

Addendum to Planning Statement

Former Electricity Board Site, Bartons Road, Havant

Planning Application Reference APP/25/00639

Report date: December 2025



Prepared for:
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Limited

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1 Introduction

- 1.1 This Addendum to the Planning Statement has been prepared by Vail Williams LLP on behalf of Stonebond Properties (Guildford) Limited (“Stonebond”) in respect of their full planning application at Bartons Road, Havant, which is currently being considered by officers under reference APP/25/00639.
- 1.2 This Addendum accompanies revised plans and documents which have been produced following meetings with the case officer and housing officer in November 2025. The material has been developed following submission of concept plans to the planning officer and seeks to address consultee comments.
- 1.3 The information that accompanies this Addendum is as follows:
 - Site Plans:
 - Proposed Block Plan (6087-1100 Rev D)
 - Net Developable Area Plan (6087-1120 Rev B)
 - Boundary and Dwelling Material Layout (6087-1150 Rev C)
 - Illustrative Site Plan
 - Proposed Site Sections
 - Landscape Surfaces Finishes Plan (2445 (08) 0101 P07)
 - Illustrative Landscape Plan (2445 (08) 1050 P00)
 - Floor Plans and Elevations;
 - Apartment Floorplans (GF & FF / SF & TF / Roof)
 - Apartment Elevations (Sheet 1 & 2)
 - House Type M2.3 (supersedes M2.9)
 - House Type M3.11 (plot numbers / handing update only)
 - House Type M3.12 (plot numbers / handing update only)
 - House Type M3.13 (plot numbers / handing update only)
 - House Type M4.12 (supersedes M4.11)
 - Drawing Register;
 - Schedule of Accommodation;
 - Lighting Assessment (to follow);
 - Noise Assessment Rev 1;
 - Flood Risk and Drainage Addendum;
 - Transport Assessment Addendum (incl. drawings and parking strategy note Parts 1 & 2);
 - Nutrient Neutrality - Nutrient Budget Calculator and Occupancy Calculator;

- Energy and Sustainability Statement (reflecting revised house types); and
- Biodiversity Net Gain Assessment and Metric.

2 Key Design Changes to the Application Plans

2.1 The key design changes are as follows:

- Additional landscaping along the Petersfield Road frontage to give a verdant character;
- Car parking to meet Havant Borough Council (HBC) standards, which has been rearranged to break up long rows of parking with landscaping;
- Private shared amenity space northwest of the apartment block to supplement balcony provision for the apartments;
- Centralised play space set back from dwellings with good natural surveillance;
- Realignment of the internal road layout to ensure efficiency, permeability and avoid the internal layout being dominated by car parking;
- Pedestrian/cycle link to the south to Martin Road;
- Repositioning of the secondary access to the football club;
- Introduction of a right turn lane at the Bartons Road site access;
- Provision of a 3m shared use path from Petersfield Road to Martin Road to connect the wider secured cycling provision along the Bartons Road corridor;
- Introduction of 3-bed affordable rented dwellings to meet local need;
- Dwellings fronting Bartons Road and Petersfield Road to provide active frontages; and
- Rearrangement of dwellings to provide continuous housing frontages along the northern and western boundaries to act as physical noise barriers.

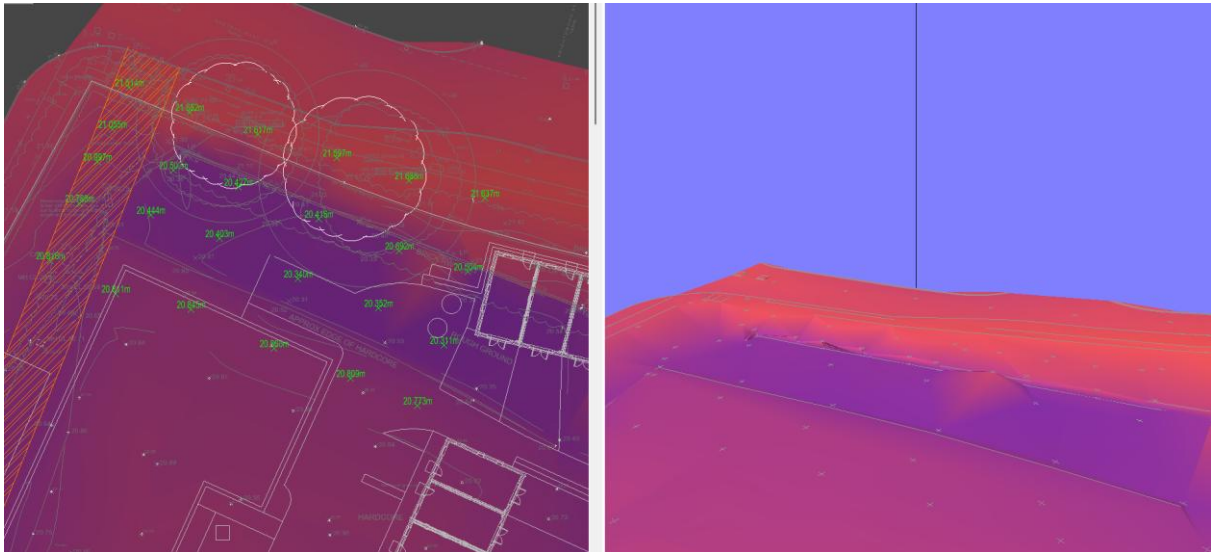
3 Explanation of Changes and Responses to Consultee Comments

Landscape

- 3.1 The site was allocated in 2014 prior to the emerging open space policy (Policy 50). It was therefore never envisaged that the site would need to deliver the quantum of open space set out in the emerging local plan. Compliance with Policy 50 based on a 2.5-person multiplier would result in a requirement for 0.72 ha of open space, 0.12 ha of play space and 0.36 ha of outdoor and recreation space. This would only allow for circa. 6 no. dwellings as shown by the enclosed plan (ref: 6087-SK005).
- 3.2 The emerging policy requirements are out of sync with the allocation requirements. Given the Council's lack of 5-year housing land supply, we are of the view the proposed dwellings would be afforded significant weight in the planning balance, particularly as the site is allocated.

- 3.3 Nevertheless, open space is provided on site and the site is surrounded by larger public open spaces. The nearest public open spaces to the site are as follows:
- Westleigh Park (approximately 150 metres to the east of the application site);
 - Green Recreation Ground (800 metres east of the application site);
 - Front Lawn Community Hub/Leigh Park children's playground (nearest access is approximately 300 metres west of the application site); and
 - Staunton Farm and Country Park (nearest boundary is 680 metres north of the application site).
- 3.4 The above demonstrates that there are a number of alternative, larger areas of open space within short distance of the application site, in addition to the open space proposed on the site.
- 3.5 It should be noted that the officer's consideration of the previous application on the site (APP/20/00658), as detailed in the officer's report, acknowledged that adopted local planning policy does not specify the quantum of open space required for housing development and, furthermore, the allocation does not set specific requirements for open space. The amendments to the layout as described above facilitate a centrally located open space together with incidental areas throughout the site and these improvements should be considered positively.
- 3.6 Concern was raised that the boundary landscaping on the site did not reflect the character of the surrounding area, principally along Petersfield Road. The architect has undertaken a study of the landscaping along Petersfield Road and has produced a plan showing that there is not a continuous landscape buffer along Petersfield Road, including the application site. This is shown on the enclosed plan titled Petersfield Road Lining Character Appraisal. However, as part of the revisions to the proposals, additional landscaping along the Petersfield Road boundary has been proposed to help improve the streetscape. This should be considered as a significant benefit of the scheme.
- 3.7 To further address concerns raised by the landscape officer, the following changes have been made to the site layout:
- Car parking is now broken up with planting, ensuring that there are no more than 6 spaces without a break;
 - The play area has been relocated to a centralised location set back from dwellings. This location is more accessible to all residents and well overlooked;
 - Boundary treatments which are prominent within the street scene comprise brick detail;
 - Dwelling separation distances have been respected in line with the HBC Design Guide SPD, with back to back distances meeting the 20m requirement, and back to side 10m.

- 3.8 The landscape officer requested a pedestrian link at the northwest corner of the site. This cannot be accommodated as the level difference in this part of the site is approximately 1.25m as shown below.



- 3.9 Over approximately 15m, this would equate to a 1 in 12 gradient. DDA compliance requires no greater than 1 in 20, which would need to be provided over a distance of 25m for that level difference. As such, we have not been able to accommodate this request within the site layout. However pedestrian links are provided along Petersfield Road, Bartons Road and Martin Road to ensure sufficient permeability.
- 3.10 The landscape officer also raised concern with respect to the proposed block of flats and distances to neighbouring properties. The proposed 4 storey block is at least 45m from all existing dwellings across Bartons Road and Petersfield Road.
- 3.11 As part of the redesign, 2.5 storey dwellings have been orientated facing the flats block on its eastern side, however it should be noted this is a front-to-front arrangement. The minimum distance from the flats to these dwellings is in excess of 15m, increasing thereafter. This is considered acceptable and has been adopted elsewhere within the Borough (e.g., Bosham Gardens, as shown below).



- 3.12 To the south of the apartment block are 2 storey houses. Windows are at least 25m from the 3-storey element of the flats (>24m requirement) and 28m from the 4-storey element. Therefore, when considering back-to-back distances, these would comply when allowing for an additional 4m per storey.
- 3.13 To the northeast of the apartment block are 2.5 storey houses. The side window of Plot 26 is 17m from the corner of the 3-storey element of the flats (>12m requirement) and 19m from the 4-storey corner element (>16m requirement). Therefore, these plots comply when allowing for an additional 4m per storey (2m per half a storey).
- 3.14 The applicant has worked hard to provide sufficient parking for the development, balanced by the need to soften the character of the parking areas by introducing additional planting. This should be balanced against maximising the efficient use of this sustainably located brownfield site and increasing housing delivery where the tilted balance applies given the deficient housing land supply position.

Biodiversity Net Gain

- 3.15 The revised layout seeks to maximise landscaping to the benefit of biodiversity as well as address the landscape officer's comments. The design team have sought to provide on-site habitats as the first choice for some replication of Open Mosaic Habitats.
- 3.16 We have also been investigating options for off-site BNG to ensure the development meets the mandatory 10% BNG. A common issue that was raised in the Ecologist's response, is the limited available off-site options for like-for-like compensation of Open Mosaic Habitat. There are none within Havant Borough, and very limited options elsewhere nationally and therefore within the BNG process there is a degree of flexibility for LPAs in agreeing compensatory, habitats.
- 3.17 The alternative options are very much restricted by the habitats available that can be purchased from habitat bank providers in the NCA. As a potential alternative, our client's ecologist is recommending the following compensation which will provide the same function as the baseline habitats on site as follows:
- 5% pond-priority habitat (similar function to temporary pools);
 - 32% scrub (similar function to ruderal vegetation on the edges); and
 - 63% grassland (same function as the remainder of the area which has flower-rich grassland and bare ground).
- 3.18 These percentages require to 0.27 pond units; 1.62 mixed scrub units; and 2.74 other neutral grassland units (all in moderate condition).
- 3.19 The Applicant has managed to locate these units at Halnaker Hill Farm, which is within the same NCA as the site, South Coast Plain, therefore keeping any offset as local as possible.

Highways and Parking

Site Access

- 3.20 The proposed junction arrangement at Bartons Road has been reconsidered including relocation and realignment of the secondary access to Havant and Waterlooville Football Club, which has been agreed with the club. This car park is used solely for staff and player parking. The Applicant is also in conversation with Portsmouth City Council (PCC) as landowner, however the bellmouth will be delivered within land under the Applicants control as shown on the enclosed plans.
- 3.21 In addition, the design for the site access and up to Petersfield Road has changed significantly from the original submission to respond to comments made by HCC Highways. The scheme closely aligns to the

scheme previously agreed with HCC Highways as part of the previous application on the site. The main changes are as follows:

- Provision of ghost island right turn facilities into site and Knightwood Ave;
- Provision of north-south cycle crossing facility across Bartons Rd arm as per Sustrans proposal;
- Retention of informal crossing facilities on Petersfield Rd (N) arm;
- Provision informal crossings (tactile paving and dropped kerbs) across Knightwood Ave and Bartons Rd (incl. splitter island); and
- Minor alterations to the traffic signal operation at the Petersfield Rd / Bartons Rd junction to accommodate the new crossing facility outlined above.

Martin Road

- 3.22 Conversations have also taken place between PCC and Stonebond to deliver a pedestrian / cycle access to the south to Martin Road, as there is a strip of land owned by PCC between the Applicants boundary and the highway boundary. The Applicant is in the process of securing a licence agreement with PCC to carry out any works as necessary to tie in the application site with Martin Road. This will allow residents to access the bus stop on Douglas Gardens where the Applicant is proposing improvement works to the eastbound bus stop on Martin Road including a shelter and seating area as well as bus cage road markings.

Walking and Cycling

- 3.23 Shared use provision is proposed between Petersfield Road, the site access and Martin Road to deliver the link along the Bartons Road corridor. This accords with the requirement in 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.
- 3.24 An updated WCHAR has been provided following a site visit as requested by HCC Highways. The following improvements have been identified through the WCHAR work:
- LTN 1/20 compliant sparrow crossing over the Bartons Road arm;
 - 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; and
 - Resident cycle parking.
- 3.25 The proposed crossing will help to provide pedestrian and cycle routes across Petersfield Road in accordance with the emerging Local Plan allocation for the site.

Internal Road Network

- 3.26 The internal road network has been redesigned to ensure efficiency, permeability and to avoid the internal layout being dominated by car parking. The design creates a permeable network within the site between Bartons Road and Martin Road to reduce walking distances for the site residents to the wider network. Cycling is proposed to follow the carriageway which provides direct permeability between Bartons Road, Martin Road and Petersfield Road.
- 3.27 The majority of the internal road network is proposed for adoption, given this is an affordable-led housing scheme. The main carriageway proposed for adoption is 5.5m and the footway provision 2m, in accordance with HCC Highways adoption requirements as set out in TG2.

- 3.28 Updated tracking plans are submitted alongside this Addendum including for refuse and fire tender. The tracking plans accords with Approved Documents B and H. Refuse storage is provided within the curtilage of dwellings within gardens. The apartment block has a dedicated refuse store. Drag distances have been carefully considered for each plot and meet the required standards as set out in the Transport Addendum.
- 3.29 The Lighting Assessment (to follow) demonstrates the street lighting strategy which is in accordance with HCC Highways requirements set out in TG13.

Car and Cycle Parking

- 3.30 The revised layout meets Havant Borough Council's parking standards as set out in the parking assessment submitted. The site provides 146 resident spaces along with 30 visitor spaces. The parking assessment also analyses census data for the area, which further demonstrates the quantum of parking is sufficient.

	No.	Car Parking Requirement		Cycling Parking Requirement	
1 Bed Flat	11	0.9 spaces	9.9	1 space	11
2 Bed Flat	21	1.3 spaces	27.3	2 spaces	42
2 Bed House	12	1.3 spaces	15.6	2 spaces	24
3 Bed House	36	1.9 spaces	68.4	2 spaces	72
4 Bed House	10	2.4 spaces	24.0	2 spaces	20
Totals	90	146 spaces		169 spaces	
Visitor Requirement		30 spaces (20%)		34 spaces (20%)	

- 3.31 Cycle parking is proposed within the curtilage of private dwellings within gardens sheds. A lit cycle store is provided internally within the apartment block, which can hold 46 cycles with a further 18 spaces provided externally, achieving the required 64 spaces for the apartments.
- 3.32 The sustainability credentials of the site are reflected in the officer's report to the previous application. This acknowledged that where parking provision meets the standards in terms of resident spaces, flexibility could be considered with respect to visitor parking and therefore the total quantum of parking was considered acceptable. The report for that application commented further that given the relatively sustainable location, encouraging non-car based journeys and lower car ownership in the vicinity is not, on balance, considered a viable reason for refusal that could be substantiated. This is also the case for the current application.
- 3.33 As discussed during our meeting, the site is not used for match day parking and will be managed on match days to ensure the residential parking is not compromised. The details of this could be secured as part of the s106 legal agreement.

Drainage

- 3.34 The surface and foul water drainage strategy has been updated in line with the revised site layout.

Surface Water

- 3.35 The design reduces surface water run off to greenfield rates, reducing the total surface water runoff from the site from an existing estimated 520 l/s in a 1 in 100-year storm event to 6 l/s, providing a significant betterment.

- 3.36 In response to a pre-application enquiry, Southern Water indicated that there was inadequate capacity within the local sewerage network to accommodate flows from the development. They noted that SuDs should be included in any drainage strategy in accordance with Part H3 of the Building Regulations. In their consultation response to the planning application, Southern Water do not object to the proposals within the FRA to connect surface water flows from the site to the offsite surface water sewer, subject to introduction of a suitable sustainable drainage system.
- 3.37 Although the soakage investigation undertaken by BRD stated that infiltration in some areas of the site may be “technically feasible”, it went on to say that subsequent ground water monitoring indicated that ground water levels could be as shallow as 1.0 metres below ground. This would not provide a sufficiently deep unsaturated zone between the base of any infiltration device and the ground water level to satisfy the Environment Agency (EA).
- 3.38 The site sits within a Source Protection Zone 1 into which the EA would not permit infiltration given the previous site uses and Portsmouth Water have in their consultation response noted their objection to the use of soakaways on this site. There is therefore no opportunity to use infiltration on the development.
- 3.39 The previous application, which was recommended for approval, did not allow for any infiltration. Their drainage strategy, like the current application, proposed permeable surfaces with storage and a piped network.
- 3.40 The FRA and Drainage Addendum provides a detailed response to the LLFA’s comments.

Foul Drainage

- 3.41 In their consultation response to the planning application, Southern Water commented that there is currently capacity of up to 51 dwellings. The Applicant met with Southern Water on 17th November to discuss foul capacity which led to a follow up response dated 18th November. During the discussion, Southern Water expressed surprise that the case officer had concerns based on their consultation response. Southern Water confirmed that any related planning conditions are unnecessary given Southern Water’s statutory obligation, under the Water Industry Act 1991, to provide capacity and considering a plan and funding for the reinforcement works are already in place.
- 3.42 During the meeting, Southern Water advised that, in terms of operational changes, they are continuing to remove ground and surface water from the current sewerage network to free up capacity. Reducing the surface water run off rate at Bartons Road from its current uncontrolled run off rate to greenfield run off rates as above will inevitably assist with this.
- 3.43 Southern Water have highlighted the planned works to Budds Farm catchment which is included in AMP 2025-2030. A budget of £7.66 million has been allocated for reinforcement works within this catchment which is expected to positively impact this development and others connected to the Budds Farm wastewater treatment works. It can therefore be concluded that both connections to and sufficient capacity for drainage will be provided at the time of connection of the full 90 dwellings.

Design & Amenity Space

- 3.44 The allocation states “A landmark residential building reflecting the scale of the existing building on the site could be achieved”. The proposed apartment block has been designed to a high standard and sited in a prominent position on the site to provide a ‘landmark’ status.
- 3.45 The width of Petersfield Road means that the proposed dwellings on site will not adversely affect any properties to the west.
- 3.46 All houses will have private gardens. HBC’s Design Guide SPD states garden lengths should *normally* allow 10m between the dwelling and the boundary. Site constraints and dwelling orientation mean that gardens may not always be square. Therefore, to confirm compliance with this guidance, we have taken the narrowest dwelling width and multiplied this by 10m. This confirms gardens should exceed 49m². All

gardens have been measured and only 2% of dwellings are 82-88% of this requirement and 7% are 90-96% of this requirement. This is considered acceptable in the context of this development.

- 3.47 The Design Guide SPD states that apartments should incorporate balconies **where possible** and that all dwellings should have a private amenity which can include a **private shared space**. Balconies are provided along the eastern and southern boundary of the apartment block. Legal and drainage easements along the northern and western boundary of the site mean balconies cannot be provided on the northern and western sides. Therefore, these apartments will have private outdoor space for ground floor apartments. A private shared space shall be provided for the remaining apartments, which is now sufficiently screened by landscaping from Bartons Road and Petersfield Road.
- 3.48 The previous applications officer's report stated that it was considered that the balconies, ground floor external amenity space and areas of open space would meet adopted policy requirements and provide appropriate external amenity space for future residents. A similar mix is proposed in the revised plans and therefore should be considered acceptable. This is in addition to the proximity of existing open spaces of varying types within approximately 800 metres of the application site as set out above.
- 3.49 To address officer comments on the comparable heights between the proposed apartments and surrounding dwellings, site sections are submitted in support of this addendum which officers will note demonstrates that adverse impacts will not occur as a result of the proposed layout.

Noise

- 3.50 The dominant noise sources are the road traffic noise from the B2149 and Bartons Road and mechanical / plant noise from the adjacent SSE building. The development layout positions sensitive areas of the residential properties away from the surrounding noise sources, as far as practicable and within the project constraints.
- 3.51 The internal road network has been redesigned so that dwellings are further set back from the SSE building. This reduces as far as practicable negative effects with respect to noise and visual impact.
- 3.52 The Applicant has sought to achieve a more effective acoustic outcome by incorporating continuous housing frontages along the northern and western boundaries, where possible, to act as physical noise barriers and shielding internal areas of the site from the dominant noise sources.
- 3.53 In addition, 2.4m high acoustic fencing / brick wall is provided to gardens of more sensitive plots including to the north of plot 1, and the east of plots 11 and 52.
- 3.54 Acoustically upgraded façade elements (glazing and ventilation) shall also be used in selected areas to reduce noise levels inside the habitable rooms.
- 3.55 The above demonstrates the layout and orientation of dwellings achieves the optimum acoustic design whilst considering the site constraints.

Housing Mix

- 3.56 The layout still achieves 90 dwellings including 58 houses and 32 flats. The mix of dwellings is in broad compliance with the requirements of Core Strategy Policy CS9 which requires a “mix of dwelling types”.

Type	SHMA % (October 2023)	Proposed No.	Proposed %
1 Bed	8	11	12%
2 Bed	25	33	37%
3 Bed	46	36	40%
4 Bed	21	10	11%

- 3.57 The above mix provides a variety of dwellings in both apartments and houses, with 1-4 bedrooms. The majority of dwellings are 2 and 3 beds, in line with the need as outlined in the SHMA.

Affordable Housing

- 3.58 The Applicant team met with the housing officer on 12th November to discuss the outstanding consultee responses from the housing team.
- 3.59 Stonebond proposed to provide at least 50% affordable housing which was supported. The principle of 100% affordable housing on the site was discussed. The Applicant intends to ensure that the legal agreement does not preclude the provision of a fully affordable scheme and we will work with officers and the Council’s legal team to ensure that an appropriate s106 agreement is drafted. This could be either using ‘at least’ wording or the Option A / Option B approach.
- 3.60 From discussions with the housing officer, it is understood that the tenure in highest demand is affordable rent / social rent. Overall, 45 affordable dwellings are provided broken down into 36 affordable / social rented dwellings (80%) and 9 shared ownership dwellings (20%) across a range of 1-4 bed properties.
- 3.61 The housing register in the Borough currently has 74% of applicants requiring 1 or 2 bed properties. The proposal seeks to address this by providing 88% of rented dwellings as 1 or 2 bed homes. The housing officer requested the mix for the affordable / social rented dwellings included some 3-bed homes, which has now been addressed.

Nutrient Neutrality

- 3.62 As discussed in our meeting the Applicant has secured up to 90 kg TN/yr (nitrate credits) via Albion Water’s scheme at Knowle, and evidence of this has been provided.
- 3.63 An updated occupancy and nutrient budget calculator have been provided alongside this Addendum. This confirms the scheme requires 82.61 kg TN/yr when assuming a water usage of 110 l/p/d or 88.87 kg TN/yr for 120 l/p/d.
- 3.64 The Energy and Sustainability Report submitted alongside the application confirms the dwellings will be designed to 110 l/p/d in accordance with draft Policy 18, and therefore the Applicant would like to seek a compliance condition to reflect this, so that 82.61 kg TN/yr can be secured.

Remaining Consultee Responses

- 3.65 As discussed at the meeting there are a number of outstanding consultees responses as follows:

- Climate Change;
- Environment Agency; and
- Economic Development Officer – as discussed comments are likely to be in relation to the requirement for an employment and skills plan and will be contained in the s106 agreement.

Should these be required prior to determination we would be grateful if you could follow up. Where these may be addressed via planning condition and / or s106 obligation we would be happy to discuss.

4 Conclusions

- 4.1 The above and accompanying documentation has been drafted to address outstanding officer comments. We trust that the amendments will be considered favourably by officers and consultees alike.
- 4.2 It is considered that the residential development of the site with significant affordable housing provision, revised open space, revised private amenity space, additional landscaping and significant layout amendments will address officer comments and, in the context of the tilted balance, lead to a positive recommendation for planning consent.

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