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<i>Date</i>	28 October 2025	<i>Email</i>	havantdc@hants.gov.uk

For attention of Mr Eaves

Dear Sirs

Re: APP/25/00639 At Proposed Development site (former Electricity Board site), Bartons Road, Havant

Erection of 90 dwellings with associated landscaping, parking and improved access.

Thank you for your consultation on the above planning application. The Highway Authority wish to make the following comments.

Policy Status

The site is allocated under the existing adopted local plan under policy L145 with an indicative capacity of 90 dwellings. The site is also in the emerging draft local plan as allocation 18 for around 90 dwellings.

The emerging Local Plan Policy sets out the following requirements for the site:

- Improve pedestrian and cycle routes across Petersfield Road to Leigh Park Town Centre
- Provide a cycle corridor on Bartons Road

The site was previously recommended for approval under application APP/20/00658 with a package of improvements works which included:

- Right turn access arrangement
- Improved LTN1/20 compliant cycle provision at the Bartons Road/Petersfield Road signals

- Provision of a emergency access and pedestrian/cycle link to Martin Road including provision to connect this to the existing network
- Provision of a 3m shared use path from Petersfield Road to Martin Road to connect to the wider secured cycling provision along the Bartons Road corridor, connecting the site to New Lane employment area.

These measures have not been presented within this application, and a new consideration of the site has been undertaken.

Site Location

The site is located south of Bartons Road and East of Petersfield Road on the former SSE Offices site. Martin Road bounds the south of the site.

Sustainable Access

The site has been assessed against the walking distances set out in CIHT guidance however it does not reference the ATE requirements for a good level of goods and services being within an 800m walking distance.

Notwithstanding this table 3.1 of the Transport Assessment (TA) sets out that there are a number of core facilities within the 800m walking distance for the development and the Highway Authority have previously agreed that the site is within a location that subject to access improvements would be considered to be a sustainable location.

Walking and Cycling:

It is agreed that the site does benefit from its proximity to existing footway networks and segregated cycling facilities along the NCN route on Petersfield Road.

Sustrans however have a clear improvement plan for the NCN route along Petersfield Road which includes the provision of LTN1/20 compliant sparrow crossing provision on the Bartons Road arm of the Petersfield Road signal junction which required the holding of the left turn traffic into the junction. The design details can be found on drawing 106.0019.007 Rev J of application APP/20/00658 which accord with the Sustrans proposals.

Improvements have been proposed by the applicant on drawing 24-097/012 Rev A at this junction to facilitate walking and cycling however this doesn't align with the Sustrans vision and previously agreed scope of improvements under application APP/20/00658. The Highway Authority consider that the application should revert to the previously agreed scope of improvements at the junction for facilitating pedestrians and cyclists across Bartons Road.

Shared use provision has been proposed from the site access to Petersfield Road which is welcomed however audit items have been raised about these

works and the crossing provision on Petersfield Road which needs to be addressed.

No shared use or requirement for shared use provision has been identified between the site access and Martins Road despite pre-application advice setting out the expectations for this site to deliver the missing link along the Bartons Road corridor. The requirement is also within the emerging Local Plan allocation for the site. This provides onward cycle access to Prospect Lane for access to Havant Academy as well as to New Lane (employment area and onward connections to Havant Town) and Havant Garden Centre which includes a local convenience store provision. The Highway Authority have secured continuous shared use provision along the corridor and the final missing link from Petersfield Road to Martin Road is considered necessary for this development to provide in order to support the wider redevelopment of the Bartons Road corridor and the change of use to the route from industrial to residential.

The WCHAR has been provided however the review has only been undertaken from a desktop assessment. This is not considered appropriate and a WCHAR requires a site visit to be undertaken by the WCHAR assessment team. Deficits to the infrastructure and the existing condition along with consideration of any health streets parameters cannot be undertaken from desk top assessments alone.

A peak period pedestrian and cycle count has been undertaken at the Petersfield Road/Bartons Road junction with a total of 5 cyclists in the AM peak and 19 cyclists in the PM peak. Whilst these numbers are useful to understand existing patterns of use, they do not reflect daily use and, given the phased delivery of the Bartons Road corridor works, do not reflect suppressed demand from this area and the unbuilt development.

The WCHAR identifies Martin Road as route 4 of the LCWIP. This reference doesn't align with the Highway Authority's adopted Havant LCWIP which identifies this route as a secondary cycle route for only its most western end. Whilst this does give opportunities for integration with this route, improvements are identified within the LCWIP to this corridor and specifically on Martin Road which should be recognised within the WCHAR report.

The following improvements have been identified through the WCHAR work:

- Toucan crossing on Bartons Road at the Petersfield Road signals
- Connection from the development directly onto Petersfield Road
- Provision of a direct connection to Martin Road
- Cycle facilities at the proposed access between the site and Petersfield Road
- Resident cycle parking.

No narrative of the routes has been provided beyond the NCN corridor and the routes to the destinations identified within the report have not been wholly considered. A more thorough assessments of the routes is required.

Consideration should also be given to the previous WCHAR work undertaken here which identified the following:

- Missing footway provision on Martin Road between the proposed emergency access and the B2149 segregated footway/cycleway.
- Lack of formal crossing at Knightwood Avenue
- Missing shared use path provision between Petersfield Road and the Martin Road junction
- Petersfield Road/Bartons Road junction has a lack of controlled crossing facility on the Bartons Road arm

Buses:

The nearest bus stop provision is on Martins Road near Douglas Gardens. This is referenced as being 150m from the site however this is dependent on a link being created to the highway from the south of the site which should be secured. Clarity is required on the deliverability of this link which is referenced to be reliant on 3rd party land. In the absence of this link the walking distance to the nearest bus provision considerably increases to 600-750m. Bus service 20 runs every 20 minutes from Portsmouth to Havant.

There is also route 19 running on Bartons Road every hour which can be accessed at Forestside Avenue. Whilst not reliant on the Martins Road access and within a shorter walking distance, the frequency of this service makes the use of this route less attractive.

Proposals are presented to improve the eastbound bus stop on Martin Road to provide a shelter and seating area as well as bus cage road markings. There would be sufficient highway land to provide such infrastructure and the improvement is welcomed, however would only be beneficial to users of the site with the above connection secured.

Rail:

The nearest railway station is the Havant Station location 1500m from the site and accessible on foot or by bike with local improvements to the site as set out above.

Personal Injury Accidents (PIA)

Accident data has been provided and reviewed for the period 01 October 2019 to 30 September 2024. There are 14 recorded collisions none at the site access and 3 at the Petersfield Road/Bartons Road junction including 2 shunt accidents and a series injury accident involving the loss of control of a motorcycle.

There are also a number of accidents at the Petersfield Road/Stockheath Lane signals again relating to shunts and signal related accidents. Given the quantum of development it is not anticipated that the proposals will exacerbate these issues.

Vision Led Approach

The application sets out the vision for the site for an integrated and accessible transport system for walking, cycling and public transport as well as maximising the opportunities arising from the proximity to surrounding amenities for high quality active travel facilities and access to public transport, These are agreed as sound vision principles to consider the application against.

Site Access

The site access utilises the existing point of access onto Bartons Road and formalises the access arrangement into a standard bellmouth layout. This is shown on drawing 24-097-0012. Dropped kerb and tactile paving are proposed at the new access arrangement. The existing access to the football ground is retained. Reference is also made to a dedicated access travel link being provided on the boundary of the site. Comments in relation to its location and onward connectivity within the site are made in relation to the internal layout.

The Highway Authority appreciates that the existing access has accommodated previous use. However, the intended use changes the pattern of traffic and use of the junction. No narrative has been provided on whether these changes impact the peak hour assessments.

The football club access remains in its current position and this is not considered to be appropriate. Reference in the pre-application advice was for the access to the football club to be relocated further south, however no details were provided. The application proposals place the vehicle cross-over arrangement into the football club within 10m of the proposed bellmouth junction and conflict with the proposed crossing point. Visibility splays cannot be achieved appropriately for the access and the operational interactions are not acceptable.

The applicant should also be aware when considering the design of their access that as part of a nearby development, Land to the West of Havant Crematorium, a financial contribution has been secured to the Bartons Road/Petersfield Road junction in the form of extending the left turn lane on Bartons Road to circa 28 meters in length. The location of this access needs to ensure that there is sufficient distance and no safety issues with the relationship between the existing access and proposed improvement.

Visibility splays have been provided for the signed speed limit only. The speed survey data should be provided and visibility splays shown in accordance with TG3.

The creation of a staggered junction should ideally be a right left stagger arrangement. The visibility splays for the stagger should not interfere with each other. The proximity of the two junctions to each other is a concern in terms of the visibility interaction. In addition, tracking of the stagger arrangement should be provided.

The tracking drawing for the proposed access itself shows the body of the refuse vehicle oversailing the footway on the right turn into the junction which is unacceptable. The tracking of a refuse vehicle past a car at the junction should be provided and if this is not achievable suitable intervisibility should be shown between where they are able to pass. As this manoeuvre is not possible the more frequent movement of a large car and van should be shown.

The Highway Authority is concerned around the proximity and interaction between the proposed junction, the Knightwood Avenue junction and the Bartons Road/Petersfield Road signals. At pre-application stage the applicant was made aware that the junction access arrangement for the previous application raised no objection from the Highway Authority and that these should be adopted to support any new application. Given that the access proposal differ from the previously agreed position additional work needs to be undertaken to demonstrate that the junction will operate in a safe and suitable manner.

At a minimum the junction design regardless of the outcome of the above considerations should include 'keep clear' markings or a yellow box junction marking.

The footway/cycleway arrangement within the design has been moved alongside the channel line for Bartons Road. The existing arrangement has a section of verge between the footway and the carriageway. In the provision of the amended footway/shared use path provision given the level of traffic on Bartons Road an area of verge should be maintained where possible to a minimum of 1m.

Notwithstanding that the Highway Authority consider that the footway/cycleway should be extended to Martin Road, suitable on road provision should be provided for cyclists on Bartons Road to join the shared use provision.

Stage One Road Safety Audit (RSA1)

A stage 1 road safety audit has been undertaken for the site access and works to Bartons Road/Petersfield Road. A stage 1 road safety audit should also be provided for the internal road network given that this is a full application.

The safety audit raised a number of issues which have also been raised as a concern by the Highway Authority within this response. This includes:

1. The proximity of the football club access to the proposed bellmouth junction.

2. The construction make up of the football club access
3. Risk of conflict in upgrading the northern arm of Petersfield Road to a toucan crossing in the absence of cycle infrastructure on the western side of Petersfield Road.
4. Risk of undermining the existing established trees on Bartons Road in achieving the footway widening
5. Risk of low hanging branches on the southern side of Bartons Road creating a potential hazard to cyclists

The designers response does not accept the first problem which is not an agreed or appropriate position that the Highway Authority will accept. The historic use of the access for SSE offices does not represent the same pattern of traffic and therefore conflict risks associated with a residential development. The form of the access is also changing to support residential use of the site and therefore changing two vehicle crossover arrangements into a road with priority and a vehicle crossover in conflict with the new road alignment. The Highway Authority therefore support the audit's recommendation to relocate the access.

Point 2 can be addressed at detailed design stage. However, the impact on the trees may prevent matters 4 and 5 from being addressed and therefore these matters should be suitably considered at this stage to ensure the scheme can be delivered as presented.

Point 3 is not agreed by the applicant in that there is alternative crossing provision for cyclists. It is unclear whether the subway facilitates cycle access , and this should be confirmed. It is also unclear from the WCHAR and application evidence base if there is a need to provide the proposed toucan if the connections are not needed. The response to the audit report and evidence base for the TA do not currently align and the Highway Authority seek clarity on the assessed need for the proposed upgrade to the crossing provision for cyclists within the updated WCHAR assessment. At this time the priority for the Highway Authority with regards offsite highway improvements is the shared use footway provision from Petersfield Road to Martins Road, connection to Martin Road and the sparrow crossing of Bartons Road as set out within our pre-application response and agreed previously under application APP/20/00658.

Internal Road Network

General Layout

The internal road layout is proposed to be brought forward for adoption and the extent of the proposed adoption is shown in Appendix G of the TA. The road width is 5.5m in accordance with a secondary street and the footway provision is 1.8m A 1.8m footway falls short of our adoption requirements and the footway provision should be provided at a width of 2m as set out within TG2.

Generally, the internal layout is dominated by car parking. Some of which will cause points of conflict to those utilising the road network within the site. In

particular this is a concern where parking is located in close proximity to the two bends shown below (reversing vehicles in close proximity to the bend). Given that this parking area is also bound on the western side by soft landscaping there is a risk that vehicles will overhang into the live carriageway which would not be acceptable. The details around this area will be difficult to delineate with a need for a 25mm upstand kerb throughout to facilitate parking access and there appears to be very little material difference between the spaces.



There is opportunity to create a good permeable network within the site between Bartons Road and Martin Road however this is not accounted for within the layout to reduce walking distances for the site residents to the wider network. Direct and coherent routes should be provided to connect Martin Road with Bartons Road at both the site access and the northwestern corner. Cycling is proposed to follow the carriageway route with on carriageway cycling which again does not allow for direct permeability through the site and opportunities to create more direct north/south connections should be explored.

The access to Martin Road does not connect due to 3rd Party Land constraints. This was not an issue under previous applications, and it is unclear why this cannot be achieved. Reference is made to Portsmouth City Council providing the link, but it is unclear their involvement in the application. The site cannot be dependent on a link which cannot be secured through planning. Further discussions between all parties are required on this connection point.

There is a link through the site onto Petersfield Road about halfway down the eastern edge. This however is poorly connected with a narrow path from the public open space between back garden fences, no crossing provision shown and it is unclear that this is a cycle connection to a segregated footway/cycleway on Petersfield Road. The design of this should be in accordance with LTN1/20. It is noted in the design and access statement that the primary pedestrian route

through the site is via the narrow path bound by garden fences which does not appear to be the most attractive in terms of feeling safe. On the proposed site layout, it would also appear that this area has a section of steps, this should be clarified.



Text reference in the Planning Statement suggests there is a separate pedestrian and cycle connection to Bartons Road, but this is not shown on the plans nor is it connected through the apartment area of the site.

Drawing 24-097-007 Rev B has been provided showing the forward visibility for the development. It is unclear why visibility splays have been shown with a design speed of 15mph when the design is for a 20mph road. Some visibility splays clash with allocated parking areas which must be avoided. The forward visibility splays around the bends are not achievable within the limits of the highway and conflict with parking areas. Visibility splays should all be shown for a 20mph design speed unless within a tertiary street design. Within this drawing inset A and B shows the tracking for vehicle access to plot number 58's parking. This has to be done in several movements making access to this space clearly difficult. This is a concern to the Highway Authority as if spaces are inaccessible then on – street parking is likely to occur. The parking arrangement should be altered to provide an appropriate width to allow access to all spaces. For refuse vehicles drawing 24-097-008 Rev B has also been provided. There are a number of instances where the refuse vehicle is required to overrun the footways, clashes with parking spaces and the boundary treatment for plot 50. It is unclear where a refuse vehicle and a car can pass. Whilst this does not need to be possible throughout the layout there should be opportunities for vehicles to pass a refuse within the layout and suitable intervisibility between these areas.

Drawing 24-97-009 Rev B shows the fire tender tracking which shows similar conflicts as with the refuse tracking. It is also clear that if on street parking were to occur then the fire tender would not be able to navigate the internal road network. The applicant should consider how on street parking on the site can be managed to prevent obstruction of the refuse vehicle and emergency service movements.

The extents of highway adoption have been shown on drawing 24-097/015. At this stage this has not been reviewed in detail due to the required changes to the internal layout. It is a requirement for all visibility splays and forward visibility to fall within the adopted extents. Private parking areas must not be within the adopted highway. Permeable paving is referenced to be utilised in the parking areas which is noted at this stage but may require further consideration when the proposed adopted extents are confirmed.

The parking bays for plots 10-12 are shown as parallel bays to the rear of the footway provision. These spaces would not be adopted but there would be safety concerns regarding the interaction between footway users and those undertaking parallel parking manoeuvres.

Bin carrying distances should be reviewed by the Planning Authority. There would appear to be several that are beyond the recommended distances, may involve steps and crossing areas of landscaping.

Drainage

No drainage strategy has been provided for review. An infiltration investigation report has been provided for assessment which concludes the site is unsuitable for infiltration due to the high level of groundwater encountered (which would support previous investigations also mentioned in the report).

Whilst no strategy has been provided, the above would suggest that any drainage strategy is likely to be via a positive outfall to either a sewer or watercourse/ditch.

Where infiltration to be used the highway authority would look to ensure suitable standoff distances are provided from roads and structures. Given infiltration does not appear feasible there are no initial concerns to the highway authority at this stage but drainage strategy information should be provided given this is a full application.

It should be noted for any works within/proximity to the existing public highway and where the applicant appears to propose the internal roads for adoption, that the guidance as set out in HCC TG8-1 (and if applicable HCC TG8-2) is considered accordingly.

Street Lighting

The report suggests the internal layout and area proposed for adoption is to be illuminated and these roads are covered in the evaluation area. It should be noted that were the road to be put forward for adoption this would be assessed and approved at the Section 38 design audit stage. The approval of these details should be secured through condition and the applicant should confirm the intention to bring forward a street lighting strategy in accordance with the Highway Authority's requirements as set out in TG13.

Parking Provision

Both car parking and cycle parking is proposed to be delivered in accordance with Havant Borough Councils Parking Standards. Havant Borough Council as Parking Authority should confirm this is the case. At present given the concerns with the parking layout as set out above the Highway Authority is concerned over whether the required quantum can be achieved.

Cycle parking is proposed within the curtilage of the private dwellings within garden sheds and lit cycle stores as appropriate. It is unclear where visitor cycle parking is to be provided on the site.

Trip Generation

The proposed development is made up of 44 private dwellings and 46 affordable dwellings. The assessment has been based on these proportions and therefore the split should be secured through appropriate planning conditions or obligations to ensure the assessment is appropriate.

Multimodel trip assessments have been undertaken using the TRICs database which has generated the following rates:

Private Dwellings

- *Vehicle 0.445 in the AM peak and 0.418 in the PM peak*
- *Cyclists 0.011 in the AM peak and 0.016 in the PM peak*
- *Pedestrians 0.156 in the AM peak and 0.091 in the PM peak*
- *Public Transport 0.025 in the AM peak and 0.018 in the PM peak*

This is forecast to generate 20 vehicle trips in the AM peak and 18 in the PM peak.

Affordable Dwellings

- *Vehicle 0.316 in the AM peak and 0.491 in the PM peak*

The database did not have affordable trip rates for other modes and therefore the same trip generation for private dwellings has been utilised.

For affordable dwellings this generates 5 vehicle trips in the AM peak and 11 in the PM peak.

This generates a total of 29 vehicle trips in the AM peak and 36 in the PM peak with trips by sustainable modes being 23 in the AM peak and 13 in the PM peak. The daily trip rates for all modes have not been presented as requested at the pre-application stage. When assessing the quality of routes for walking and cycling consideration should be had to the overall daily trip generation forecast rather than the peak hours which are used generally for a capacity assessment of junctions. The daily trip rates should be presented for all modes.

The TRICs data utilised for the private dwellings includes at least 1 survey that was undertaken during COVID restrictions and this should be removed. Survey locations in Scotland should also be removed. The TRICs data for the affordable dwellings is agreeable however given it does not provide a multimodal trip rate and given the quantum unless the applicant is willing to accept planning restrictions of the level and type of affordable housing, once agreed the private dwelling trip rate should be used across the site.

Traffic Distribution/Assignment

Distribution has been presented based on data from Havant 009 clarity was sought on the assumptions around the distribution as a result of this data given that the information has not been presented to confirm the assumed distribution and it being different from the previously consented site. Confirmation is required on the assumptions behind the distribution used. It was previously agreed that 80% would turn left and 20% right from the site access.

Base Survey Data and Committed Development

Traffic surveys were undertaken in June 2025 covering each peak period including at the junction of Petersfield Road/Bartons Road. The survey data was utilised to form a baseline for traffic modelling with committed developments added as per the pre-application advice and TEMPRO background growth assumptions. The survey data has not been provided within the TA and should be included for assessment of the junction modelling and consideration of the junction form.

Narrative has been provided that the Campfield development did not distribute any traffic to the study area. This is not an agreed position. The impact of the site on the Bartons Road/Petersfield Road junction was assessed under the original Land West of the Crematorium application in Havant and a mitigation package secured in relation to these impacts as mentioned above, therefore the site must be included within the committed development.

The exclusion of 32 New Lane is also not agreed. The daily profile of trips differs from the consented use and the site is not fully operational so is not accounted for within the base survey data, the trips should therefore be manually applied.

Southleigh Park has not been operational and therefore the trips are not accounted for within the base survey data and should be manually added.

Downley Road site is not operational and trips should be manually applied.

Background Traffic Growth

TEMPro has been utilised to establish background traffic growth assumptions which generates figures of 1.0436 in the AM peak and 1.0439 in the PM peak.

Confirmation is required on which growth assumption has been utilised to generate these figures before they are agreed.

Junction Assessments

The TA sets out the modelling forecast scenarios which are agreed with a base year of 2025 and forecast year of 2030.

Bartons Road Site Access

Modelling has been provided for the site access demonstrating the junction to operate within capacity. The applicant states they have considered the need for a right turn lane based on these capacity assessments. However the previous requirement for the right turn lane was as a result of concerns of delays to right turning movements as a result of queues from the Bartons Road/Petersfield Road junction and whether a right turning vehicle into the site would create blocking back into the signal junction.

The flows on Bartons Road have been recorded previously as meeting the requirements of considering the need for a right turn lane. The traffic count data and AADT should be provided.

Petersfield Road/Bartons Road Signals

The results of this junction assessment differ from those previously agreed for consented schemes and those previously presented for this site through the previous application.

Given that the junction footprint has not been agreed the modelling has not been reviewed in any detail.

In order for the Highway Authority to undertake a full review of this junction assessment work the modelling files should be shared directly with the Highway Authority. From an initial view it is apparent that the phases for the toucan have not been included in the signal timings and therefore the modelling results are not presenting a correct assessment of the junctions operation. It has previously been agreed that the pedestrian/cycle crossing demand is called every other cycle and this remains a robust assumption.

Travel Plan

The application is supported by a residential travel plan however falls below the required scale of development which would require such a plan. The applicant should confirm under what provision the travel plan has been submitted.

Recommendations

The Highway Authority require additional information on the application. If the Planning Authority are minded to determine the application in the absence of this information, please contact me for my formal recommendation.

Yours faithfully,

Holly Drury
Principal Transport Planner - Highway Development Planning
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