

Planning Statement (incl. Affordable Housing Statement and draft S106 Heads of Terms)

Former Electricity Board Site, Bartons Road, Havant

Report date: August 2025



Prepared for:

Stonebond Properties (Guildford)
Limited

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Appendix 1 – Representations to Havant Borough Council Building a Better Future Plan Consultation		

1 Introduction

- 1.1. Vail Williams LLP is instructed by Stonebond Properties (Guildford) Limited, to submit this Planning Application to Havant Borough Council for the erection of 90 residential dwellings with associated landscaping, parking and improved access.
- 1.2. Stonebond is a partnerships-focussed housebuilder, delivering high quality, mixed-tenure developments. Being a partnerships business, Stonebond works closely with affordable housing providers but also delivers private housing so that their developments cater for everyone to create genuinely sustainable communities.
- 1.3. The proposals have been developed following extensive pre-application discussions with the Local Planning Authority and through public and stakeholder engagement.
- 1.4. The site is allocated in the adopted Havant Borough Site Allocations Plan (2014) under ref. L145 and included in the Draft Local Plan, identified as Allocation 18.
- 1.5. This Planning Application is accompanied by the following:
 - Planning Application Form
 - Planning Application Fee
 - Community Infrastructure Levy Form
 - This Planning Statement (inc. Affordable Housing Statement, Housing Mix Statement, Draft Heads of Terms for Legal Agreement)
 - Statement of Community Involvement (Stonebond)
 - Plans (Edgingtons):
 - Location Plan
 - Block Plan
 - Net Developable Area Plan
 - Boundary and Dwelling Material Layout
 - Illustrative Layout Plan
 - Proposed Elevations
 - Proposed Floor Plans
 - Proposed Site Sections
 - Design and Access Statement (Edgingtons)
 - Schedule of Accommodation (Edgingtons)
 - Landscape Plan (Charnwood Landscape Design Limited)
 - Landscape Statement (incl. Lighting Assessment) (Charnwood Landscape Design Limited)
 - Ecological Assessment (John Wenman Ecological Consultancy)
 - Biodiversity Net Gain Assessment (John Wenman Ecological Consultancy)
 - Biodiversity Net Gain Metric (John Wenman Ecological Consultancy)
 - Flood Risk Assessment and Drainage Strategy (Charles & Associates)
 - Land Contamination Assessment (BRD Environmental)
 - Geo-Environmental Desk Study
 - Geo-Environmental Site Investigation

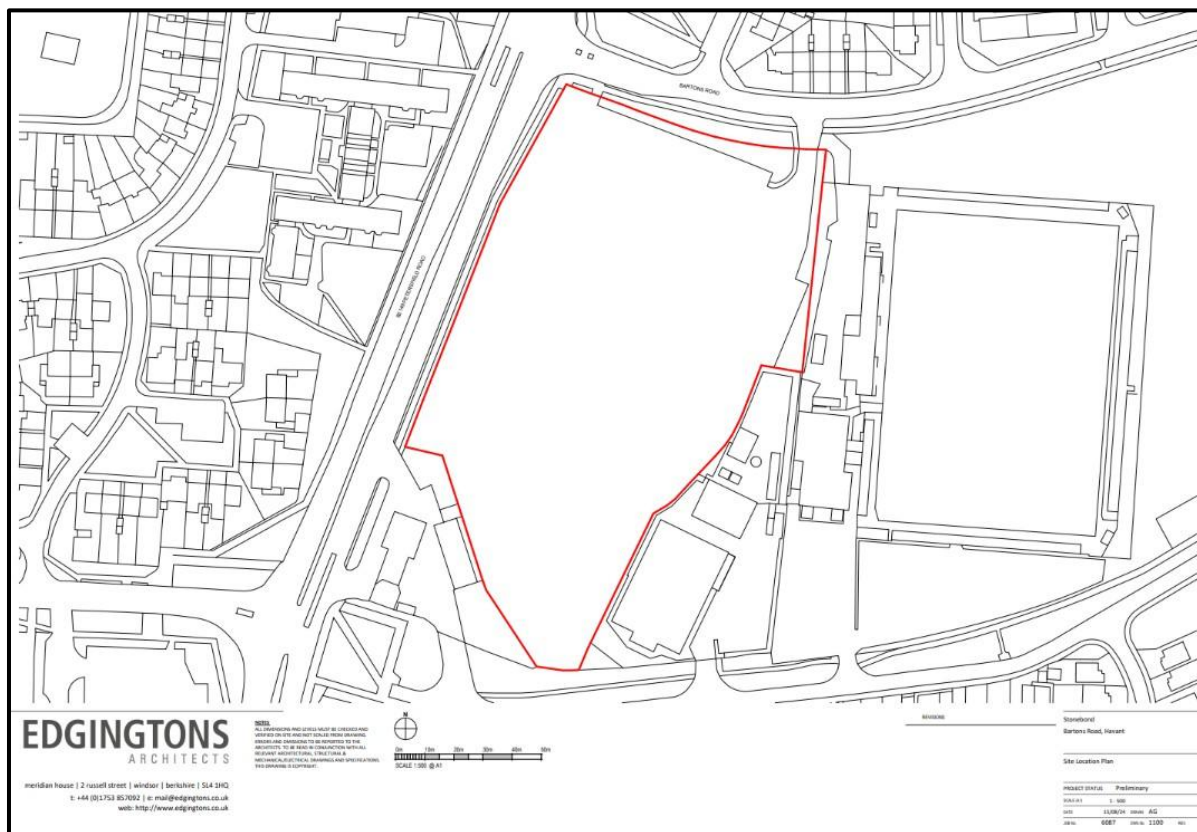
- Soakage Investigation
- Arboricultural Impact Assessment (Mark Welby) including tree survey and tree protection plan
- Noise Impact Assessment (Cass Allen)
- Nutrient Neutrality and Recreational Disturbance Mitigation including: (Stonebond)
 - A European Sites Avoidance and Mitigation Checklist
 - A nutrient budget - completed using the up-to-date Natural England calculator
 - An occupancy calculator - completed using the up-to-date Havant Borough Council occupancy calculator
- Energy and Sustainability Statement (Abbeys)
- Travel Plan (Charles & Associates)
- Transport Assessment (Charles & Associates) (
- Utilities Statement (TDS)
- Air Quality Assessment (Cass Allen)
- Archaeology Assessment (RPS)

2 Site Location and Description

Site Context

- 2.1. The site is located within the administrative area of Havant Borough Council within the residential area of West Leigh. The site previously fell within the ward of Bondfields, now Leigh Park Central & West Leigh.
- 2.2. The site measures circa 1.7ha and is located in the southeastern quadrant of the junction of Petersfield Road and Bartons Road. The site previously comprised a c-shaped 3-storey office building along with 234 car parking spaces and associated landscaping. It was formerly occupied by Scottish and Southern Electricity (SSE).
- 2.3. The site is currently vacant and the existing building was demolished around 2016/17. The site has been cleared for development. It is currently characterised by overgrown grass, hedges, and trees along its boundary, with a large spoil pile in the centre of the site, surrounded by loose gravel and grassland vegetation across the site and scrub along the boundary.
- 2.4. Vehicular access to the site is currently via gated entry from Bartons Road at the northern end of the site. The site is accessible from Bartons Road via Petersfield Road (B2149), a major arterial route across Havant.
- 2.5. A well-surfaced, off-road cycle track is located along the eastern edge of Petersfield Road, linking the development site to Havant town centre and Havant Train Station. This route includes controlled crossing points, clear wayfinding signage and integration with the National Cycle Route 22 (NCR22). Footways surround the site providing convenient access for pedestrians. There are several bus stops in close proximity to the site. 'Douglas Gardens' bus stop is situated approximately 150 metres from the site on Martin Road.

- 2.6. The site is allocated in the adopted Havant Borough Site Allocations Plan (2014) under ref. L145 for 90 dwellings. This allocation has been carried over into the draft Building Better Future Plan in Allocation 18 for around 90 dwellings.



Site Location

Wider Context

- 2.7. The site is located 1.5 km north of Havant Train Station and is well-served by bus routes 621, 21, and 20, which connect the site to Havant Town Centre and Portsmouth City Centre. Additionally, it is within walking distance of Leigh Park District Centre, which offers various shops and services.
- 2.8. In addition to Leigh Park, the site is conveniently situated near several other facilities and services, including Havant and Waterloo Football Club, Downley Business Park, the Front Lawn Community Hub, pubs, a nursery, a primary school, and places of worship. The development site is served by Sharps Copse Primary and Nursery School and Havant Academy.
- 2.9. Staunton Country Park is located approximately 500m to the northwest of the site, providing access to parkland and walking and cycling trails. Bartons Green Recreation Ground is located approximately 750m to the east providing football pitches along with other opportunities for recreational activities. In addition, there is the West Leigh Skatepark which is located along Bartons Road to the east of the Havant and Waterlooville Football Club.
- 2.10. The site is bordered by residential developments to the north, south, and west. The surrounding area has an urban character, featuring a mix of uses. Architectural styles in the vicinity vary, with properties to the north of Bartons Road and south of Martin Road primarily consisting of terraced houses and pairs of semi-detached homes. To the west of the site, beyond Petersfield Road, there are three-storey flatted blocks. Flatted blocks also exist in the local area, for example Chawton Way, up to four stories in height.

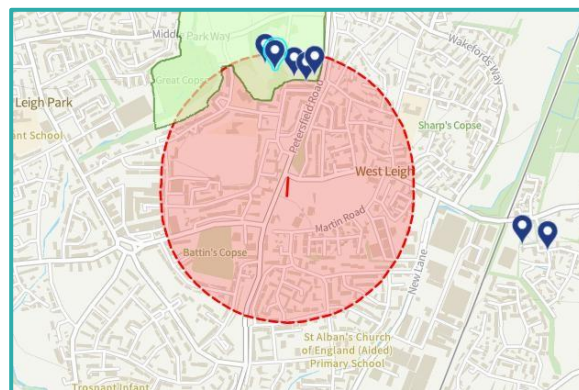
Site Designations

- 2.11. The entire site is located within Flood Zone 1 according to the Government's flood map for planning, it does experience surface water flooding.



Government's Flood Map for Planning

- 2.12. According to Historic England's mapping there are no nearby heritage or listed buildings on or adjacent to the site. The Leigh Park (Staunton Country Park) is a conservation area which is in 500m radius from the site and located north of the site, separated by Petersfield Road and existing buildings.



Historic England Map

- 2.13. Havant Borough Council's List of Buildings of Local Interest confirms there are no locally listed buildings in the immediate vicinity of the site. The nearest are Leigh Cottages (approx. 100m south) and Prospect Farm House (approx. 0.75km north). Leigh Cottages (Nos. 1–9 Petersfield Road) are separated from the site by a car dealership, green space, and a detached dwelling.
- 2.14. The site is within the catchment requiring development to satisfy Nutrient Neutrality according to the DEFRA's website.
- 2.15. Internationally designated statutory sites and three nationally designated statutory sites are located within a 5km radius of the site, which include:
- Solent & Isle of Wight Lagoons Special Area of Conservation (SAC);
 - Chichester and Langstone Harbours RAMSAR Site & Special Protection Area (SPA);
 - Solent Maritime SAC;
 - Langstone Harbour Site of Special Scientific Interest (SSSI);
 - Warblington Meadow SSSI; and

- Chichester Harbour SSSI.
- 2.16. Six locally designated non-statutory sites, i.e. Site of Importance for Nature Conservation (SINC), were highlighted within a 1km search radius including Battins Copse, Great Copse, High Lawn, Wakeford's Copse, Thicket Lawn and Barton's Copse and The Slip.
 - 2.17. The site falls within 5.6 kilometres of the Solent's SPAs and therefore will make a contribution towards mitigation via the Bird Aware Solent Revised Strategy.
 - 2.18. Mature vegetation including trees and hedgerows are limited to the boundaries of the site. Whilst reference is made in the draft Building a Better Future Plan site allocation to a Tree Preservation Order of a single tree in the centre of the site, this does not exist and has been confirmed through pre-application discussions as a mapping error.
 - 2.19. There are no other statutory designations.

3 Planning History

- 3.1. According to Havant Borough Council's website, the following planning history is of relevance to the site.
 - Proposed Development site (former Electricity Board site), Bartons Road, Havant:
 - Application Reference APP/20/00658 | Proposed development of 175 apartments together with associated access, parking and landscaping. Refused on 20 October 2022.
 - The application was refused on the grounds of the absence of affordable housing, high site density, a scale that does not reflect the character of the surrounding area, and the lack of a Section 106 Agreement. As such, the proposal was considered contrary to relevant local planning policies.
 - Application reference APP/16/00940 | Application to determine whether prior approval is required for the method of demolition and site clearance. Approved on 6th October 2016.
 - Neighbouring SSE site (southeast of the site):
 - Application reference 08/50018/029 | Construction of two storey operations centre including a Data Recovery and Resumption centre. Single storey energy centre block (housing uninterrupted power supply) and external plant compound. Associated car parking revisions and new access to Martin Road. | Approved on 13th June 2008.
 - Application reference 07/50018/028 | New cycle shed, temporary office and storage accommodation, temporary car park and temporary access from Martin Road | Approved on 9th August 2007.
 - Application reference 06/50018/027 | Construction of two storey operations centre including a Data Recovery and Business Resumption Centre. Single storey energy centre block (Housing UPS) and external plant compound. Associated car parking revisions and new access to Martin Road | Approved on 24th April 2007.
 - Application reference | 06/50018/026 | Formation of two storey data centre, disaster recovery office and ARC with associated car parking and access to Martin Road | Approved on 30th May 2006

- 3.2. There are also a number of applications relating to installation of machinery and telecommunications equipment.
- 3.3. Relevant development close to the site includes the Former Site of Colt International Ltd, New Lane, Havant PO92LY (approximately 300m to the east).
- Application reference APP/18/00244 | Outline application with all matters reserved. Mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860 sqm of employment floorspace and improved access onto New Lane and Martin Road. On-site parking for residential and employment uses. Landscaping to be provided, including acoustic bund to rear of employment units and naturalisation of existing watercourse. Granted on 30 January 2019.
 - This application is of a similar scale and density to the proposed development.

4 Planning Policy

- 4.1. The planning policy framework in Havant is currently governed by the National Planning Policy Framework, along with the development plan for the borough which comprises the:
- Core Strategy (2011);
 - Site Allocations Plan (2014); and
 - Hampshire Minerals and Waste Plan – Policies are not discussed below as the site is not within or within 200m of a Minerals Consultation Area according to the Plan Policy Map.

The emerging Havant Borough Local Plan 2036 was withdrawn in 2021 however the council are working on 'Building a Better Future Plan' and the regulation 18 draft plan consultation was taken place from 6th May 2025 - 1st July 2025. Representations have been submitted to this consultation and a copy is included in Appendix 1.

National Planning Policy Framework (NPPF December 2024)

- 4.2 **Paragraph 8** outlines how sustainable development is achieved through three overarching objectives. These are the economic objective, social objective and environmental objective. These objectives should be delivered through the application of policies contained within this Framework and subsequent local plans. Delivery of development in accordance with adoptive policies achieves a sustainable development where there is a presumption in favour of this.
- 4.3 **Paragraph 11** states plans and decisions should apply a presumption in favour of sustainable development. For decision-taking in Havant Borough this means:

“where the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

Footnote 8 clarifies that paragraph 11 includes situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites. Havant Borough Council can only demonstrate 1.8years supply of deliverable housing sites.

- 4.4 **Paragraph 39** encourages local planning authorities to approach decisions on proposed developments in a positive manner and work proactively with applicants to secure developments that will enhance the economic, social, and environmental conditions of the area.
- 4.5 **Paragraph 40** highlights that early engagement has significant potential to improve the efficiency and effectiveness of the planning application process for all parties. High-quality pre-application discussions foster better coordination between public and private resources, leading to improved outcomes for the community.
- 4.6 **Paragraph 48** states that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations suggest otherwise. Decisions on applications should be made as quickly as possible, and within the statutory timescales, unless the applicant has agreed to a longer period in writing.
- 4.7 **Paragraph 61** seeks to support the Government's goal of increasing housing supply, sufficient land must be available in the right locations, addressing the needs of specific groups, and developed without delay. The aim is to meet the area's identified housing need with a suitable mix of housing types for the local community.
- 4.8 **Paragraph 65** states where affordable housing is needed, planning policies should specify the required types, including a minimum proportion of Social Rent homes, and expect on-site provision unless off-site or financial contributions are justified and contribute to balanced communities.
- 4.9 **Paragraph 71** promotes mixed tenure sites as it offers benefits like diverse communities and faster build-out rates. Local planning authorities should support these developments, including a mix of ownership and rental tenures, affordable housing, build-to-rent, housing for specific groups, and self-build plots.
- 4.10 According to **Paragraph 79** to maintain housing supply, local planning authorities must monitor the progress of permitted sites. If the Housing Delivery Test shows delivery has fallen below 75% of the authority's housing requirement over the past three years, three consequences apply:
- **Action Plan** – identify causes of under delivery and steps to boost future delivery;
 - **20% Buffer** – add a 20% buffer to the supply of specific deliverable sites;
 - **Presumption in Favour of Sustainable Development** – this applies as outlined in the Framework.
- 4.11 **Paragraph 80** states The Housing Delivery Test consequences take effect the day after the annual results are published, replacing the previous results. Until then, the most recent published results remain in effect.
- 4.12 **Paragraph 86** states that planning policies should aim to address potential barriers to investment, such as housing.
- 4.13 **Paragraph 96** states that planning policies should aim to create healthy, inclusive, and safe places by:
- a) Promoting social interaction through pedestrian/cycle-friendly street layouts.
 - b) Ensuring safety and accessibility by designing clear routes and quality public spaces that reduce crime and encourage active use.
- 4.14 **Paragraph 109** stresses the importance of considering transport issues early in planning and development.

- 4.15 **Paragraph 110** directs development to areas supported by sustainable travel modes which genuine choice of sustainable travel modes is possible.
- 4.16 **Paragraph 112 & 113** states parking standards should consider accessibility, development type, public transport availability, local car ownership, and the need for charging spaces for ultra-low emission vehicles. Maximum standards should only be set to manage traffic or optimize development density in areas well-served by public transport, with a focus on improving parking quality and promoting pedestrian and cyclist accessibility in town centres.
- 4.17 **Paragraph 116** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 4.18 **Paragraph 118** states all developments that will generate significant amounts of movement should be supported by a vision-led transport statement or transport assessment.
- 4.19 **Paragraph 124** states planning policies and decisions should promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.20 **Paragraph 129** states planning policies and decisions should support development that makes efficient use of land, considering the identified need for different types of housing and the availability of land suitable for accommodating it.
- 4.21 **Section 12** of the NPPF encourage high-quality, sustainable design that aligns with local character and community needs. Development should incorporate early community input and demonstrate good design principles for long-term sustainability.
- 4.22 **Paragraph 166** directs developments to development plan policies on the local requirements for decentralised energy supply unless not feasible or viable. The site layout should also be considered to minimise energy consumption.
- 4.23 **Paragraph 170** seeks development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Development should also be made safe for its lifetime without increasing flood risk elsewhere.
- 4.24 **Paragraph 192** emphasises the protection and enhancement of biodiversity, outlining criteria for plans to ensure that development proposals consider and support biodiversity conservation.

Local Planning Policy Context

- 4.25 According to Havant Borough Council interactive map the site has the following designations:
- Solent Recreation Mitigation Strategy 5600m Buffer
 - Special Protection Area Buffer Solent 5600m
 - Residential Allocation
 - Regeneration of the Borough area – Policy CS6
 - A single tree preservation order – this is confirmed as an incorrect designation in pre-application discussions.

Havant Borough Core Strategy (2011)

- 4.26 **Policy CS1 Health and Wellbeing** requires sufficient open space within developments and for them to contribute effectively to opportunities for increasing cycling, including through cycle and footpath links.
- 4.27 **Policy CS6 Regeneration of the Borough** promotes development in the Leigh Park area within which this site is located with a particular focus on supporting the following:
- A balanced housing market.
 - Supporting healthy lifestyles.
 - Community safety.
 - Connectivity with the rest of the borough.
 - Training and employment opportunities.
- 4.28 **Policy CS8 Community Safety** states planning permission will be granted for developments that prioritise community safety from the outset. This includes providing well-lit footpaths, cycleways, and roads that do not harm designated habitats or the landscape, promoting natural surveillance through thoughtful design, and maximizing defensible space that is either controlled or perceived as controlled by residents.
- 4.29 **Policy CS9 Housing** seeks planning permission to be granted for housing proposals that contribute to the delivery of 6,300 new dwellings by 2026, with 30-40% affordable housing on sites of 15 or more dwellings unless justified by viability. Developments should promote mixed communities, provide appropriate densities, offer a range of dwelling types to meet local needs, and include accommodation for the ageing population.
- 4.30 **Policy CS13 Green Infrastructure** states development will be permitted if it maintains and enhances the green infrastructure network, creates new green spaces where needed, and does not harm its integrity.
- 4.31 **Policy CS14 Efficient Use of Resources** states planning permission will be granted for residential development that unless proven to be financially or technically unviable, meets the following standards – Level 3 of the Code for sustainable Homes. Code for sustainable homes no longer exists but sustainability measures accompany this development proposal.
- 4.32 **Policy CS15 Flood and Coastal Erosion Risk** requires all development to ensure that there is no net increase in surface water runoff. Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate. Where SuDS are provided arrangements must be put in place for their whole life management and maintenance.
- 4.33 **Policy CS16 High Quality Design** states planning permission will be granted for high-quality development that respects local context, integrates with the landscape, promotes biodiversity, and ensures good connectivity. It should enhance safety, minimise traffic dominance, improve the public realm, and ensure accessibility. Developments must support mixed-use, higher densities, sustainable design, resource efficiency, and adaptation to changing needs and climate.
- 4.34 **Policy CS17 Concentration and Distribution of Development within the Urban Areas** reiterates the desire to concentrate development within urban areas, including Leigh Park. The priority is previously developed land, including redundant, derelict or underused land in the urban area.
- 4.35 **Policy CS19 Effective Provision of Infrastructure** seeks to ensure that development mitigates its infrastructure requirements. This is then linked to Policy CS21 (Developer Requirements), which highlights a range of infrastructure types that might apply.

- 4.36 **Policy CS20 Transport and Access Strategy** supports if the transport strategy, reduces congestion, improves access, ensures safe road use, and enhances transport options, especially public transport, walking, and cycling.
- 4.37 **Policy CS21 Developer Requirements** outlines that development will be permitted if on-site and/or off-site infrastructure requirements are met. This will be either through on site, off site or financial contributions. If the infrastructure requirements are not met then the application will be refused.
- 4.38 **Policy DM8 Conservation, Protection and Enhancement of Existing Natural features** states development will be permitted if it protects natural features like trees, integrates existing features into the design, and provides new landscaping using local materials.
- 4.39 **Policy DM10 Pollution** states that development that may cause pollution through noise will only be permitted where the health and safety of existing and future users of the site, or nearby occupiers and residents is not put at risk.
- 4.40 **Policy DM11 Planning for more sustainable travel** states council will promote sustainable travel by securing measures for integrated non-motorised access, requiring safe parking facilities, improving public transport, and reducing informal parking that affects safety or capacity. New developments should be designed to encourage lower vehicle speeds and integrate with pedestrian, cycle, and public transport routes to support walking and cycling.
- 4.41 **Policy DM12 Mitigating the Impacts of Travel** states that new developments must mitigate travel impacts by providing transport infrastructure, submitting transport assessments for major projects and submitting a travel assessment framework for outline applications.
- 4.42 **Policy DM13 Car and Cycle Parking on Residential Development** - Residential development will only be permitted where it provides car parking and cycle storage in accordance with the standards set out in the Residential Car Parking and Cycle Provision Supplementary Planning Document.

Havant Borough Local Plan (Allocation Plan) (2014)

- 4.43 **Policy AL1 Presumption in Favour of Sustainable Development** states council will take a positive approach to development proposals, working proactively with applicants to ensure solutions that improve economic, social, and environmental conditions. Applications in line with local plan policies will be approved without delay, unless material considerations indicate otherwise. If there are no relevant or outdated policies, permission will be granted unless adverse impacts significantly outweigh the benefits or specific NPPF policies restrict development.
- 4.44 **Policy DM17 Contaminated Land** sets out that planning permission will be granted to develop sites where contaminated land is identified, where risks are identified and mitigated. The mitigation must reflect the end use of the development and not negatively affect human health, groundwater or the wider environment.
- 4.45 **Policy DM18 Protecting New Development from Pollution** builds on Core Strategy Policy CS16 by seeking to ensure that future users' amenity would not be subject to significant negative effects from air, noise, vibration, light, water or other pollution.
- 4.46 **Policy DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development** says that residential development will be granted where it avoids or mitigates recreational impacts on SPAs. Mitigation can be through a financial contribution and/or a developer's own package of measures.
- 4.47 **Policy LP1 Leigh Park Housing Allocations** policy references L145, which is the allocation for the proposed development site for 90 dwellings and requires any proposal to take account of all site specific development requirements set out in the relevant site profile:

The SSE Offices Site, Bartons Road (reference L145) is allocated for residential development, with an indicative allocation for 90 dwellings. Planning permission will be granted provided that detailed

proposals are consistent with the indicative figure for number of dwellings and take account of the site specific requirements as detailed below.

- Employment and Skills Plan to support planning application
- Investigate ground quality conditions and address any matters that arise
- Utilise existing access point on Bartons Road
- Ensure appropriate amenity level for occupants of proposed dwellings with regard to noise
- Southern Water request connection to sewerage system at nearest point of adequate capacity
- Appropriate easement from existing sewage/waste infrastructure

Havant Building a Better Future Plan – Draft Regulation 18 Consultation (2025)

- 4.48 As the Council's emerging Building a Better Future Plan has only undergone its first formal public consultation (May to July 2025), the draft holds limited weight in decision-making at this stage.
- 4.49 **Policy 1: Spatial Strategy** the plan sets out a spatial strategy focused on sustainable and efficient urban development, prioritising housing and employment growth in brownfield and existing urban areas, reducing car dependency, and protecting green landscapes.
- 4.50 **Policy 2: Defined Urban Areas** states development within the designated urban area is acceptable in principle.
- 4.51 **Policy 5: Amount of Housing** states from 2023 to 2043, the plan commits to delivering at least 7,218 net new homes across the borough, averaging around 361 dwellings per year.
- 4.52 **Policy 7: Five Year Housing Land Supply** states where a five-year supply cannot be shown, applications that conflict with the plan may still be permitted if they meet all of the following: comply with all policies except Policy 2; avoid sites of particular environmental importance; and pose no significant adverse impacts, including on internationally protected habitats
- 4.53 **Policy 8: Health and Climate Change** states all developments must create high-quality, sustainable environments that improve health and well-being by minimising greenhouse gas emissions, reusing materials, incorporating low-carbon technologies, managing surface water (e.g. via SuDS), and conserving green networks. Additionally, proposals should enable active travel and social interaction, provide safe access to public spaces, employment, and education, and larger developments (40+ homes) must include a Health Impact Assessment to demonstrate these outcomes.
- The elements of a Health Impact Assessment are included within this planning statement and other supporting documentation.
- 4.54 **Policy 9: New Homes for Sustainable Communities** promotes the creation of mixed, sustainable communities by allocating a diverse range of housing through strategic sites like Southleigh, alongside small and medium brownfield and urban extensions.
- 4.55 **Policy 11: The Role of Applicants and the Local Planning Authority in Delivering Development** commits to working proactively with applicants including through pre-application advice, community consultation, and Development Consultation Forums for larger projects to resolve issues early and enable timely consent for sustainable development.
- 4.56 **Policy 12: High Quality Design** seeks all new development to deliver high-quality, sustainable design that responds proactively to climate change, integrates with local character and landscape, and enhances amenity, safety, biodiversity, and public realm quality.
- 4.57 **Policy 13: Housing Density** seeks residential development with a net gain of five or more dwellings must optimise land use by achieving a minimum net density of 80 dwellings per hectare within

Havant, Waterlooville, and Leigh Park town centres; 55 dph in defined opportunity areas; and 40 dph elsewhere across the borough. Proposals must submit a Density Study to justify their approach. Developments presenting artificially low densities will be refused.

- 4.58 **Policy 15: Low Carbon Development** seeks all development integrate the Energy Hierarchy by prioritising energy efficiency, reducing embodied carbon, and incorporating renewable energy sources. Residential projects resulting in a net gain of five or more dwellings must submit a Sustainability Statement detailing compliance with these principles, including adherence to Passivhaus design standards, achieving specified energy consumption targets, and conducting whole-life carbon assessments for larger development.
- 4.59 **Policy 18: Water Efficiency** requires that all development resulting in a net gain of overnight accommodation, including replacement dwellings, conversions, and changes of use, must incorporate measures to achieve a water efficiency standard of no more than 110 litres per person per day.
- 4.60 **Policy 19: Biodiversity Net Gain** requires that all developments subject to the Environment Act's Biodiversity Net Gain (BNG) obligations achieve a minimum of 10% net biodiversity gain, as measured using the latest DEFRA Biodiversity Metric.
- 4.61 **Policy 27: Drainage Surface Water** requires that all new development fully consider current and future drainage needs, including climate change scenarios, ensuring that drainage systems are effective throughout the development's lifetime without increasing flood risk elsewhere.
- 4.62 **Policy 30: Heritage and the Historic Environment** recognises non-designated heritage assets as local heritage elements that merit consideration in planning decisions. However, the proposed development is considered to have no impact on these assets, as they are separated from the site by a car dealership, a green space, and a detached dwelling.
- 4.63 **Policy 31: Trees, Hedgerows and Woodland** seeks all new development to conserve and enhance existing trees, hedgerows, and woodland, with protection during construction and mitigation planting where loss is unavoidable. Major schemes must include planting that supports visual amenity, climate adaptation, and biodiversity, and must secure long-term maintenance arrangements for landscaping and trees.
- 4.64 **Policy 32: Affordable Housing** states residential proposals delivering 10 or more net new homes must provide affordable housing as follows: a minimum of 30% on greenfield sites; 20% on previously developed land; and 10% on PDL schemes comprised entirely of flats or apartments. The tenure mix should include at least 42.5% social rent and 20% affordable rent, with the remainder delivered through shared ownership or other affordable products—provided on-site unless the council accepts off-site delivery or a financial contribution in exceptional circumstances.
- 4.65 **Policy 33: Housing Mix** seeks development proposals of 10 or more new homes (gross) to provide a range of dwelling types and sizes to meet identified local housing need and to foster balanced, sustainable and integrated communities.
- 4.66 **Policy 46: Contaminated Land** states where development is proposed on sites likely affected by contamination, planning permission will only be granted if the applicant either demonstrates no risk exists or submits a comprehensive risk assessment and remediation strategy prepared by competent professionals.
- 4.67 **Policy 47: Accessibility, Transport and Parking** states proposals must follow a transport hierarchy that prioritises reducing the need to travel, supporting vulnerable users, walking, cycling, and public transport before private car usage. Planning permission will only be granted if all transport modes are accommodated where safe access is provided for all users, layouts encourage permeability and low vehicle speeds, appropriate parking and servicing arrangements are included, and residual impacts are addressed through Transport Statements or Travel Plans.

- 4.68 **Policy 54: Community New Development Officers** states developments for 40 (gross) or more dwellings will be required to contribute towards a network of Community New Development Officers, to help residents in the development to integrate into the wider community, build community cohesion and promote neighbourhood identity. Major developments smaller than 40 (gross) may need to provide a contribution depending on the nature of the scheme.
- 4.69 Within this draft plan, the site known as **Allocation 18: Former Electricity Board, Bartons Road**, is identified for residential development. The draft allocation requirements are as follows:
- 4.70 Development of about 90 dwelling will be permitted where proposals:
- a) Provide an ecologically sensitive lighting strategy;
 - b) Provide improvements to nearest bus stops;
 - c) Address the risk of surface water flooding;
 - d) Surface water management systems produce a 50% betterment on pre-development flow rate;
 - e) Avoid risks to the protected aquifer underlying the site;
 - f) Provide radon mitigation measures if required;
 - g) Provide native-led landscaping;
 - h) Protect and enhance the open mosaic habitat on site;
 - i) Retain the line of trees to the west of the site to protect the character of Petersfield Road;
 - j) Takes into consideration the locally listed buildings to the south of the site;
 - k) Improve pedestrian and cycle routes across Petersfield Road to Leigh Park Town Centre;
 - l) Provide a cycle corridor on Bartons Road
 - m) Safeguard the amenity of occupants having particular regard to noise from Petersfield Road and the adjacent football stadium;
 - n) Retain and integrate the protected tree on site.
- 4.71 Representations have been made to the draft Building a Better Future Plan consultation and are included as an appendix which addresses some of the amendments required to the draft allocation. For example, there is no protected tree on site.

Supplementary Planning Documents

- 4.72 Supplementary Planning Documents (SPD's) provide additional guidance to the policies and are material planning considerations.
- 4.73 The **Borough Design Guide SPD** supplements **Policy CS16** of the Havant Borough Core Strategy and aims to raise the standard of design across the borough. It sets out the council's design expectations with regard to new development and helps to identify and define the distinctive character and qualities of the borough that should be respectfully improved and enhanced through development.
- 4.74 The **Housing SPD** for Havant Borough Council expands on **Policy CS9**, addresses the borough's housing needs, including the demand for affordable housing. The housing mix comprises 25% one-bedroom flats, 30% two-bedroom houses, and 33% three-bedroom houses.
- 4.75 For C3 dwellings, the parking requirements are as follows:

- 1-bedroom: 1 space
- 2–3-bedroom: 2 spaces
- 4+ bedroom: 3 spaces.

The cycle parking requirements are:

- 1-bedroom: 1 space
- 2+ bedroom: 2 spaces.

- 4.76 Rented accommodation, particularly social rented housing, can have fewer cars than owner occupied households of a similar size and type. These standards are outlined in the **Parking Supplementary Document (SPD)** adopted in July 2016.

5 Proposed Development

- 5.1. The proposed development comprises of 90 new dwellings ranging from 1-bedroom to 4 bedroom properties, of which at least 50% will be affordable. The affordable housing consists of a mix of 1 and 2-bedroom flats and 2, 3 and 4-bedroom houses.
- 5.2. The proposed houses are mostly all two-storey in form similar to the majority of the neighbouring dwellings along Bartons Road. There are some 2.5 storey dwellings, alongside a 4 storey apartment block.
- 5.3. The scale and height of the new dwellings reflects the immediate surroundings.
- 5.4. The proposal includes landscaping, open space, gardens for all houses and private amenity space for the flats with some also benefitting from private balcony space. It will deliver a biodiversity net gain, as well as the provision of car and cycle parking in accordance with Havant Borough Council's Parking SPD (2016).
- 5.5. The proposed development seeks to bring forward the comprehensive redevelopment of the site for residential use, delivering housing which contributes towards Havant Borough Council's acute housing need across all tenures by facilitating the regeneration of a brownfield site in a sustainable location.
- 5.6. The net developable area density is 56.96 dwellings per hectare.

Scheme Benefits

- 5.7. The scheme will deliver a number of very substantial and tangible benefits, which are material considerations weighing in favour of the positive determination of the application as set out in national and local planning policy. These include:
- Provision of high-quality residential dwellings to meet local need;
 - Delivery of at least 50% affordable housing, in excess of existing planning policy requirements;
 - Public open space including high quality private and communal amenity space for future and existing residents;
 - A biodiversity net gain;
 - High-quality sustainable designs which respond to the local character and vernacular;

- Productive re-use of a brownfield site which has been vacant for years;
- Improvements to the bus stop on Martin Road and pedestrian / cycle routes across Petersfield Road to Leigh Park to promote sustainable transport options, enhancing the sites sustainable location;
- Native-led landscaping and public realm enhancements to improve the appearance of the site;
- Creation of local employment opportunities during the construction period; and
- Contribution to the vitality and viability of the existing services within Leigh Park to address the economic needs of the local area.



Proposed Site Layout

6 Pre-Application Advice

- 6.1. This section of the statement summarises the advice received during consultation with the planning officer, Mr. D. Eaves, on 22 November 2024 and the most recent pre-application discussions held on the 9 June 2025.
- 6.2. This planning application is also accompanied by a Statement of Community Involvement which outlines the public consultation exercise undertaken and the responses received.

Initial Pre-Application Discussions with Havant Borough Council Planning Authority – 2024

- 6.3. A pre-application response was provided by Planning Officer David Eaves, on 22 November 2024. Below is a summary of the feedback received as part of the pre-application response.
- The principle of residential development on the Bartons road site is supported, as it lies within the built-up area, is a brownfield allocation (site L145), and aligns with relevant local and national planning policies.
 - A number of key considerations were raised including nutrient neutrality, as well as providing 30–40% on-site affordable housing.
 - The proposed housing mix and density (54 dph) are acceptable in principle, though opportunities for higher densities may be encouraged to meet housing need.
 - Design should ensure active frontages, quality landscaping, appropriate noise mitigation, and compliance with parking standards.
 - Open space, play areas, and private amenity spaces are required, especially for flats.
 - Access must prioritise Bartons Road and early engagement with Hampshire County Council Highways is advised.
 - Ecology, biodiversity net gain, contamination risks, and utilities (including existing sewers and gas infrastructure) will require further assessment.
 - Overall, the scheme is promising, but a formal pre-application process is strongly recommended to address these matters in detail.

Formal Pre-Application Discussions with Havant Borough Council Planning Authority – 2025

- 6.4. A pre-application advice request was submitted for 91 dwellings.
- 6.5. Following pre-application discussions on the 9 June 2025, a written pre-application response was received which advised that due to the allocation of the site for the similar quantum of development, the proposed residential development is strongly encouraged.
- 6.6. The principle of residential development is considered acceptable as it would make a contribution to the Council's housing needs on an allocated brownfield site in the built-up Area.
- 6.7. Beyond the principle, planning officer David Eaves advised that improvements to the design should be made to address the following (response in italics):
- There was resistance to considerable amounts of parking fronting the roads. It was considered the development would not secure a compliant parking standard. *The design has been reviewed and layout amended to address this as far as practically possible. We have increased parking to meet standard, although a slight reduction is proposed to AR dwellings. We have accommodated 20% visitor parking which the LPA considered non-negotiable.*

- The block of flats needs to be attractively designed and turn the corner to present appropriate frontages to both roads. *A computer generated image is being produced to illustrate the high quality design of the block of flats when viewed from Petersfield Road/Bartons Road junction.*
- Sustainable links need to be explored further to Martin Road. *The design has been reviewed and layout amended to address this through the provision of an opening to allow pedestrians and cyclists exit to the south of the site. Please note – due to third party land issues a connection cannot be made from the site to the highway boundary, however the opening will facilitate movement should this be desired.*
- The overall mix of unit sizes is considered acceptable. The Affordable Housing mix and tenure require further consideration. *The percentage of on-site affordable housing has increased to 50% which has allowed us to achieve a more varied mix with a tenure split of 70% AR and 30% SO.*
- The external amenity of properties need to be critically assessed to ensure compliance with space standards and the Borough Design Guide. *The design has been reviewed and layout amended to address this. Whilst all houses have a private garden, we have bolstered the private amenity space for the apartments to include balconies (where legal constraints do not prevent us from doing so) as well as open space to the northwest of the apartment building. The communal amenity space has also been relocated to the central part of the site away from the main road so that this is more attractive to residents.*
- Separation distances and impacts between flats and dwellings need to be assessed in detail. This has been reviewed and details as to how the layout complies with standards is set out in the Design and Access Statement (DAS).
- Noise will represent a significant issue for the development and full assessments will need to guide layout and design. *Noise modelling has guided the scheme design and a Noise Impact Assessment accompanies the planning application.*
- It is essential to work with the Highways Authority to ensure that the development appropriately addresses the highway impacts, particularly parking. *See the Hampshire County Council Highways pre-application discussions notes below.*
- Flood risk, foul and surface water drainage will need to be assessed in detail, together with geo-environmental matters. *Relevant consultant reports have been produced to address these matters and all accompany this planning application submission.*
- Ecological impacts including BNG needs to be assessed together with arboricultural and landscaping requirements. *Relevant consultant reports have been produced to address these matters and all accompany this planning application submission.*

6.8. The above suggestions for design improvement have been reviewed in detail, the design has been developed, and additional information is provided within the planning application submission which should provide officers with comfort that the scheme is acceptable in planning terms.

6.9. Overall, pre-application discussions were positive and the main focus being that the proposed development addresses significant housing need on a local plan site allocation.

Hampshire County Council Highways Pre-Application Discussions - 2025

6.10. Charles and Associates have undertaken pre-application discussions with Hampshire County Council Highways. A Transport Scoping Note was submitted in April 2025. The County Council's key advice is set out below (applicant response in italics):

6.11. Access: The Transport Assessment (TA) should demonstrate whether a right turn lane is required at the site access off Bartons Road. *Surveys confirmed no right turn lane is required, proposal is for simple priority t-jct.* Confirmation should be provided that the revised arrangement is agreed with

the football club and that the design accommodates the required movements. *The access to the football club is a secondary road therefore we are proposing to retain this as is. A meeting is scheduled with the football club on the 13th August.*

- 6.12. Emergency Access: The County Council would not require an emergency access for a site of this size. That said a pedestrian and cycle connection should be provided to the south to provide access by these modes onto Martin Road. *A pedestrian and cycle access is proposed off Bartons Road, Peterfield Road and Martin Road for permeability.*
- 6.13. Parking: The proposed provision is significantly below standards and doesn't include any visitor parking. The reasoning for not providing visitor parking spaces on the basis of potential overspill parking from the football club on match days is not considered a suitable reason for removing visitor parking on the development. The County Council consider this under provision to have potential to result in significant levels of overspill parking onto the local highway network which would not be acceptable. *Parking addressed as above.*
- 6.14. Adoption: It is not clear whether the internal roads will be offered for adoption and this should be confirmed. *The extent of the road proposed for adoption is set out in the Transport Assessment (TA).*

7 Public Consultation and Engagement

- 7.1. The planning application is supported by a Statement of Community Involvement ("SCI") prepared by Stonebond, which provides details of the public consultation activity undertaken prior to the submission of the planning application. The scope and timeline of the consultation can be summarised as follows:

- Informal consultation with stakeholders commenced in June 2025.
- 10 June – letter to stakeholders to advise of preparation of planning application and providing information about the proposed development.
- 7-20 July - formal consultation which included:
 - 23 June - Follow up with stakeholders to inform them of planning application consultation
 - 24 June – invites sent to 993 residents and businesses to advise of the public consultation and website
 - 9 July – in-person public consultation at the Leigh Park Centre, Havant.
- Feedback was invited via feedback forms at the in-person event or via post or completing the feedback form on the website www.stonebondproperties.com/bartonsroad

- 7.2. The main themes of the public feedback was as follows:

- Where will affordable dwellings be located on site.
- Price of new homes is too expensive.
- Location and number of car parking spaces.
- Request for inclusion of Knightwood Avenue in traffic assessment.
- Congestion along Bartons Road.

- Single access into the site.
- 7.3. Detailed answers to these questions are contained within the SCI which is submitted in support of the planning application.
 - 7.4. The SCI also contains details of the website, consultation boards and website.
 - 7.5. Stonebond remains committed to ongoing engagement with the local community as the planning application progresses through to determination and has a meeting scheduled with Havant and Waterlooville Football Club in August 2025.

8 Development Considerations

Principle of Development

- 8.1. The principle of development of the proposed site for 90 dwellings is strongly supported by both national and local planning policies, alongside the site's allocation for residential use in the adopted Site Allocations Plan (2014) and emerging Building a Better Future Plan. The proposals accord policy LP1 (Leigh Park Housing Allocations (Sites) and L145 which is the site allocation policy.
- 8.2. The site is located within the built-up area and is surrounded by housing. A residential development of a similar scale was built approximately 400m to the east along Bartons Road which shows that similar developments have been considered acceptable in the locality under the same policy regime.
- 8.3. The proposed development includes a varied housing mix in accordance with Policy CS9 including flats on the northwest corner of the site, creating a landmark building through its design and materiality, and distinguishing the site's location. This is complemented by a range of other house types and sizes, including family housing as demonstrated on the application plans.
- 8.4. As previously developed land, in a sustainable location, the site offers an opportunity for efficient use of land, providing much-needed housing while also incorporating useable landscaping and open space to enhance the environment.
- 8.5. The site's location within a 500m radius of key amenities such as bus stops, a Lidl supermarket, a pub, and sports centres further supports its sustainability. The development would not only meet local housing needs but also contribute positively to the local economy by supporting nearby businesses. Given its urban context, excellent accessibility, and alignment with relevant planning policies, the site is considered acceptable in principle for development.
- 8.6. The proposals therefore comply with Policies CS6 and CS17.

Connectivity and Sustainable Location

- 8.7. The proposed development is designed to provide high-quality amenities for residents, including front and rear gardens, landscaped areas, and the retention of existing vegetation to enhance the site's aesthetic and local biodiversity. A key feature of the development is the improved connectivity between the development and Petersfield Road, creating pedestrian-friendly routes that enhance access to local amenities, public transport, and recreational facilities.
- 8.8. This improved link will promote walking and cycling, supporting sustainable travel options for residents. With its proximity to shops, sports centres, and transport links, alongside thoughtful design to minimise impact on neighbouring properties, the development aims to offer a sustainable, high-quality living environment that benefits both future residents and the wider community, in accordance with Policy CS16 (ensuring increased accessibility), CS17 (development in urban areas) and CS20 (improving access and enhancing transport options including public transport, walking and cycling).

8.9. Further information is provided within the Design and Access Statement.

Housing Need

- 8.10. The proposed development will contribute positively to addressing Havant Borough's housing need through the delivery of 90 new dwellings, comprising a mix of 1- to 4-bedroom units. This range of unit sizes is designed to meet the diverse needs of the local population from smaller households and first-time buyers to growing families and supports the aim of creating a well-integrated, mixed community, in accordance with Policy CS9.
- 8.11. Importantly, the scheme includes an affordable housing component, delivered in accordance with Policy CS9. This provision responds directly to local demand for affordable homes and will assist in improving access to suitable housing for lower-income households in the borough.
- 8.12. The development also addresses a critical shortfall in housing supply. Havant currently has a housing land supply of just 1.8 years, significantly below the required five-year minimum. This undersupply highlights wider issues with the deliverability of sites within the borough and demonstrates the urgent need for sustainable, deliverable housing schemes such as this. Furthermore, Havant's underperformance in the 2023 Housing Delivery Test, achieving only 74% of its required housing delivery means the presumption in favour of sustainable development, as outlined in Paragraph 79 of the National Planning Policy Framework (NPPF), applies.
- 8.13. In this context, the application site represents an opportunity to bring forward a well-located, policy-compliant development that can be delivered in the short term, making a meaningful contribution to housing delivery targets and improving the Council's overall housing land position. The proposal therefore plays a vital role in helping to address challenges facing housing delivery in Havant.
- 8.14. The image below presents the five-year housing land supply calculation for the period 2023/24 to 2028/29, as set out in the Council's Five-Year Housing Land Supply Update, published in December 2024.

Table 3: Five Year Supply Calculation for 2023/24-2028/29 based on 2024 standard method		
Calculating the required supply		Dwellings
A	Five year requirement based on 2024 standard method	4,460
B	Five year requirement with 5% buffer	4,683
C	Five year requirement with 20% buffer	5,352
Identified Supply		
D	Supply over 5 year period 2023/24-2027/28	1,874
Five year land supply (expressed in years):		
Excluding buffer		D / (A / 5)
With 5% buffer		D / (B / 5)
With 20% buffer		D / (C / 5)

Extract from Council's Five-Year Housing Land Supply Update

Density and Mix

- 8.15. The proposed site has a net developable area density of 56.96 dwellings per hectare (dph), which has been carefully considered in relation to the surrounding area to ensure compatibility with the local context while making efficient use of the land. We are mindful of the need to balance density

(efficient use of the site) with the provision of open spaces, amenities, and environmental considerations to maintain the character and quality of the area.

Housing Mix

Affordable	Tenure	No. of units
1B2P Flat	AR/SR	11 (24%)
2B4P Flat	AR/SR	21 (46%)
2B4P House	SO	3 (6%)
3B5P House	SO	9 (20%)
4B6P House	AR/SR	2 (4%)
Total		46

Private	No. of units
2B4P House	6 (14%)
3B5P House	26 (59%)
3B4P House	4 (9%)
4B6P House	8 (18%)
Total	44

- 8.16. The most recent Housing Needs Analysis (HNA) dated October 2023 notes the highest demand is for 2 and 3-bedroom homes, which comprises 71% of demand. This is mostly for houses (68%) followed by flats (17%) and bungalows (15%). This is considered more in line with demand compared to that in the Housing SPD (2011). The proposals reflect this with 2- and 3-bedroom dwellings making up 76.6% of the overall mix. The below demonstrates the proposals are broadly in line with the HNA and therefore further compliance with Policy CS9.

Overall Mix	No. of units	HNA 2023
1 Bed	11 (12.2%)	8%
2 Bed	30 (33.3%)	25%
3 Bed	39 (43.3%)	46%
4 Bed	10 (11.2%)	21%
Total	90	

Affordable Housing

- 8.17. The proposed development will deliver 51% affordable housing, equivalent to 46 dwellings out of the total 90 (see table above). This exceeds the 30-40% requirement for sites of 15 or more units, as set out in Policy CS9 of the Havant Borough Core Strategy. The affordable housing mix includes a range of 1- and 2-bedroom flats, along with 2-, 3-, and 4-bedroom houses. This range of unit sizes helps to meet a variety of local housing needs, from smaller households and first-time buyers to larger families.
- 8.18. Affordable housing will be provided through a mix of shared ownership and affordable / social rent as outlined in the housing mix tables above.
- 8.19. The provision of over half the units as affordable housing makes a significant contribution to addressing local housing pressures, especially with 1,557 applications on the housing register as of May 2025. The development supports the borough's aim of delivering inclusive, mixed, and balanced communities. It aligns with local policy objectives and responds positively to the growing demand for

high-quality, affordable homes in the area. The below demonstrates the proposals are broadly in line with the HNA.

Affordable Mix	No. of units	HNA 2023
1 Bed	11 (24%)	24%
2 Bed	24 (52%)	32%
3 Bed	9 (20%)	24%
4 Bed	2 (5%)	3%
Total	46	

Design

- 8.20. The proposed development has been carefully designed to integrate with the surrounding area and enhance the local character.
- 8.21. The majority of the new dwellings are two-storey, in keeping with the predominantly two-storey residential properties along Bartons Road, with some 2.5 storey. A 4-storey apartment block is proposed to the northwest corner of the site to reflect the nearby built environment and the prominent corner plot.
- 8.22. The dwellings are set back from the apartment block and provide an active frontage to the block. This has reduced any potential for overlooking, safeguarding residential amenity. A minimum distance of 20m between the rear of buildings directly facing each other has been accommodated. For rear to side relationships, the separation distance is a minimum of 10m. The positioning of buildings has been carefully considered and designed to reduce the overlooking.
- 8.23. Road infrastructure and landscaping has been provided along the edges of the development, to ensure dwellings are set back from the key noise sources including the adjacent Havant and Waterlooville football club, Petersfield and Bartons Road, and the SSE building to the southeast of the site.
- 8.24. All the dwellings are compliant with Nationally Described Space Standards (NDSS). In addition, the houses are all M4(2) compliant, and 2 no. of the apartment meet M4(3) to meet the needs of those with disabilities.
- 8.25. The design includes landscaped front gardens and rear gardens to all houses and private amenity for the apartments, providing ample private outdoor space for residents. This includes balconies to the apartments which are sized in accordance with Havant Borough Council's Borough Design Guide SPD (2011). The local area of play has been integrated into the design of the scheme and is well overlooked by active habitable rooms, meeting Policy CS8.
- 8.26. Co-ordination with the design team ecologist has provided opportunity for a low-nutrient mosaic landscaping within our constrained site. Proposed mixed scrub and grassland habitats will be created on low nutrient soil, to recreate the early successional and mosaic habitats that were previously on site. These elements aim to enhance biodiversity net gain. As such, the design responds to existing natural character.
- 8.27. The scheme prioritises high-quality materials and sustainable designs, so the development complements its surroundings. The dwellings provided are tenure blind to promote social integration.

- 8.28. This above is in line with Policy CS16 of the Havant Borough Core Strategy, which emphasises the importance of high-quality design which respects local context and promotes biodiversity.
- 8.29. Further detail on this is provided in the Design and Access Statement which accompanies this planning application, including how the design meets the Council's Seven Key Principles of Good Design.

Sustainability

- 8.30. An Energy and Sustainability Statement accompanies this planning application and outlines that the proposed development will achieve, through the outlined energy strategy, an overall on-site reduction of 65% in regulated carbon dioxide emissions over Part L 2021. This equates to an annual saving of an estimated 60.79 tonnes in regulated CO2 emissions.
- 8.31. The proposed development includes key sustainability measures of:
- Water saving measures to keep the water usage of each dwelling to less than 110 litres per person per day. This is in line with the requirements of Havant Borough Council's Draft Policy 18.
 - Electric Vehicle (EV) Charging Points to be included throughout the proposed development.
 - A high quality construction and design specification.
 - A Travel Plan to promote active and sustainable transport modes.
 - Extensive planting is proposed throughout. A 10% net gain in biodiversity will be achieved through a combined of onsite and offsite measures.
 - The drainage strategy utilises SuDS to help mitigate against any flood risk. The proposed SuDS features to be implemented on the proposed development are underground attenuation, permeable paving and discharge control (hydrobrake).
 - Air quality has been assessed, and subject to appropriate mitigation measures, the overall effect with regard to air quality is considered 'not significant'.
 - Noise – A Noise Assessment has demonstrated that subject to relevant mitigation measures, the site is suitable for the proposed development in terms of noise levels.
 - Measures to help mitigate against the risk of overheating to the dwellings in the summer months.

Utilities

- 8.32. The utilities report has indicated that the site is served by key infrastructure, including water, gas, electricity, and telecommunications, with sufficient capacity to support the proposed development. However, a constraint does exist along the eastern boundary, where high voltage cables and underground duct and chamber networks (Openreach and Neos) are present. The development has been carefully designed around this constraint.
- 8.33. To meet electricity demand an onsite substation is included within the proposed development.
- 8.34. The proposed development is considered acceptable from a utilities perspective and in accordance with Policy CS21.

Trees

- 8.35. An Arboricultural Impact Assessment (AIA) accompanies this application. The assessment concludes that the proposed development will have a low arboricultural impact and is therefore acceptable in arboricultural terms.
- 8.36. A Tree Protection Plan is contained within the AIA outlining the measures for protection of retained trees.
- 8.37. The report also notes that, should the Council consider it necessary to apply further tree protection measures, these can be secured through the imposition of an appropriately worded planning condition.
- 8.38. The proposed development is considered acceptable in arboricultural considerations and in accordance with Policy CS11.

Air Quality

- 8.39. An Air Quality Appraisal (by Cass Allen) accompanies this planning application outlining that the site is not within an Air Quality Management Area and that the overall effect of the development is considered 'not significant'. Therefore the proposal is considered acceptable from an Air Quality perspective, in accordance with the requirements of allocation L145.
- 8.40. Air quality mitigation measures are required during the construction period to suppress dust and particulate matter which can be managed through a Construction Environmental Management Plan produced following the guidance in Appendix 3 of the Air Quality Appraisal.

Open Space

- 8.41. The proposed development incorporates open space within the site, in accordance with local planning policy (Policy CS13) that require sufficient provision of green spaces. The layout will include landscaped areas and private gardens for residents, offering both recreational and aesthetic benefits. The design ensures that the open space is easily accessible and contributes to the overall quality of the environment.
- 8.42. Additionally, the development aligns with Policy CS1 of the Havant Borough Core Strategy, which emphasises the importance of open space for promoting health and wellbeing. The open space integrates with existing green features and contribute to biodiversity improvements, creating a pleasant and sustainable living environment for future residents.

Land Contamination

- 8.43. A geo-environmental desk study and site investigations reports, produced by BRD, accompany this planning application as required by the existing site allocation.
- 8.44. The report confirms that:
- There is no unacceptable contamination in respect of human health;
 - Landfill gas protection measures are not required;
 - Radon gas protection measures are not required;
 - There is no unacceptable contamination risks to water resources, building materials or services and;
 - No asbestos has been detected in the soil samples tested.

- 8.45. As such, no remedial works are considered necessary to facilitate the development.

8.46. The proposed development is therefore considered acceptable from a land contamination risk perspective, in accordance with Policy DM17.

Noise

8.47. A noise assessment, by Cass Allen, accompanies this planning application outlining that noise levels at the site are dictated by road traffic noise emissions from Bartons Road, the B2149, mechanical plant noise from the adjacent SSE site and the adjacent public house.

8.48. The assessment concludes that the design of the development is considered to be acceptable from a noise perspective subject to the adoption of acoustically upgraded glazing and ventilation, and acoustic screening around gardens where necessary. This will ensure compliance with Policy DM10 and DM18.

Ecology

8.49. John Wenman Ecological Consultancy LLP was commissioned by Stonebond Properties to carry out a Preliminary Ecological Appraisal (PEA). The desk study (including a HBIC 1km data search) confirmed that the site is not designated for wildlife interest and has no protected or notable species records. A walkover survey was conducted on August 5th 2024. No Phase 2 surveys are required.

8.50. The site is characterised by bare gravel with parcels of ruderal vegetation and grassland plant communities that form a mosaic within the centre of the site (i.e. sparsely vegetated urban land) meeting the criteria for open mosaic habitat on previously developed land – a priority habitat of high distinctiveness with value at the local level. There were areas of other neutral grassland towards the southern end of the site, bramble scrub adjacent to the tarmac track on the eastern boundary and around the western and northern boundary of the site with mixed scrub and scattered trees on the south-western boundary – which resemble medium distinctiveness habitats of site value for local wildlife (e.g. nesting birds and foraging bats).

8.51. The report includes several recommendations, including:

- Developer contributions towards implementing the Bird Aware Solent Strategy;
- Habitat protection measures;
- Sensitive lighting for bats;
- Precautionary avoidance measures for amphibians and reptiles;
- Precautionary timings for nesting birds;
- An invertebrate survey; and
- Ecological enhancement measures.

8.52. As noted in the drafts Heads of Terms for the S106 Agreement, contributions are proposed towards implementing the Bird Aware Solent Strategy.

8.53. The DAS sets out the sensitive lighting design that has been considered with respect bats. The lighting colour and direction is designed to be sensitive to bats and ensures there is no spill of light onto sensitive areas.

8.54. An invertebrate survey is ongoing and will be provide shortly.

8.55. The habitat protection measures can be secured by suitably worded conditions, whilst the ecological enhancement measures are shown within Appendix 4 of the PEA.

8.56. The proposed development is considered acceptable from an ecology perspective in accordance with Policy CS16.

Biodiversity Net Gain

- 8.57. A BNG Assessment has been undertaken by John Wenman to support the application. The landscape architect and ecologist have worked closely to seek to propose suitable habitats for the landscape scheme.
- 8.58. The proposed habitats for the site include: other neutral grassland; modified grassland; mixed scrub; native hedgerow; developed land, sealed surface; vegetated gardens; introduced shrubs; buildings and scattered urban trees.
- 8.59. The Biodiversity Metric calculation tool demonstrates that the proposals fail to deliver a minimum of 10% net gain for biodiversity on site. The final results taken from the tool shows a total onsite net change of -77.75% in habitat units and a deficit of 8.25 units for achieving a 10% net gain.
- 8.60. To meet the mandatory requirement, offsite gains will need to be made by either purchasing units from a land manager or utilising land outside of the application site but under the applicant's ownership.
- 8.61. The 'Land at Bartons Road, Havant – The Statutory Biodiversity Metric Calculation Tool (R2724_BNG_b)' document should be referred to separately for the full calculation.
- 8.62. The proposed development provides Biodiversity Net Gain (BNG) and will meet the policy requirement through either the purchase of off-site credits or by utilising land outside of the Applicant's control.

Landscape

- 8.63. The proposed development will enhance the site's aesthetics and biodiversity through native planting. The proposals illustrated in the masterplan are based on a number of integrated principles, as set out in the DAS, provide an attractive, distinctive and inclusive place which enhances the area's character and identity.
- 8.64. The site provides a number of opportunities that have been incorporated into the design including an open green heart to the development, pedestrian permeability with roads on three sites, and retention of existing trees to maintain the sites character.
- 8.65. The design will include landscaped gardens, private green spaces, and communal areas, offering recreational benefits while supporting ecological value. Co-ordination with the design team ecologist has provided opportunity for a low-nutrient mosaic landscaping within our constrained site. Proposed mixed scrub and grassland habitats will be created on low nutrient soil, to recreate the early successional and mosaic habitats that were previously on site, in accordance with Policy DM8. These elements aim to enhance biodiversity net gain.
- 8.66. Buffers such as hedgerows and trees will be used to minimise the impact on neighbouring properties, ensuring privacy and visual amenity. The vegetation to the west of the site will be retained, where possible, to protect the character of Petersfields Road. The tree palette will consist of mainly native species with occasional ornamental species in amenity areas. The plant selection will build of the site character and help strengthen local bio-diversity by providing a source of food and shelter.
- 8.67. A landscape management plan will be implemented to maintain green spaces and ensure the long-term sustainability of the development.
- 8.68. A hierarchy of streets in line with the masterplan character areas set out in the DAS.
- 8.69. A Landscape DAS (by Charnwood Landscape Design Ltd), included within the overall DAS accompanies this planning application outlining the approach to landscaping and the landscaping features. This ensures accordance with relevant parts of Policy CS16

Highways

- 8.70. A Transport Assessment, Travel Plan and off-site highways improvements plan accompanies this planning application. These documents have been produced by Charles & Associates.
- 8.71. Local highway improvements are proposed through an enhanced access to the site, shared with the secondary access to the Havant & Waterlooville FC stadium. The site will be accessed via an existing junction on Bartons Road, and a formal junction layout and visibility splays have been completed as part of the Transport Assessment. Fire and refuse tracking is also provided within the TA.
- 8.72. Pedestrian / cycle crossing enhancements at the junction of Petersfield Road and Bartons Road. The existing pedestrian crossing on the northern approach of Petersfield Road will be formalised as a two-stage signal-controlled crossing by upgrading it to a Toucan crossing, enabling both pedestrians and cyclists to cross the road. Also, the crossing on the Bartons Road approach will be upgraded to a Toucan crossing. This will provide improved routes across Petersfield Road to Leigh Park Town Centre in accordance with the draft allocation (Allocation 18). In addition, the existing footway on the southern side of the section of Bartons Road will be upgraded to a shared footway/cycleway with a width of 3m, again, in accordance with draft Allocation 18.
- 8.73. A direct connection to the eastern side of Petersfield Road will be provided through the site. This will enable future residents to directly access the existing footway/cycleway along Petersfield Road, providing connections to Havant town centre to the south, and Havant Academy and the country park to the north.
- 8.74. A pedestrian / cycle route will be provided through the site with an opening to the south. This will not connect directly to Martin Road due to land ownership constraints, but will allow for a connection to be formalised by Portsmouth City Council to the highway boundary if preferable. The nearest bus stop to the site called 'Douglas Gardens' on Martin Road to the south is proposed to be upgraded to provide enhanced waiting facilities for passengers where possible. The eastbound bus stop on the northern side of Martin Road, which also serves the Havant & Waterlooville FC stadium immediately to the north, will be upgraded to provide a shelter and seating for passengers and bus lane road markings.
- 8.75. In addition to the above, a number of non-physical measures are proposed including travel information leaflets and travel incentives by way of bus tickets, cycling contributions or train tickets.
- 8.76. Parking provision follows Havant Borough Council's Parking SPD (2019), and is therefore in accordance with Policy DM13, allowing for reduced requirements for affordable rented housing. The scheme provides an adequate number of car parking spaces, including 20% visitor parking, as outlined in the Design and Access Statement. Following the pre-application discussions the transport considerations have been reviewed to ensure sufficient visitor parking and achieve a design that is less car dominated from the streets.
- 8.77. Due to the site's sustainable location it is possible to utilise sustainable travel modes and the Travel Plan outlines how this is achieved in detail. Pedestrian access into Martins Road (south of the site) has been included, following pre-application advice,. This increases permeability and should further encourage sustainable travel.
- 8.78. The proposed development is considered, by Charles & Associates to be acceptable in highways terms. It is also considered to accord with the requirements of Policies CS20, DM11 and DM12 in that its sustainable location together with the access to Petersfield Road which is incorporated within the proposals will maximise opportunities for walking, cycling and using public transport.

Flood Risk and Drainage

- 8.79. A Flood Risk Assessment and Drainage Strategy accompanies this planning application produced by Charles and Associates.

- 8.80. The site is located in Flood Zone 1. The site experiences surface water flooding which will be managed through the accompanying drainage strategy and utilisation of Sustainable Urban Drainage Systems (SuDS).
- 8.81. Infiltration testing has been undertaken to address the hierarchy of surface water disposal. The report provide by BRD Environmental is submitted alongside this application. The testing was carried out in accordance with BRE 365. The report summarises that infiltration is unlikely to be a viable option on site due to the slow infiltration rates. In addition, due to the location of the site in a built up area surrounded by residential areas there are no watercourses within the vicinity.
- 8.82. The drainage strategy therefore proposes to discharge into a surface water sewer. The strategy has been designed to reduce surface water run-off flows from the site, for storm return periods up to 1 in 100 years plus a 45% allowance for climate change.
- 8.83. A mixture of surface water attenuation measures (non-infiltration) are proposed as the principal method of surface water attenuation. These will include permeable paving with no infiltration to ground and underground geocellular attenuation crates.
- 8.84. The drainage strategy has also been designed to achieve a proposed development that will not increase the risk of flooding elsewhere. The implementation of the SuDS scheme as proposed will reduce any existing risk of downstream flooding.
- 8.85. A foul drainage strategy is also proposed, which demonstrates that it is possible to drain the entire site via gravity to a connection point in the south eastern corner of the site.
- 8.86. The proposed development is considered acceptable from a flood risk and drainage perspective and therefore in accordance with Policy CS15.

Archaeology

- 8.87. An Archaeological Desk Based Assessment, by RPS, accompanies this planning application and advises that given the low archaeology potential and ground disturbances through the construction of the SSE offices that no further archaeology investigations are required.
- 8.88. The proposed development is therefore considered acceptable from an archaeology perspective and would be in accordance with Policy DM20.

Nutrient Neutrality

- 8.89. New housing schemes which include development which has a high volume of water use will need to prevent any increase in nutrients into the harbour in order for them to be 'nutrient neutral'. The occupancy calculator and nutrient budget calculator submitted with the application confirms the total annual nitrogen load to mitigate is 83.22 kg TN/yr.
- 8.90. A European Site avoidance and mitigation checklist is provided alongside this application which confirms the proposed development would be nitrogen neutral as credits have been reserved by the Applicant at Knowle Treatment Works. A copy of the Deed of Allocation can be provided confidentially to allow Havant Borough Council to undertake an Appropriate Assessment.

9 Affordable Housing Statement

Policy Position and Demand

- 9.1. Current planning policy requirements including the Core Strategy policy CS9, and the Havant Borough Housing SPD (July 2011), mean that developments of 15 units or more would be required to provide 30-40% affordable housing on site.
- 9.2. Through pre-application discussions, the Havant Borough Council Housing Officer advised that they would be seeking an affordable housing provision split of 70% rented/ 30% Shared Ownership.
- 9.3. As outlined in the policy section of this planning statement the Housing Supplementary Planning Document for Havant Borough Council expands on Core Strategy Policy CS9 by addressing the borough's housing needs, including the demand for affordable housing. The affordable housing mix demand for the borough is outlined as 25% one-bedroom flats, 30% two-bedroom flats/houses, 33% three-bedroom houses and 12% four and above bedroom houses. As you will see below these figures, published in 2011, have changed through the passage of time and the need leans more towards the small sized units.
- 9.4. The most recent Housing Needs Analysis dated October 2023 emphasises the growing need for 1- and 2-bedroom dwellings which also mirrors the housing waiting lists in Havant. As outlined in the policy section of this planning statement, the proposals are broadly in line with the HNA.
- 9.5. As at 27/05/2025 there are 1557 active applications registered on Hampshire Home Choice (HHC). All applicants are seeking rented accommodation of all sizes in the area:
 - 1-Bed: 653
 - 2-Bed: 522
 - 3-Bed: 312
 - 4+ Bed: 70
- 9.6. Between April 2024 to March 2025, the time between registration and nomination for Band 3 applicants (reasonable priority) was 2 years 11 months - 6 years 11 months. The wait for 3- and 4-bedroom homes is longer. Applicants in Band 2 (high priority), had an average wait time of 3 years 4 months for a 4+ bedroom home.
- 9.7. This highlights the need for rented dwellings in Havant which are provided through this application.

Affordable Housing Provision

- 9.8. The proposed development will deliver at least 50% affordable housing, equivalent to 46 dwellings. This exceeds the 30-40% requirement for sites of 15 or more units, as set out in Policy CS9 of the Havant Borough Core Strategy.
- 9.9. The affordable housing mix includes a range of 1- and 2-bedroom flats, along with 2-, 3-, and 4-bedroom houses as set out in the table below. This range of unit sizes helps to meet a variety of local housing needs, from smaller households and first-time buyers to larger families.

Affordable	Tenure	No. of units
1B2P Flat	AR/SR	11 (24%)
2B4P Flat	AR/SR	21 (46%)
2B4P House	SO	3 (6%)
3B5P House	SO	9 (20%)
4B6P House	AR/SR	2 (4%)
Total		46

- 9.10. Affordable housing will be provided through a mix of shared ownership (26%) and affordable rent (74%) in line with that sought by the Housing Officer during the pre-application process.
- 9.11. The affordable proposals prioritise one and two bed rented units, in line with increasing demand for these units as above, providing:
- 1-Bed: 11 (32%)
 - 2-Bed: 21 (62%)
 - 3+ Bed: 2 (6%)
- 9.12. As previously mentioned, the flats are all designed to meet Nationally Described Space Standards (NDSS) with respect to 1B2P and 2B4P, with two M4(3) units located on the ground floor with associated priority parking close to the entrance of the flats. This seeks to meet the current rented waiting list demand for smaller family homes. All houses meet NDSS and M4(2).
- 9.13. The provision of over half the units as affordable housing makes a significant contribution to addressing local housing pressures and supports the borough's aim of delivering inclusive, mixed, and balanced communities. It aligns with local policy objectives and responds positively to the growing demand for high-quality, affordable homes in the area.

10 Draft Heads of Terms

- 10.1. Policy CS21 'Developer Requirements' and Policy CS19 'Effective Provision of Infrastructure' sets out that planning permission will be dependent on there being sufficient and effective infrastructure.
- 10.2. It is expected that the following contributions may be applied to a future planning permission for residential development at the site:
- Affordable Housing (not less than 50% affordable housing);
 - Havant Borough Council and Hampshire County Council Monitoring Fees;
 - Management Company and Management Plan;
 - Solent Recreation Mitigation Strategy (meeting Policy DM24);
 - Biodiversity Net Gain (unless secured by condition);

- Nutrient Neutrality (credits reserved at Albion Water’s scheme located at Knowle Treatment Works);
- Community Worker / Employment and Skills Plan;
- Health;
- Travel Plan; and
- Transport and Highway works.

10.3. The Education Officer has advised through pre-application discussions that a contribution towards education locally is not required.

11 Planning Balance and Conclusions

Planning Balance

- 11.1. The Core Strategy (2011) and Site Allocations (2014) are both significantly out of date. As detailed above, the Council can only demonstrate 1.8 years supply, which is significantly below the requirement.
- 11.2. As a result under Paragraph 11(d) of the NPPF, the “tilted balance” is therefore engaged in favour of planning permission being granted for sustainable development, unless:
- the application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 11.3. As required under Footnote 7 in the NPPF, there are no areas or assets of particular importance that would be impacted by the development and therefore prevent the application of the tilted balance.
- 11.4. The proposed development offers the following significant benefits:
- Delivery of a longstanding housing allocation providing much needed housing for the Borough and Leigh Park in particular (very substantial weight).
 - Provision of at least 50% affordable housing which is in excess of the required 30-40% to help address the 1,557 current applications on Hampshire Home Choice (very substantial weight).
 - Provision of mix including family homes with private gardens (substantial weight).
 - All dwellings are designed to M4(2) and two apartments to M4(3) specification to maximise accessibility to the proposed units (substantial weight).
 - Open space, native-led landscaping and public realm enhancements to improve the appearance of the site within the wider streetscapes (substantial weight).
 - Improvements to the bus stop on Martin Road and pedestrian / cycle routes across Petersfield Road to Leigh Park to promote sustainable transport options, enhancing the sites sustainable location (substantial weight).
 - Reuse of a brownfield site (substantial weight).
 - Creation of local employment opportunities during construction (substantial weight).

- Sustainability measures (see paragraph 8.31) including EV charging points (substantial weight).
- Contribution to the vitality and viability of the existing services within Leigh Park to address the economic needs of the local area (substantial weight).

Conclusions

- 11.5. As detailed in the analysis above, the proposed development aligns with both national and local planning policy meeting Policy AL1. It is an allocated residential site (L145) in the adopted Site Allocations Plan (2014) and is also allocated in the draft Building a Better Future Plan (18).
- 11.6. The site comprises previously developed land in a sustainable urban location, providing an opportunity for efficient land use and helping to address housing current and future delivery- currently at 74% according to the 2023 Housing Delivery Test and the absence of a 5-year housing land supply (currently 1.8 years).
- 11.7. With nearby amenities, transport links, and green spaces, the site is well-placed to deliver a high-quality residential environment. Its allocation confirms that the principle of residential development is acceptable to the Council.
- 11.8. The scheme has been designed in accordance with relevant policies in the Core Strategy and Site Allocations document together with the draft allocation in the emerging Building a Better Future Plan.
- 11.9. Potential impacts have been considered and will be mitigated where necessary as detailed above.
- 11.10. In summary, the proposal is appropriate in principle and will contribute positively to local housing supply, support local economic activity, and strengthen the community.
- 11.11. The proposed development is in accordance with the Development Plan, will make a meaningful contribution to the supply of housing and, importantly, affordable housing in the Borough and see the development of a longstanding allocation. It should therefore be approved without delay.

Appendix 1 – Representations to Havant Borough Council Building a Better Future Plan Consultation

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Brighton

London

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Birmingham
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Oxford
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- Investment
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- Occupier Advisory
- Property Acquisition and Disposal
- Property Asset Management
- Property Development
- Consultancy
- Property Planning Consultancy
- Property Valuation



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Dear Planning Policy Team

Re: Representations to the Havant Borough Regulation 18 Version of the Building Better Future Draft Local Plan - Former Electricity Board Site, Bartons Road, Havant

We are writing on behalf of our client, Stonebond Properties (Guildford) Ltd ("Stonebond"), in support of Allocation 18: Former Electricity Board, Bartons Road. This letter of representation provides comments on the draft allocation and general policies within Havant Borough Council's ("HBC") draft Building a Better Future Plan.

Stonebond has an interest in the site and is seeking to redevelop the site for residential use (hereafter referred to as the "Site"), in accordance with the existing site allocation under the Havant Borough Local Plan (Allocations) 2014 (L145). A Location Plan is included at **Appendix A**. The site red line, allocation type and quantum have been maintained into the new Local Plan allocation (Allocation 18).

Our client is currently engaging with officers at HBC through the pre-application advice service in respect of a proposed residential scheme for the Site. Our client has appointed professional consultants to undertake site surveys and develop the design proposals for the site, which have informed our comments on the allocation.

Housing Allocation 18: Former Electricity Board, Bartons Road

We are supportive of the inclusion of this prominent brownfield site as a housing allocation within the draft Local Plan to meet local housing need. We are also supportive of the indicative yield of 90 homes – our constraints planning suggests this is achievable. We do, however, consider that some of the wording within the allocation requires updating / amending.

Key Features

As noted, the site was cleared following demolition under prior approval (APP/16/00940) in 2016, prior to Vail Williams and Stonebond's involvement in the site. One of the key features listed in the draft allocation is a Tree Preservation Order (TPO) tree on site. According to HBC's website, an individual lime tree is present on site, which is subject to TPO 1606. Our client's tree survey undertaken in August 2024 by Mark Welby confirms there is no such tree present on site (**Appendix B**). As such, the TPO tree should be removed from the list of key features.

Our client instructed BRD Environmental Ltd (BRD) to undertake Geo-Environmental Site Investigations between August and October 2024. This included 15 trial pits and 8 windowless sample boreholes evenly spread across the site. The report, which will be submitted in full with a future planning application, confirmed no unacceptable contamination in respect of human health, water resources, building materials or services. A summary report is provided at **Appendix C**. No remedial works are considered necessary. As such, the reference to contaminated land should be removed from the key features of the allocation.

BRD's Site Investigation report advises that the maps contained within BRE211:2023 'Radon: guidance on protective measures for new buildings' identify areas where no radon protection measures are necessary or where higher concentrations are present that either basic or full radon protection measures are required. BRD confirm that radon gas protection measures are not required – we would kindly request this be removed from the list of key features.

Allocation Requirements

a) Provide an ecologically sensitive lighting strategy;

Our client approved John Wenman Ecological Consultancy to undertake a Preliminary Ecological Appraisal (PEA) (September 2024) (**Appendix D**) which confirms there are no buildings, or mature trees present on site to support roosting bats. The onsite scrub and scattered trees, as well as the mature offsite trees on the northern and southern boundaries provide a commuting/foraging corridor for bats that has the potential to be important at a local level. As such, we agree the proposed development should incorporate a sensitive lighting scheme to prevent the indirect loss of the offsite treeline as a resource for commuting and foraging bats. This lighting strategy requirement should however have respect to the consideration of the urban setting particularly the neighbouring uses, for example the flood lit Westleigh Park to the east.

b) Provide improvements to the nearest bus stops;

Clarity is requested here as to the bus stop(s) to which the suggested policy wording applies. We look forward to hearing from the Local Planning Authority on this matter.

f) Provide radon mitigation measures if required;

As previously mentioned, BRD's Site Investigation report (**Appendix C**) confirms that radon gas protection measures are not required and therefore this allocation requirement should be removed.

g) Provide native-led landscaping, taking into account local distinctiveness and conservation priorities;

Upon reviewing the Council's Local Plan, we find the reference to "local distinctiveness and conservation priorities" to be unclear in relation to the site allocation. We request clarity on the terminology of this allocation requirement—whether it refers to particular habitat types, species or design principles—and how these priorities are intended to influence development proposals. Clearer guidance would support more effective and consistent integration of these principles into site-specific design and mitigation strategies.

h) Protect and enhance the open mosaic habitat on site;

We note the reference to Open Mosaic Habitat on Previously Developed Land (OMPDL). While the site was previously developed and has since been left unmanaged, John Wenman's PEA (September 2024) confirms that the site has only recently become vegetated. It was mostly unvegetated ground when surveyed in 2020

(as set out in Pro Vision's Ecological Appraisal, dated October 2020, which was submitted as part of a previous planning application - ref APP/20/00658) and developed land prior to this. Uniform blocks of scrub and grassland habitats are establishing and will dominate as the land is further left unmanaged. As such, while the site has some elements of OMPDL currently, the site does not fit all the five criteria for classification as priority habitat. This is particularly relevant in relation to there being more uniform blocks of habitat than the fine mosaic required by criterion 5, and the history of disturbance required by criterion 2, with development disturbing the site but no ongoing disturbance typical of industrial or transport sites with their ongoing operations and associated movement of materials for example. There lacks regular disturbance that maintains the fine mosaics of early successional habitats valuable to invertebrates. We therefore do not consider formal designation appropriate.

We would support a mosaic of habitats within the landscape design—such as native scrub, grassland, hedgerows, and scattered trees—balancing ecological value with safe, usable green space for residents. We kindly advise removal of reference to open mosaic habitat.

i) Retain the line of trees to the west of the site to protect the character of Petersfield Road;

The tree survey undertaken by Mark Welby (**Appendix B**) confirms the vegetation along the western boundary comprises bushes and minor trees. We would kindly request this be reflected in this allocation requirement. There is a minor conflict between this allocation requirement and draft requirement k) which requires improved pedestrian and cycle routes across Petersfield Road. This will require sections of the existing vegetation to be removed to facilitate these connections and improved permeability through the site. As such, we would kindly request this allocation requirement also acknowledges retention, where possible and that the word 'trees' is replaced with 'vegetation'.

j) Takes into consideration the locally listed buildings to the south of the site;

A review of Havant Borough Council's List of Buildings of Local Interest indicates that there are no locally listed buildings within immediate proximity of the site. The nearest locally listed buildings are Leigh Cottages (approximately 100m to the south of the site) and Prospect Farm House which is circa 0.75km to the north of the site. Leigh Cottages, the nearest Local Interest building, comprises three small groups of terraced houses (no.1-9 Petersfield Road). These cottages are separated from the site by a used car sales dealer, green space and a two storey detached dwelling. This physical separation combined with the setting of the cottages fronting onto a dual carriageway (Petersfield Road) leads to the consideration that the locally listed buildings would not influence the character of the site.

Based on this analysis, we respectfully request that Requirement J is removed as it is not considered to influence the design of this development.

k) Improve pedestrian and cycle routes across Petersfield Road to Leigh Park and l) Provide a cycle corridor on Bartons Road

Allocation requirements k) and l) should include wording relating to their deliverability being subject to design investigations including the practicalities of being able to provide these based on the existing site constraints such as trees protection zones and utilities.

n) Retain and integrate the protected tree on site.

As above, this should be removed as an allocation requirement.

Comment on General Key Policies

Where we have no comment on Local Plan policies we have remained silent on these within this representation. However, there are certain general policies we wish to highlight and provide comment on.

Whilst we are supportive of the provision of housing within **Policy 5: Amount of Housing**, it is concerning that the Council considers that the borough is only capable of providing 7,218 homes (361 per annum) over the plan period compared to the housing need requirement of 17,840 homes (892 per annum). This is a significant shortfall and it is felt that there is an opportunity here for the Council to be more ambitious in its plan making. The significant shortfall does, however, highlight the importance of the Former Electricity Board Site, Bartons Road being retained as an allocation for residential development.

Whilst we are supportive of measures being taken to improve health within the borough and combat climate change, we raise concern around the necessity of requiring a Health Impact Assessment (HIA) in **Policy 8: Health and Climate Change**. Our concern is that it is not clear what would be contained within a HIA that is not already provided within other documentation required for planning validation purposes. It is recommended that this part of Policy 8 is removed due to being an unnecessary requirement.

We support **Policy 11: The Role of Applicants and the Local Planning Authority in Delivering Development** and welcome the Council's commitment to proactive engagement with applicants to enable sustainable development. The emphasis on early consultation, particularly through pre-application advice, is a positive approach that promotes clarity and collaboration. We welcome working proactively with officers to deliver a high-quality development at the Former Electricity Board Site, Bartons Road.

While we support **Policy 13: Housing Density's** aim to optimise housing density, the policy would benefit from greater flexibility. The rigid minimum density thresholds may not suit all sites, particularly those with design, heritage, or access constraints. The term "artificially lowered density" also needs clearer definition to avoid ambiguity. Additionally, clearer guidance on the scope of 'Density Studies' would ensure proportionate requirements for all scales.

We support **Policy 19: Biodiversity Net Gain** for 10% Biodiversity Net Gain and flexibility around how this is delivered.

We fully support the aim of **Policy 32: Affordable Housing** to deliver affordable housing and encourage continued flexibility to ensure these targets remain achievable alongside other development requirements.

Conclusion

In summary, our client Stonebond Properties (Guildford) Ltd is supportive of Draft Local Plan Allocation 18 Former Electricity Board Site, Bartons Road for the indicative yield of 90 dwellings, subject to minor alterations to the wording of the policy text.

Our client also wishes to raise comment on some of the general policies within the Draft Local Plan particularly around general housing provision in the borough which is considered to be significantly low and further land should be allocated for residential development.

We look forward to confirmation that these representations are duly made.

Your faithfully

Ben Christian

Ben Christian MRTPI
Partner
For and on behalf of Vail Williams LLP
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Tel: 023 8082 0980

ENC – Appendices:

- Appendix A – Location Plan
- Appendix B – Tree Survey by Mark Welby
- Appendix C – Geo-Environmental Site Investigations Report by BRD
- Appendix D – Preliminary Ecological Appraisal by John Wenman Ecological Consultancy