process;
(iv) At planning application stage, there may need to be site-specific additional schemes than those assessed by the STA;
(v) Founded on the Monitor and Manage approach, the mitigations suggested will require further refinement and investigation in close liaison with the highways authorities when developments in the Local Plan come forward in the future; and
(vi) As developments come forward, some mitigations may be required earlier than the end of Plan stage.

- Therefore, while we can support the nature of the evidence base in support of the Publication Plan, the above factors clearly point towards the need for further detail and refinement as development comes forward as planning applications. While we can therefore accept the strategic findings and initial concepts of intervention identified in the evidence base, it should be recognised that the detail of assessment and the nature of schemes will be influenced by more detailed analysis and discussion at planning application stage.

As such, based on the above, we are content that:

- The IDP identifies the transport requirements but, as a live document that should be kept updated, we appreciate that this offers the flexibility to further detail and refine schemes. As the IDP identifies, the mitigation proposals in the STA are not definitive and further work and site-specific assessment is needed, with the Transport Assessments at Planning Application stage identified as offering an opportunity to do this.
- Policy 53 (Accessibility, Transport and Parking) sets out the assessment requirements for developments for them to be granted planning permission. This includes the need for a Transport Assessment / Transport Statement, including the mitigation of impacts.

On this basis, and assuming we have interpreted (above) the Council's intended approach correctly, we are content that the policy provisions of the Plan offer suitable mechanisms to bring development forward with appropriate consideration of the SRN. If this interpretation is not correct, we would appreciate further discussions with the Council to ensure that the safety, reliability, and operational efficiency of the SRN is considered.

Sites that border the SRN

Within our Regulation 18 response, we noted that there were several allocations which border the SRN and identified that these sites will need to pay close attention to the impact on the SRN during planning application stage and National Highways would expect to be consulted further on these sites when proposals come forward.

While we consider the traffic impacts of the proposals within the Publication Plan elsewhere in this response, we seek here to deal with the physical adjacency of these sites to the SRN. The sites that we consider this relevant to are:

- Allocation 1 Southleigh (north of the A27).
- Allocation 6 Land East of Castle Avenue (north west of the A27).
- Allocation 10 Land South of Lower Road Phase 2 (east of the A27).
- Allocation 15 Land West of Hulbert Road (east of the A3(M)).
- Allocation 23 Campdown (west of the A3(M)).

- Allocation 25 Dunsbury Park (east of the A3(M)).
- Allocation 28 Langstone Park (south of the A27).
- Allocation 29 Interbridges West (south of the A27).
- Allocation 30 Interbridges East (south of the A27).
- (The Havant Town Centre broad location for regeneration also borders the A27 eastbound off-slip.)

These sites which are immediately adjacent to the SRN need to consider a range of potential impacts, including air quality; noise; boundary treatments; drainage proposals; structures and stability of embankments or cuttings; and construction safeguards. Aspects of these are covered by policy requirements in some of the allocation requirements (e.g. for the Southleigh allocation, the need is specifically identified for "Mitigating noise disturbance from the adjacent railway line and A27"). However, to ensure that these issues are appropriately considered when development comes forward at planning application stage, we would recommend that either (i) a consistent set of wording should be added to each of these specific allocations, or (ii) for ease, an additional criteria be added to Policy 53 sub-section (d) requiring these aspects to be included in future considerations when a site borders the SRN.

Summary
In summary, and based on the above comments, we can **support the Plan subject to minor modifications**. We consider that:

- The transport evidence base, while strategic in nature, demonstrates a clear approach to delivery of the Plan with appropriate consideration of mitigation measures.
- Identifies strategic infrastructure based on the evidence base supporting the Plan, but with the ability to refine and identify additional mitigation measures.
- The Plan has policy wording in Policy 53 that provides sufficient provision and detailed for the assessment required at planning application stage. This provides the flexibility to enable a monitor and manage approach to be successfully implemented.
- On the basis of the evidence base we do not consider it likely that there would be severe residual impacts on the safe and efficient operation of the SRN.

The modifications that we would propose are related to ensuring appropriate future consideration of the specific factors related to those sites located immediately adjacent to the SRN. Should it be helpful, we would be happy to discuss specific policy wording suggestions with the Council.

I hope that this response is helpful and we look forward to working with the Council in supporting development come forward in the area in a way that suitably consider the safe and efficient operation of the SRN.

Kind regards
Letty Askew (Spatial Planner (Area 3))
Operations Directorate, Spatial Planning Team South
National Highways | Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL.
Web: https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/

From: Planning Policy and Urban Design <planning.design@havant.gov.uk>
Sent: 24 June 2026 11:33
[redacted]
Subject: Publication (Regulation 19) Building a Better Future Plan- Pre-consultation notification

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Dear all

We are writing to advise the Council will be shortly consulting on the Publication (Regulation 19) Building a Better Future Plan.

The Regulation 19 (Publication) version of the Local Plan will be considered at Cabinet on 1st July, 2026, and then at Council on 15th July 2026. If approved, public consultation will take place from 20 July 2026 to 9 September 2026. The Cabinet papers have been published and are available to view by following the link above.

Many thanks if you have already provided feedback on the draft (Regulation 18) Local Plan last summer, through developing Statements of Common Ground and/or the Regulation 19 Local Plan as it has developed into its final form, it is much appreciated. The consultation will provide a further opportunity to provide formal feedback on the legal compliance and soundness of the Plan. We will write again to formally notify you once the consultation goes 'live'.

Whilst writing if you are not the correct recipient to respond to Local Plan consultations, or if this is a organisation/team inbox and this is not the right email address to notify, please can you respond to this email by return?

Thanks very much,

[redacted]

Principal Planning Policy Officer | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX
Advanced notice of leave: 13-17 July 2026

Havant BOROUGH COUNCIL

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