

## DRAFT DELEGATED OFFICER REPORT

|                                  |                                                                                           |
|----------------------------------|-------------------------------------------------------------------------------------------|
| <b>PROPOSAL</b>                  | <b>Erection of 90 dwellings with associated landscaping, parking and improved access.</b> |
| <b>LOCATION:</b>                 | Proposed Development site (former Electricity Board site), Bartons Road, Havant           |
| <b>REFERENCE NO:</b>             | APP/25/00639                                                                              |
| <b>APPLICANT:</b>                | c/o agent                                                                                 |
| <b>APPLICATION TYPE:</b>         | Full planning permission                                                                  |
| <b>CONSULTATION EXPIRY DATE:</b> | 10/04/2026                                                                                |
| <b>APPLICATION EXPIRY DATE:</b>  | 16/12/2025                                                                                |
| <b>WARD:</b>                     | Leigh Park Central and West Leigh                                                         |
| <b>SUMMARY RECOMMENDATION:</b>   | <b>Approve with Conditions</b>                                                            |

### 1. Site Description

- 1.1 The site is the former Electricity Board site, Bartons Road, Havant which was previously occupied by Scottish and Southern Energy and included a three storey 'C' shaped office building, Data Store and other ancillary buildings. The site is located approximately 1.7km north of Havant Town Centre and approximately 0.6 km east of Leigh Park Centre.
- 1.2 The original buildings were demolished in 2017 and the site has been mainly levelled but with a significant area of banked spoil from the demolition work.
- 1.3 The site lies to the south of Bartons Road and to the east of Petersfield Road. The area is mixed in character with the following surrounding uses:

*North* – Bartons Road with an area of landscaping including trees fronting Petersfield Road to the western part and terraced two storey residential properties to the eastern side. Knightwood Avenue is also opposite the site.

*East* – Havant and Waterlooville Football Club is to the east with the stand backing onto the northern part of the site and other ancillary buildings. The Westleigh pub is also located adjacent to the football ground but is separated from the application site by retained SSE facilities including a two storey Data Centre, disaster recovery office and Alarm Reporting Centre (ARC) with associated car parking accessed off Martin Road.

*South* – To the south are areas of landscaping with significant trees to the north of Martin Road and two storey semi-detached properties south of Martin Road. To the south-western boundary of the site is Solent Used Car Centre including car repair/MOT garage.

**West** – To the west is Petersfield Road (B2149), the road adjacent to the site has a central reservation and is mainly two lanes incorporating turning lanes. To the western boundary is also a cycle path and pedestrian route. Beyond Petersfield Road are some significant trees and residential properties including a large block of three storey flats and two storey flats / maisonettes.

1.4 There is a natural slope across the site generally from north to south. There are significant trees beyond the site boundaries and the site is generally open but with one tree which appears to be on site close to the Garage complex to the south west.

1.5 The application has been submitted with the following supporting information and further information has been submitted during the course of the application:

- Design and Access Statement
- Planning Statement
- Statement of Community Involvement
- Phase 1 Geo-Environmental Desk Study
- Phase 2 Geo-Environmental Site Investigation
- Archaeological Desk Based Assessment
- Air Quality Constraints and Opportunities Appraisal
- Arboricultural Report
- Nutrient neutrality allocation agreement
- Biodiversity Metric Calculation
- Biodiversity Net Gain Assessment
- Nutrient calculator
- European Site avoidance and mitigation checklist
- Schedule of Accommodation
- Preliminary Ecological Appraisal
- Noise Assessment
- Utilities Statement
- Havant Occupancy Calculator
- Energy and Sustainability Statement
- Addendum to Planning Statement
- Flood Risk Assessment and Drainage Strategy
- Soakage Investigation
- Response to LLFA
- Transport Assessment
- Transport Assessment Addendum
- Travel Plan (N.B. HCC Highways have confirmed that a Travel Plan is not required for this scale of development)

## **2. Planning History**

2.1 There is significant planning history in relation to the former use of the site by SSE and whilst this sets the context of the site and its nature as previously developed Brownfield land, the detailed history is not included here. The most recent history relevant to the current condition of the site and the previous proposals for residential development is set out below:

APP/16/00940 Application to determine whether prior approval is required for the method of demolition and site clearance of Former SSE Building, Bartons Road, Havant. Prior Approval Required and Granted 6th October 2016

APP/16/00617 Increase height of security fencing (perimeter west) by 600 mm for a length of 126 metres. Permitted 26th October 2016

APP/20/00658 Proposed development of 175 apartments together with associated access, parking and landscaping. Refused 19<sup>th</sup> October 2022 for following reasons (summary):

- Lack of Affordable Housing
- Overdevelopment
- Out of keeping with character of the area
- Lack of S106 Agreement

Adjacent SSE site:

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. (Revised application.) Permitted 13th June 2008

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. Permitted 24th April 2007

06/50018/026 Formation of two storey data centre, disaster recovery office and ARC with associated car parking and access to Martin Road. Permitted 30th May 2006

### **3. Proposal**

- 3.1 Erection of 90 dwellings with associated landscaping, parking and improved access.
- 3.2 The development is proposed to be accessed via an existing altered access point to the north east corner of the site. The main spine road then runs from north to south along the eastern side of the site adjacent to the football ground and SSE's retained data centre and other buildings.
- 3.3 A spur road would run from east to west with further spurs serving apartment buildings and residential houses to the north and a further spur running south to serve residential houses. Finally a further spur to the southern part of the site leads to other properties from the main spine road.
- 3.4 A linking cycle/pedestrian route is shown to the southern boundary linking to Martin Road and beyond links towards the town centre and Railway station. There are incidental areas of open space along the Bartons Road and Petersfield Road frontages. A small Local Area of Play is proposed to the centre of the site.
- 3.5 The development would comprise of a block of apartments in the north-east corner of the site (close to the junction of Bartons Road and Petersfield Road). The remainder of the development would comprise terraced and semi-detached dwelling houses. The mix of development is as follows:

| <b>1 Bed</b> | <b>2 Bed</b> | <b>3 Bed</b> | <b>4 Bed</b> |
|--------------|--------------|--------------|--------------|
| 11           | 33           | 36           | 10           |
| 12%          | 37%          | 40%          | 11%          |

There would be 32 apartments within the development.

#### **4. Policy Considerations**

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the Planning Considerations section of the report.

Havant Borough Council Borough Design Guide SPD December 2011  
Havant Borough Council Parking SPD July 2016  
Chichester Harbour Management Plan 2024-2025 N/A  
Havant Borough Council and Chichester District Council Joint SPD - Chichester Harbour Area of Outstanding Natural Beauty N/A

##### Havant Borough Local Plan (Core Strategy) March 2011

CS1 (Health and Wellbeing)  
CS6 (Regeneration of the Borough)  
CS8 (Community Safety)  
CS9 (Housing)  
CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough)  
CS13 (Green Infrastructure)  
CS14 (Efficient Use of Resources)  
CS15 (Flood and Coastal Erosion)  
CS16 (High Quality Design)  
CS17 (Concentration and Distribution of Development within the Urban Areas)  
CS20 (Transport and Access Strategy)  
CS21 (Developer Requirements)  
DM1 (Recreation and Open Space)  
DM3 (Protection of Existing Employment and Tourism Sites)  
DM8 (Conservation, Protection and Enhancement of Existing Natural Features)  
DM10 (Pollution)  
DM11 (Planning for More Sustainable Travel)  
DM12 (Mitigating the Impacts of Travel)  
DM13 (Car and Cycle Parking on Residential Development)

##### Havant Borough Local Plan (Allocations) July 2014

AL1 (Presumption in Favour of Sustainable Development)  
AL2 (Urban Area Boundaries and Undeveloped Gaps between Settlements)  
LP1 (Leigh Park Housing Allocations (Sites)) Site Reference L145  
DM17 (Contaminated Land)  
DM18 (Protecting New Development from Pollution)  
DM24 (Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development)

Emsworth Neighbourhood Plan Post Examination Version 2020 N/A

Listed Building Grade: N/A

Conservation Area: N/A

## 5. **Statutory and Non Statutory Consultations**

### **Arboriculturalist/Tree Officer**

#### Final Comments

The additional Technical Note appears to be adequate for the site – submitted 27th March 2026 and if followed I would expect the trees to grow on unharmed as part of the application.

If you are minded to permit, please add the following condition:

The development hereby permitted shall only be carried out in accordance with the submitted Technical Note – Mark Wellby – March 2026.

**Reason:** To protect the health of adjacent trees in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

#### Original Comments

The arboricultural information provided by Mark Welby Ltd is to a high standard and provides justification for the removal of the low category trees on site to facilitate development and provides adequate tree protection and methods to ensure (if followed) that the trees highlighted for retention will continue to be sustainable in this location post development.

I raise no objection and suggest the following condition is applied should permission be given:

The development hereby permitted shall only be carried out in accordance with the Arboricultural Impact Appraisal and Preliminary Arboricultural Method Statement (Reference: MMW.2407.SSE.AIA ) and British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations).

Reason: To ensure the continuity of amenity value afforded by the trees in question and in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.

### **Building Control**

#### Final Comments: uploaded 19<sup>th</sup> Feb 26

I refer to your email below and have assessed the information provided

I would confirm that the comments raised in previous consultation (October 2025) have now been resolved by the information provided in your email (19/02/2025)

#### Original Comments: uploaded 2<sup>nd</sup> October 25

Building Control would make the following observations:

1. No drawing showing Fire Authority or Refuse vehicle turning provisions along with max distance to further point of a dwelling (AD B / H)

2. Location of solid bin waste storage not indicated from what I can find (AD H)

3. Foul and surface public sewers run across this site SWS should be consulted (AD H)

### **County Archaeologist**

#### Final Comments:

I am happy to confirm my previous advice of 23 September 2025. I would not raise any archaeological issues.

#### Original Comments uploaded 23<sup>rd</sup> Sept 25

I would draw your attention to the archaeological desk based assessment that has been submitted which I would endorse to you. This report relies on the high degree of damage likely to have been inflicted on the site by the previous development and the likelihood that previous development had a 'widespread negative impact' (para 5.2, 5.5, 6.4 and 6.6). It is concluded that in view of this, and the limited available archaeological evidence in the vicinity, that no archaeological field work in mitigation of the development is required. I would concur.

I am happy to confirm that I would not raise any archaeological issues.

### **Climate Change Coordinator**

#### Further comments 3<sup>rd</sup> February 26

Following a review, please can both of the below pre-commencement conditions be included with any permission given so that the authority can establish the sustainability of the proposal prior to commencement.

- 1) *No development shall commence until a sustainability statement has been submitted to and approved in writing by the Local Planning Authority. The sustainability statement shall detail how the dwellings shall incorporate low carbon and renewable technology. The statement shall detail how the development will follow an energy hierarchy, design out carbon and follow fabric first principles. As a minimum the development shall achieve a reduction in CO2 emissions of at least 31% of the Dwelling Emission Rate (DER) compared to the Target Emission Rate (TER) of Part L of the 2022 Building Regulations. The development shall be carried out in full accordance with the approved details.*

**Reason:** *In the interest of sustainability and having regards to the Council's Climate Change Strategy and Action Plan and policies CS13, CS11 and CS14 of the Havant Borough Core Strategy 2011 and the National Planning Policy Framework. This is a pre-commencement condition as it goes to the heart of the permission*

- 2) *No development shall commence until a sustainability statement has been submitted to and approved in writing by the local planning authority outlining and showing in detail where the Electrical Vehicle Charging points for the development shall installed. The approved Charging Points shall be installed prior to the occupation of the development and retained and maintained at all times thereafter.*

**Reason:** *In the interest of sustainability and having regards to the Council's Climate Change Strategy and Action Plan and policies CS13, CS11 and CS14 of the Havant Borough Core Strategy 2011 and the National Planning Policy Framework. This is a pre-commencement condition as it goes to the heart of the permission.*

#### Original Comments 17<sup>th</sup> December 25

After conducting an assessment of the energy and sustainability statement included with the report, there are numerous statements within it outlining that 'the developer reserves the right to make appropriate changes to the final specification when the scheme reaches detailed design stage.'

This is considered to be the final design stage and it's noted that the layout has changed but the report does not seem to reflect this. Can you please go back to the agent and ask them whether this is the final specification regarding this document.

#### **Development Infrastructure Team (CIL & S106)**

#### Final Comments: Uploaded 8<sup>th</sup> October 25

Updated Comments – HBC Developer Contributions

##### CIL

The dwellings are CIL Liable, in accordance with our CIL Charging Schedule:

<http://www.havant.gov.uk/sites/default/files/documents/HBC%20CIL%20Charging%20Schedule%20Full%20Document%20Feb%202013.pdf>

##### S106

Subject to statutory consultee responses we would expect the S106 to include (amongst any other site-specific obligations necessary):

1. Affordable Housing
2. HBC Monitoring Fees\*
3. HCC Monitoring Fees
4. BNG On/Offsite Monitoring – Mitigation provided as part of BNG will require monitoring and occasionally enforcement over a period of 30 years and appropriate charges to cover the council's costs are sought. The charge is based on the size of the scheme and the highest difficulty of habitat creation.
5. Management Company and Management Plan (may include SUDS)
6. Solent Recreation Mitigation Strategy (see further information)\*\*
7. Nutrient Neutrality\*\*\* - if the applicant is seeking to purchase mitigation from Whitewool Farm. This will require ongoing monitoring. There is a separate charge to monitor third party agreements (see bottom of page).

8. SUDS/SUDS Bond (Bond not necessary if Southern Water have agreed to adopt SUDS once installed)
9. Community Worker – payment due on commencement
10. Potential on site Ecological Mitigation
11. Employment and Skills Plan
12. Education (HCC)
13. Site Specific Transport Improvements (HCC)
14. Highway Works (HCC)
15. Others arising out of consultee responses

**SEE THE HBC DEVELOPER CONTRIBUTIONS GUIDE FOR ADDITIONAL INFORMATION:**

Latest version accessible from: <https://www.havant.gov.uk/community-infrastructure-levy>

**\*HBC Monitoring Fees:** As part of the 'Heads of Terms' it is necessary to include monitoring fees. The amended CIL Regulations effective 1/9/19 regularise the collection of S106 monitoring fees. . Havant Borough Council also monitors and discharges all Hampshire County Council Covenants on behalf of the County and the charges below also apply for each Hampshire County Council Head of Term. We have an agreed schedule of charges:

**From 1 April 2025**

- £973 per non-financial head of term (outside the scope of VAT)
- 5% of cost per Havant Borough Council financial head of term (outside the scope of VAT)

This contribution is indexed in accordance with the CPI.

**\*\*Solent Recreation Mitigation Strategy**

The charges are set out below, based on the maximum number of **net** new dwellings and bedroom sizes; contribution will be indexed (RPI), these rates will be updated 1/4/26: <http://www.havant.gov.uk/unilateral-undertaking-solent-recreation-mitigation-strategy>

| <b>No. of Bedrooms</b> | <b>Amount</b> | <b>Monitoring fee</b>                                           |
|------------------------|---------------|-----------------------------------------------------------------|
| 1                      | £482          | Plus 5% of total (sum may be included in 'HBC Monitoring Fees') |
| 2                      | £696          |                                                                 |
| 3                      | £907          |                                                                 |
| 4                      | £1,067        |                                                                 |
| 5                      | £1,251        |                                                                 |

**\*\*\*Third Party Nutrient Mitigation Schemes**

Havant Borough Council is responsible for ongoing monitoring of Third Party Nutrient Mitigation Schemes. When accepting mitigation from such schemes for example Warnford Park Estate, the Council will need to seek a payment from the applicant to contribute towards these costs.. The amount payable will be 1% of the total overall kilogramme (kg) purchase cost. Where this is calculated to be less than £100, a minimum fee of £100 will be payable. This charge can be collected outside the S106 agreement.

#### Communities Team – General

Due to the size of the development, it is essential to secure Community Project Worker (CPW) contributions through the s106 agreement. A Community Worker or Community Officer can be instrumental in providing essential liaison between the Developer, Council, Councillors and members of the public and will also assist in the integration of the proposed site with the existing community. For Community Workers for sites where there are 20 or more dwellings, the contribution is £345 per dwelling at 1/4/25 (indexed in accordance with the CPI). This flat rate applies to developments of up to 150 dwellings. For sites being delivered on a phased basis, or with more than 150 dwellings this should be regarded as a base figure and will be the subject of negotiation to ensure that the payment covers the duration of delivery of the site. The trigger for payment will be prior to commencement, however for larger sites this payment can be divided into separate instalments, the first payable prior to commencement.

#### **Environment Agency**

No comments received

#### **Ecologist HBC**

##### Final Comments dated 11<sup>th</sup> February 26

The application is accompanied by a Preliminary Ecological Appraisal (John Wenman, December 2025), an Invertebrate Survey (Matthew Smith, July 2025), a Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and a Biodiversity Net Gain Assessment report (John Wenman, December 2025).

The site comprises an extensive area of formerly developed land that now contains a varied mix of dense scrub, tall herbage, open grassland and sparsely vegetated land (open mosaic habitat). The site is classic brownfield land. In terms of the site's potential for supporting protected and notable species, the invertebrate survey recorded a relatively low number of species and few species of conservation concern: it is concluded that the site is not a remarkable example of brownfield habitat for invertebrates. The site does offer some suitable habitat for foraging bats species, although the highly urbanised character of the wider area is likely to reduce suitability overall: however, bat species will be present locally and be likely to occur within the site on occasion. The trees and scrub within and around the site are suitable for supporting various bird species, and it is likely that small numbers of common and widespread 'garden' bird species will breed on site. There is some potential for common reptiles and mammal species such as Hedgehog. Overall, I am content that the potential impacts on protected and notable species have been assessed proportionately. A series of recommendations for impact avoidance and mitigation are provided and these are satisfactory.

The Biodiversity Net Gain assessment has been undertaken correctly. The submitted BNG metric calculations conclude that the proposed development will result in a

habitat unit deficit of -6.97 which equates to -74.17%. The bulk of this deficit comprises medium and high distinctiveness habitats. Based on the submitted site layout, there is limited opportunity for addressing the habitat unit deficit on site – please note comments below on landscaping. The proposed landscaping on site contains relatively limited areas of created semi-natural habitat such as grassland and scrub. The key issue is the loss of the high distinctiveness Open Mosaic Habitat: this is a habitat type which must be compensated on a like-for-like basis. I am not aware of an off-site option for this habitat type within Havant Borough, and there are very limited options elsewhere, especially in southern England. This is an issue common to several development sites within the Borough.

The amended BNG calculations now include off-site measures at Halnaker Farm habitat bank in West Sussex. Habitat units to be purchased include 0.27 pond units, 3.6 mixed scrub units and 6.5 other neutral grassland units (all in moderate condition). The overall BNG gain for on- and off-site measures is 10.04%. Whilst I am content that there are available and deliverable off-site BNG habitats, the fact remains that the BNG trading rules are not being met – a high distinctiveness habitat is being replaced predominantly with lower distinctiveness habitats. It remains possible for the LPA to apply some flexibility to the BNG Metric rules. Rule 4 of the Metric states: ‘In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority’ and should be used ‘where there is a clear ecological justification that a proposal will deliver significant environmental benefits not fully captured by the metric tool’. I am content that the proposed habitat bank units will deliver nature recovery, albeit outside the borough. The LPA will need to see evidence that these units have been allocated to the development.

The above matters aside, I note continued comments from the Council’s Landscape consultee around the unsatisfactory site layout. Further discussion seems necessary to resolve these comments, and this may have an impact on the extent and type of landscaping and the potential for increased opportunities for on-site BNG habitats and ecological enhancements. I will be happy to provide further comment following any required amendments to the overall site layout. Given the substantial BNG unit deficit, it would seem prudent to maximise the potential for on-site BNG, and I don’t really see any issue with a more imaginative landscaping scheme that addresses the loss of OMH. Until such time as the landscaping deficiencies are resolved I must advise that the on-site BNG situation remains provisional. The argument for accepting a Rule 4 circumstance becomes simpler once every opportunity for on-site BNG has been explored and, where justified, rejected. The off-site options are accepted as a good option but require the LPA to be very flexible with the interpretation of Rule 4.

Once the landscaping matters have been resolved, and if you are minded to grant permission, can I suggest that ecological measures are secured by the following conditions:

*Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Preliminary Ecological Appraisal (John Wenman, December 2025), Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and Biodiversity Net Gain Assessment report (John Wenman, December 2025). Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

I would recommend that all BNG requirements are secured through condition.

Recommended condition wording is provided below.

*A Biodiversity Gain Plan shall be prepared in accordance with Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and must include:*

- (1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*
- (2) the pre-development biodiversity value of the on-site habitat;*
- (3) the post-development biodiversity value of the on-site habitat;*
- (4) any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) any biodiversity credits purchased for the development; and*
- (6) any such other matters as the Secretary of State may by regulations specify.*

*The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:*

- (7) a non-technical summary;*
- (8) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (9) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (10) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (11) the monitoring methodology and frequency in respect of the created or enhanced habitat.*

*Notice in writing shall be given to the Council when the:*

- (12) HMMP has been implemented; and*
- (13) habitat creation and enhancement works as set out in the HMMP have been completed.*

*The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

*Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.*

*Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them. Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

Original Comments uploaded 9<sup>th</sup> Oct 25

## Ecologist HBC

### Final Comments dated 11<sup>th</sup> February 26

The application is accompanied by a Preliminary Ecological Appraisal (John Wenman, December 2025), an Invertebrate Survey (Matthew Smith, July 2025), a Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and a Biodiversity Net Gain Assessment report (John Wenman, December 2025).

The site comprises an extensive area of formerly developed land that now contains a varied mix of dense scrub, tall herbage, open grassland and sparsely vegetated land (open mosaic habitat). The site is classic brownfield land. In terms of the site's potential for supporting protected and notable species, the invertebrate survey recorded a relatively low number of species and few species of conservation concern: it is concluded that the site is not a remarkable example of brownfield habitat for invertebrates. The site does offer some suitable habitat for foraging bats species, although the highly urbanised character of the wider area is likely to reduce suitability overall: however, bat species will be present locally and be likely to occur within the site on occasion. The trees and scrub within and around the site are suitable for supporting various bird species, and it is likely that small numbers of common and widespread 'garden' bird species will breed on site. There is some potential for common reptiles and mammal species such as Hedgehog. Overall, I am content that the potential impacts on protected and notable species have been assessed proportionately. A series of recommendations for impact avoidance and mitigation are provided and these are satisfactory.

The Biodiversity Net Gain assessment has been undertaken correctly. The submitted BNG metric calculations conclude that the proposed development will result in a habitat unit deficit of -6.97 which equates to -74.17%. The bulk of this deficit comprises medium and high distinctiveness habitats. Based on the submitted site layout, there is limited opportunity for addressing the habitat unit deficit on site – please note comments below on landscaping. The proposed landscaping on site contains relatively limited areas of created semi-natural habitat such as grassland and scrub. The key issue is the loss of the high distinctiveness Open Mosaic Habitat: this is a habitat type which must be compensated on a like-for-like basis. I am not aware of an off-site option for this habitat type within Havant Borough, and there are very limited options elsewhere, especially in southern England. This is an issue common to several development sites within the Borough.

The amended BNG calculations now include off-site measures at Halnaker Farm habitat bank in West Sussex. Habitat units to be purchased include 0.27 pond units, 3.6 mixed scrub units and 6.5 other neutral grassland units (all in moderate condition). The overall BNG gain for on- and off-site measures is 10.04%. Whilst I am content that there are available and deliverable off-site BNG habitats, the fact remains that the BNG trading rules are not being met – a high distinctiveness habitat is being replaced predominantly with lower distinctiveness habitats. It remains possible for the LPA to apply some flexibility to the BNG Metric rules. Rule 4 of the Metric states: 'In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority' and should be used 'where there is a clear ecological justification that a proposal will deliver significant environmental benefits not fully captured by the metric tool'. I am content that the proposed habitat bank units will deliver nature recovery, albeit outside the borough. The LPA will need to see evidence that these units have been allocated to the development.

The above matters aside, I note continued comments from the Council's Landscape consultee around the unsatisfactory site layout. Further discussion seems necessary to resolve these comments, and this may have an impact on the extent and type of landscaping and the potential for increased opportunities for on-site BNG habitats and ecological enhancements. I will be happy to provide further comment following any required amendments to the overall site layout. Given the substantial BNG unit deficit, it would seem prudent to maximise the potential for on-site BNG, and I don't really see any issue with a more imaginative landscaping scheme that addresses the loss of OMH. Until such time as the landscaping deficiencies are resolved I must advise that the on-site BNG situation remains provisional. The argument for accepting a Rule 4 circumstance becomes simpler once every opportunity for on-site BNG has been explored and, where justified, rejected. The off-site options are accepted as a good option but require the LPA to be very flexible with the interpretation of Rule 4.

Once the landscaping matters have been resolved, and if you are minded to grant permission, can I suggest that ecological measures are secured by the following conditions:

*Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Preliminary Ecological Appraisal (John Wenman, December 2025), Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and Biodiversity Net Gain Assessment report (John Wenman, December 2025). Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

I would recommend that all BNG requirements are secured through condition. Recommended condition wording is provided below.

*A Biodiversity Gain Plan shall be prepared in accordance with Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and must include:*

- (1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*
- (2) the pre-development biodiversity value of the on-site habitat;*
- (3) the post-development biodiversity value of the on-site habitat;*
- (4) any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) any biodiversity credits purchased for the development; and*
- (6) any such other matters as the Secretary of State may by regulations specify.*

*The development shall not commence until a Habitat Management and Monitoring Plan*

*(HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been*

*submitted to, and approved in writing by, the local planning authority. The HMMP shall*

*include:*

- (7) a non-technical summary;*
- (8) the roles and responsibilities of the people or organisation(s) delivering*

*the HMMP;*

*(9) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*

*(10) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*

*(11) the monitoring methodology and frequency in respect of the created or enhanced habitat.*

*Notice in writing shall be given to the Council when the:*

*(12) HMMP has been implemented; and*

*(13) habitat creation and enhancement works as set out in the HMMP have been completed.*

*The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports*

*shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

*Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.*

*Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them. Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

#### Original Comments uploaded 9<sup>th</sup> Oct 25

The application is accompanied by a Preliminary Ecological Appraisal (John Wenman, July 2025), an Invertebrate Survey (Matthew Smith, July 2025), a Biodiversity Net Gain Statutory Metric (John Wenman, July 2025) and a Biodiversity Net Gain Assessment report (John Wenman, July 2025).

The site comprises an extensive area of formerly developed land that now contains a varied mix of dense scrub, tall herbage, open grassland and sparsely vegetated land (open mosaic habitat). The site is classic brownfield land. In terms of the site's potential for supporting protected and notable species, the invertebrate survey recorded a relatively low number of species and few species of conservation concern: it is concluded that the site is not a remarkable example of brownfield habitat for invertebrates. The site does offer some suitable habitat for foraging bats species, although the highly urbanised character of the wider area is likely to reduce suitability overall: however, bat species will be present locally and be likely to occur within the site on occasion. The trees and scrub within and around the site are suitable for supporting various bird species, and it is likely that small numbers of common and widespread 'garden' bird species will breed on site. There is some potential for common reptiles and mammal species such as Hedgehog. Overall, I am content that the potential impacts on protected and notable species have been assessed proportionately. A series of recommendations for impact avoidance and mitigation are provided and these are satisfactory.

The Biodiversity Net Gain assessment has been undertaken correctly. The submitted BNG metric calculations conclude that the proposed development will result in a habitat unit deficit of 8.25 which equates to -77.75%. The bulk of this deficit comprises medium and high distinctiveness habitats. Based on the submitted site layout, there is limited opportunity for addressing the habitat unit deficit on site. The proposed landscaping on site contains relatively limited areas of created semi-natural habitat such as grassland and scrub. The key issue is the loss of the high distinctiveness Open Mosaic Habitat: this is a habitat type which must be compensated on a like-for-like basis. I am not aware of an off-site option for this habitat type within Havant Borough, and there are very limited options elsewhere, especially in southern England. This is an issue common to several development sites within the Borough. Within the BNG process there is a degree of flexibility for Local Planning Authorities in agreeing compensatory habitats, and I would be willing to discuss potential alternatives to the strict definition of Open Mosaic Habitat but which are able to provide the same function as habitat.

I note comments from the Council's Landscape consultee around the unsatisfactory site layout. Further discussion seems necessary to resolve these comments, and this may have an impact on the extent and type of landscaping and the potential for increased opportunities for BNG habitats and ecological enhancements. I will be happy to provide further comment following any required amendments to the overall site layout. Given the substantial BNG unit deficit, it would seem prudent to maximise the potential for on-site BNG.

The above comments aside, if you are minded to grant permission, can I suggest that ecological measures are secured by the following conditions:

*Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025), Biodiversity Net Gain Statutory Metric (John Wenman, July 2025) and Biodiversity Net Gain Assessment report (John Wenman, July 2025). Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

*I would recommend that all BNG requirements are secured through condition. Recommended condition wording is provided below.*

*A Biodiversity Gain Plan shall be prepared in accordance with Biodiversity Net Gain Statutory Metric (John Wenman, July 2025) and must include:*

- (1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*
- (2) the pre-development biodiversity value of the on-site habitat;*
- (3) the post-development biodiversity value of the on-site habitat;*
- (4) any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) any biodiversity credits purchased for the development; and*

*(6) any such other matters as the Secretary of State may by regulations specify.*

*The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:*

*(7) a non-technical summary;*

*(8) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*

*(9) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*

*(10) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*

*(11) the monitoring methodology and frequency in respect of the created or enhanced habitat.*

*Notice in writing shall be given to the Council when the:*

*(12) HMMP has been implemented; and*

*(13) habitat creation and enhancement works as set out in the HMMP have been completed.*

*The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

**Reason:** *To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.*

*Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them. Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

## **Economic Development**

No comments received

**County Education Department**

### Final Comments:

We have reviewed the documents and have no further comments to add.

### Original Comments: 18<sup>th</sup> September 25

The proposed development of 79 eligible dwellings would usually be expected to generate a total of 24 additional primary age children and 17 additional secondary age pupils. This is based on a rounded figure of 0.3 primary age children per new dwelling and 0.21 secondary age children per dwelling which was derived by conducting demographic surveys of developments that have been completed within Hampshire and calculating the average number of primary age children on those developments.

The Development site is served by Sharps Copse Primary and Nursery School and Havant Academy. Sharps Copse Primary and Nursery School is forecast to have capacity.

Havant Academy is forecast to have capacity. I would not be seeking a contribution at this time towards primary or secondary provision. If you have any queries concerning the above, or wish to discuss this matter, please do not hesitate to contact me via email at: [strategicplanningunit@hants.gov.uk](mailto:strategicplanningunit@hants.gov.uk).

### **Natural England**

#### Final Comments 24<sup>th</sup> April 2026

Just to confirm you **do not** need to consider phosphorous for Havant Borough, this was a mistake in my letter and should only refer to Nitrogen mitigation.

#### Further Comments 6<sup>th</sup> March 2026

#### SUMMARY OF NATURAL ENGLAND'S ADVICE

#### NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

Natural England considers that without appropriate mitigation the application would have an adverse effect on the integrity of European designated sites.

Your authority has measures in place to manage potential impacts through contributions to an agreed strategic solution(s) which we consider to be ecologically sound. Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing harmful effects on the Habitats Site(s) for the duration of the proposed development. Mitigation measure(s) to offset any positive nutrient budget should be provided within the relevant catchment area(s).

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered, and relevant local bodies are consulted.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

#### Further Advice

Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process. The advice within this letter should be taken as Natural England's formal representation on appropriate assessment given under regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 (as amended).

With regard to European Sites, Natural England does not object to the granting of this permission subject to the advice given below.

This application may lead to an increase in residential accommodation. Natural England is aware that your authority has adopted planning policy to mitigate against adverse effects from recreational disturbance. Provided that the applicant is complying with the policy and the Bird Aware Definitive Strategy, Natural England are satisfied that the Applicant has mitigated against the potential adverse effects of the development on the integrity of the European site(s) and has no objection to this aspect of the application. Please note, your authority's appropriate assessment should reflect the current developer contribution rates, which are updated every April in line with the Retail Price Index.

Your appropriate assessment dated 16 February 2026, concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the European sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given.

This advice is provided on the basis that all mitigation measures will be secured as planning conditions or obligations by your authority to ensure their strict and timely implementation for the full duration of the development. Your authority should be assured that proposed financial contribution rates are proportionate to the identified effects of the proposed development, suitably precautionary, and in line with the Retail Price Index, where relevant.

#### Deterioration of the water environment - Nutrient Neutrality

As Competent Authority it is your responsibility to ensure that you are confident that there is sufficient information to support the values used in any nutrient budget calculation that supports this application, and that any nutrient budget calculation(s) are correct.

#### Bespoke Occupancy

Where any bespoke occupancy value has been used within the calculator tool, it is Natural England's view that competent authorities may choose to adopt bespoke calculations for detailed planning applications, if sound robust evidence is available.

These are matters for each competent authority. Natural England's advice is to take a precautionary approach that recognises any uncertainty.

#### Package Treatment Plant

Please note that for any budget that includes use of an onsite Package Treatment Plant (PTP), yourselves as competent authority should be satisfied that any bespoke effluent discharge figure has been suitably evidenced. This could be through using a performance test certificate, via adequate robust real-world monitoring data (minimum 12 months representing typical operation), or if these are not available then through use of the precautionary default figure within the nutrients budget calculator. The planning application should be supported by a PTP monitoring and maintenance plan. Please refer to the Environment Agency for comments on wider environmental consideration associated with PTPs and any advice in relation to permits.

#### Sustainable Drainage System

Where calculations include removal of nutrients through on-site Sustainable Drainage Systems (SuDS) it is essential for your authority to verify that the necessary supporting evidence has been submitted, as that forms the basis for the SuDS calculations. As highlighted in the guidance that accompanies the calculators on Gov.uk, Natural England advises that SuDS calculations should be undertaken in accordance with CIRIA guidance (C808 – Using SuDS to reduce phosphorus in surface water runoff (2022) and/or C815 – Using SuDS to reduce nitrogen in surface water runoff (2023)).

In addition, the SuDS features require monitoring and management in perpetuity. Your authority must ensure that a robust ongoing management plan is appropriately secured and is enforceable in any planning permission given.

#### Grampian Conditions - Nutrient Neutrality

Natural England is aware that your authority has adopted an interim strategy using Grampian conditions to address nutrient impacts from developments currently in the planning system and we have been working with the Council to develop this approach. It is noted that the mitigation would be secured through a Grampian condition, requiring the mitigation package to be agreed, provided to the Council and implemented prior to the occupation of the development.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. With regard to deterioration of the water environment, it is noted that the approach to address the positive nitrogen budget for this development is to offset against the interim strategy, with measures to ensure this approach can be adequately secured and accounted for.

We recommend for completeness that the HRA explicitly state that mitigation for phosphorus, as well as nitrogen, will be secured, (**Officer Comment: Please see later comment clarifying that phosphorus mitigation is not needed in this case**) and that the development will therefore be nutrient neutral.

Comments date 25<sup>th</sup> September 25

SUMMARY OF NATURAL ENGLAND'S ADVICE

## FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

The proposed development has the potential to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin. Natural England's statutory advice on these potential impacts is set out below.

### Designated sites

#### Further information required – recreational pressure impacts to Solent SPAs

This development site is within the zone of influence (Zol) for recreational pressure impacts to the Solent SPAs.

Within this Zol, proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the Solent SPAs through increased recreational pressure when considered either alone or in combination with other plans and projects.

Your authority has measures in place to manage these potential impacts through a strategic solution which Natural England considers will be effective in preventing adverse impacts on the integrity of the site(s).

Notwithstanding this, Natural England advises that these measures should be formally checked and confirmed by your authority, as the competent authority, via an appropriate assessment in view of the Natural England Access to Evidence – Conservation Objectives for European Sites and in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).

Providing the appropriate assessment concludes that the measures can be secured, it is likely that Natural England will be satisfied that there will be no adverse effect on the integrity of the Solent SPAs in relation to recreational disturbance.

Where the proposal includes bespoke mitigation that falls outside of the strategic solution, Natural England should be consulted.

Reserved Matters applications, and in some cases the discharge/removal/variation of conditions, where the permission was granted prior to the introduction of the strategic approach, should also be subject to the requirements of the Conservation of Habitats & Species Regulations 2017 (as amended) and our advice above applies.

#### Further information required – potential water quality/nutrient impacts to European Sites (habitats sites)

This development site is within the catchment of a European Site (habitats site) vulnerable to nutrient impacts.

Within this location, proposals with the potential to affect water quality may have a likely significant effect on the qualifying features of the European Site (habitats site) through adverse nutrient impacts.

Natural England advises that such developments require a Habitats Regulations Assessment (HRA), which has been informed by nutrient budget calculations (Using the nutrient neutrality calculators – GOV.UK ([www.gov.uk](http://www.gov.uk)) or local calculator if preferred), to consider the impacts, alone and in combination with other plans/projects, proceeding to appropriate assessment stage where likely significant effects cannot be ruled out.

The HRA should take into consideration the Natural England Access to Evidence - Conservation Objectives for European Sites and it will need to set out in detail any mitigation measures that will be secured in this case, along with the necessary justification of their likely efficacy to ensure there is no adverse effect on the integrity of the site in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

Natural England must be consulted on any proposals which reach the appropriate assessment stage of HRA. With the consultation, please include a nutrient mitigation strategy including information on the management and monitoring of the proposed mitigation measures along with details of how they will be secured and funded in perpetuity.

Please refer to Strategic Solutions: Nutrient Neutrality ([naturalengland.org.uk](http://naturalengland.org.uk)) for further information.

Please be aware that if the information is not supplied, Natural England may need to consider objecting to the proposal based on potential harm to the habitats site(s).

#### Discretionary Advice

Natural England may provide further advice to the applicant through the discretionary advice service (DAS). Refer to Developers: get environmental advice on your planning proposals – GOV.UK ([www.gov.uk](http://www.gov.uk)) for more information.

#### Impact Risk Zones for Sites of Special Scientific Interest

We strongly recommend that local planning authorities (LPAs) use Natural England's Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) (available from the Natural England Open Data Geoportal ([arcgis.com](http://arcgis.com)) and to use on MAGIC ([defra.gov.uk](http://defra.gov.uk)) along with guidance) to decide when to consult Natural England on development proposals that might affect a SSSI.

The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances. Use of the SSSI IRZs avoids the need for a formal email consultation on some development proposals, reducing unnecessary delays in the planning process. In turn this allows Natural England to concentrate resources on development proposals with the highest risks and opportunities for nature recovery.

Planning and transport authorities: get environmental advice on planning – GOV.UK ([www.gov.uk](http://www.gov.uk)) provides further guidance on when LPAs must consult Natural England on development proposals.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

## County Highways

### Final Comments 23<sup>rd</sup> April 2026

Thank you for the re-consultation for the above application. The Highway Authority previously provided a response dating 4th March 2026 requesting additional information. A series of meetings and ongoing conversation between the Highway Authority and the applicant have taken place to resolve the remainder of the outstanding issues. Following this, a revised set of drawings and information has been submitted for review. Upon review the following comments are made.

#### Sustainable Access:

##### *Walking and Cycling:*

Revised plans for the proposed shared use path along Bartons Road, connecting the existing provisions at Petersfield Road and Martins Road, along with an arboriculturist report has been provided. The arboriculturist report and revised annotated plans suitably address the Highway Authority's previous concerns. The proposed shared use works are therefore considered acceptable in principle. It is advised to the applicant (and as previously mentioned) a DfS (Departure from Standards) during the S278 detail design stage for the shared use path surrounding the bus stop where this narrows to 2.75m would be required. The shared use path along the Bartons Road as shown in principle on drawing 24-097/017 Rev C and 24-097/016 Rev E should be secured in any future S106 agreement to be delivered by the applicant via a S278 agreement.

##### *WCHAR:*

The Highway Authority previously requested a revised WCHAR should be undertaken which included a Healthy Street review. However, upon further reflection, the submitted WCHAR was submitted before the Highway Authority TG19 guidance was updated, and therefore it is concluded that a revised WCHAR containing a healthy street assessment of the route is no longer required. The walking and cycling audit undertaken to date is therefore considered acceptable.

##### *Martins Road Link:*

Following on from discussion the link southwards from the site to Martins Road, to facilitate the connection to the Bus stop, has now been widened to 3m to enable cycle connections to Martins Road and onwards to the existing street network. This is acceptable to the Highway Authority. These works, which include the 3m shared use connection from the site to Martins Road (noting it crosses 3rd party Land belonging to Portsmouth City council) as shown in principle on drawing 1110 Rev I, and improvements to the bus stop which include a bus shelter, seating area and bus cage road markings, should be secured in any future S106 agreement to be delivered by the applicant via S278 agreement. Portsmouth City Council may be required to be partied to the S106 to facilitate these works.

##### *Site Access:*

Additional tracking in line with what was previously submitted under application App/20/00658, has been provided, which demonstrates refuse tracking for the site

access along with additional tracking for Knightswood. The site access is considered acceptable in principle to the Highway Authority. The site access works as shown on drawing 24-097/016 Rev E should be secured in any future S106 agreement to be delivered by the applicant via a S278 agreement. It is advised that the applicant notes the previous comments regarding the requirements for a DfS during S278 detail design for the Stagger Distances and right turn lane taper.

#### *Football Access:*

The submitted drawings have been updated to show this access as a 3m wide vehicle cross over, with associated visibility splays provided. This is now acceptable to the Highway Authority. It is advised to Havant Borough Council that agreement from the landowner is required for this access to be relocated. Additionally, consideration to the landowner being partied to the S106 may also be required.

#### Internal Site Layout:

Following on from the Highway Authority previous comments and subsequent meetings to discuss the internal site layout, a revised layout and associated tracking drawings have been provided that addresses all previous concerns. For the majority of the internal layout, a 5.5m carriageway with a 2m footway has been provided, with this narrowing down to shared space environment of 5m. Tracking has been provided which demonstrates two-way vehicular movement throughout the majority of the site is possible. This is therefore acceptable to the Highway Authority.

#### Adoption:

Drawing 24-097/015 Rev D, has been updated following on from the revision to the internal site layout. This now shows the areas that are to remain in private ownership, transferred to a management company, and offered to HCC for adoption. Whilst the Highway Authority are satisfied that adoption plan incorporates the majority of all the necessary visibility splays, the finer details of the extent of the adoption will need to be agreed through the S38 process.

#### Levels and Drainage:

It is recommended that the final levels and drainage details will be secured through an appropriate planning condition to be agreed prior to commencement.

#### Traffic Generation:

##### *Trips:*

The Highway Authority previously requested that the overall trip rate and trips generated by the proposed development should be updated to reflect all private dwellings if no restriction on the breakdown of quantum being proposed. The applicant has since confirmed that no less than 50% of affordable housing will be secured within the S106 agreement. The Highway Authority would prefer a robust assessment to be provided, calculating the total vehicular trip rate based on all private dwellings. However, undertaking our own review whilst there is a small difference in the predicted trips, this would not result in a material difference to the capacity of the highway in the surrounding areas and therefore is acceptable in this instance.

#### *Junction Assessment:*

The Highway Authority previously raised concerns to the design and modelling of the proposed sparrow crossing at the Petersfield Road/ Barton Road Signals. Conversation have therefore taken place, with additional modelling submitted for review. Upon review of the submitted modelling, it should be noted that have HCC made a small adjustment to the staging/operation of the junction, providing an intergreen stage between phase G ending and phase E starting. Phase A has been changed to run throughout stage 4 (phase G). The results indicate that with stage 4 (ped/cycle crossing) being demanded every other cycle, the junction would operate within capacity. Should stage 4 typically be demanded every cycle the junction would be marginally over capacity in the AM peak but substantially over capacity in the PM peak. On the basis that the staging is considered to be a safer arrangement than previously proposed, the slightly reduced capacity at this junction is considered acceptable in this instance.

As a note to the applicant, the provision of a continuous segregated cycle route to meet the cycle phase across Bartons Road is considered an important element of the proposal. As the scheme moves into detailed design, some design changes to the cycle/footway landing area on the north side should be expected. Furthermore, it should be noted that the design for the signal junction contains fundamental differences from that reviewed as part of the Stage 1 RSA but in light of progressing the scheme it is accepted that this can be deferred to the detailed design stage and Stage 2 RSA.

At this time the proposed sparrow crossing is therefore acceptable to the Highway Authority. The sparrow crossing and associated works as shown in principle on drawing 24-097/016 Rev E should be secured in any future S106 agreement to be delivered by the application via a S278 agreement.

#### Travel Plan:

Due to the application seeking permission for 90 dwellings, this falls below the Highway Authority guidance for the requirements of a Travel Plan, and therefore a Travel plan is not required in this instance.

#### Recommendations:

The Highway Authority are satisfied that sufficient information at this time has been provided and therefore have no objections to the above application, subject to the below conditions and obligations. It should be noted by the Planning Authority that both the Martins Road link and football club access amendments are reliant on 3rd party landowners and at the S106 drafting stage due consideration needs to be given to the need to bind these owners within the agreement.

#### *Obligations:*

The following works should be secured for delivery by the applicant in the S106 agreement.

- Site access works on Bartons Road as shown in principle on drawing 24 097/016 Rev E
- Sparrow Crossing and associated works as shown in principle on drawing 24-097/016 Rev E
- Shared use path along Bartons Road from the junction of Petersfield Road/ Bartons Road connecting to the existing at Marting Road, as shown in principle on drawing 24-097/016 Rev E and 24-097/017 Rev C

- A Shared use pedestrian and cycle link from the south of the development to Martins Road, and additional improvements to the Bus stop which include a bus shelter, seating area and bus cage road markings as shown on principle on drawing 1110 Rev I.

*Conditions:*

1. Prior to the first occupation of the development, a site management plan will be submitted to and approved in writing by the local planning authority that identifies any areas within the site that will form part of any highway adoption, controlled by a site management company or transferred as part of plots for private ownership. The approved plan shall thereafter be implemented, unless otherwise agreed in writing by the local planning authority.

2. Prior to the commencement of the development details of the following items must be agreed in writing with the Highway Authority:

- A. Street Lighting Design
- B. Drainage Strategy
- C. Final ground levels plan
- D. Final materials plan

The above matters should be implemented in accordance with the approved plans and be implemented prior to the occupation of any dwellings of which are reliant on such part of the network for access.

Informative:

**S278:**

The applicant should be aware that as the proposals include the formation of a new or altered access onto the highway, which will include works within the highway, these works will be required to be undertaken in accordance with standards laid down by, and under a Section 278 license agreement with, be submitted can the Highway Authority. Full details of how to apply and the required documents to be found via the link: <https://www.hants.gov.uk/transport/developers/section-278>.

The granting of planning permission is independent of the license application, and it is strongly recommended the applicant understands the criteria to be met in order for a license to be granted.

**S38:**

As the proposed internal road network and primary street is to be offered for adoption, the applicant should enter into the S38 process with the Highway Authority at the earliest opportunity to finalise the detailed design matters associated with condition 1 to ensure that the proposed development and detailed design is agreed and constructed in accordance with adoptable design standards prior to first occupation.

Further Comments 4<sup>th</sup> March 2026

Thank you for the re-consultation for the above application. The Highway Authority previously provided a response dating 28th October 2025 requesting additional information. It was also advised to the applicant, that any future submission the package of improvement works and site access arrangement, as secured under application APP/20/00658, was brought forward and also considered as part of any future submission, given the access requirements for the site had been subject to a

significant amount of design considerations as part of that application, with regards establishing a safe and suitable means of access. The applicant has submitted a revised Transport Assessment Addendum (reference 24-097-006 Rev A, dated December 2025) for review, seeking to address the Highway Authority previous comments.

### **Sustainable Access:**

#### **Walking and Cycling:**

Following on from the Highway Authority previous comments, the applicant has now included the proposed improvement works as secured under application APP/20/00658, which includes a sparrow crossing at the junction of Bartons Road and Petersfield Road, and a shared use provision from this junction to Martins Road. Whilst it is noted that the proposals have been previously agreed and are therefore acceptable in principle at this stage, it should be noted to the applicant that additional detailed design considerations will be required during S278 process.

During S278 detail design, a DfS (departure from standards) will be required on the shared use path (east out of the site access) where this narrows down to 2.75m around the bus stop. The Safety Audit Report (RSA) contains a variation of the proposed works and this drawing within the RSA shows an updated drawing where there is also a 2m section of shared use to avoid a lighting column. However, this is not acceptable, and the lighting column should be relocated with a consistent shared use path of 3m provided without obstruction. It is considered that these issues are matters which can be resolved through the s278 process.

A Stage 1 RSA has been undertaken for the proposed off-site works, which raised several safety concerns with the proposal. Whilst the majority can be addressed during detail design, the Highway Authority make the following comments, which should be resolved now at this stage:

- 3.1 – Risk of tree falling into the highway. Whilst the applicant notes that this is an issue for detail design and will be addressed by an Arboriculturist, the Highway Authority are concerned that if this is left to detailed design it may create buildability issues and therefore hinder the deliverability of the shared use path within the Root protection zone. This should therefore be addressed during the planning stage.
- 3.4 - Risk of cycle/vehicle collisions as the junction intervisibility zone is compromised by the development site boundary fence. The applicant's response of "The fence at the north-west corner of the site will be removed or height will be limited to a maximum of 600 mm, ensuring adequate intervisibility between cyclists and vehicles during all signal stages and intergreen periods" is noted and addresses the issue, but plans should be updated to reflect the agreed action. It should be noted that the Highway Authority will request the area of invisibility be dedicated to the Highway Authority and therefore this should be shown and noted on the drawing
- As a note to the applicant, in regard to problem 3.2 (Risk of injury to cyclists using the shared cycle path due to overhanging vegetation )and 3.8 (Low branches from the existing mature tree are likely to obstruct the shared cycle/footway) within the RSA, the response is noted for ongoing maintenance but if this is an issue now, it should be an action to be addressed during detailed design in the first instance.

A revised WCHAR has been undertaken following on from the Highway Authority previous comments which provides a narrative on the routes to several facilities within

the vicinity of the site. However, it does not include a healthy streets review in accordance with HCC TG19 guidance and therefore the WCHAR should be updated to include this. The WCHAR does however suggest improvements to the existing infrastructure which are to be provided (as mentioned above). The extent of the Healthy Streets Audit should be for the extent of the proposed S278 works and from/including the southern access along Martins Road to Petersfield Road.

#### Busses:

As previously stated, reference was made to the closest bus stop being 150m from the site with this being dependent on a link being created to the highway from the south of the site. Clarity has been provided from the applicant that the strip of land between the application site and the highway belongs to Portsmouth City Council, and ongoing conversation are taking place. In any case, a link from the site to the existing footpath here has been shown on the submitted site plan. Whilst this is acceptable it is noted this link through the site is narrow (noting no formal dimensions have been indicated on submitted plans and therefore should be confirmed) and located next to a Bin collection point, and additional consideration should be given to widening this link to at least 3m wide and relocating the bin collection point. As previously stated, with this link being provided, the improvements to the existing bus stop (bus shelter and seating area as well as bus cage road markings) are welcomed and should be secured within any S106 agreement.

#### Site Access:

The site access has been revised following on from the Highway Authority previous comments, which now reflects the site access drawing as secured previously under application APP/20/00658. These proposals include a ghost island right turn lane from Bartons Road into the site and Knightswood Avenue opposite. Junction visibility splays in accordance with posted speed limits of 30mph have been shown, with an additional eastern splay of 2.4m x 49m in accordance with the previously approved junction visibility splay for application App/20/00658 also shown. The football club access has subsequently been relocated further south (into the site), and it is understood that the location of this has been access agreed with the football club.

It is noted that the site access proposals reflect those in which the Highway Authority previously had no principal objection to, and therefore these proposals are also acceptable, however it should be noted that the following information should be provided and considered during detail design.

- The stagger distance to the Knightswood Avenue is noted as 36.79m on the drawings. The stagger does fall short of the required standard of 45m and therefore will require a departure from standard at the detailed design stage. It has however been previously duly considered and determined to be acceptable in principle.
- Not all tapers for the right turn lane comply with CD123 requirements. This will require a DfS at detailed design, but as this is the same as the previously agreed scheme this DfS is likely to be agreed.
- Clarification should be provided in terms of the refuge island crossing and its intended use. Given there is no shared use present on the northern side of Bartons Road, it is assuming this is just for pedestrians. As such Corduroy paving should added on the southern side of Bartons Road in the vicinity of this crossing point.

- As seen visibility splay are currently based on the posted speed limit. In detail design, these should be based on the 85th percentile of measured speeds in accordance with HCC TG3 guidance. It is noted that an additional eastern visibility splay of 2.4m x 49m in accordance with the visibility splays for the previous approved junction arrangement is shown.

#### Tracking:

Tracking of the access has not been provided separately but has been included as part of the documents submitted within the RSA. Upon review, there is concern regarding the refuge tracking, noting this both over hangs the footway when entering the site, and when exiting the tracking does not adopt a suitable lane/waiting position and overhangs the footway. Similarly, the right in movement for a delivery van also overhangs the footway. This did not occur within the previously approved layout; it is unclear why this is the case here. Revised tracking, in accordance with HCC TG2 guidance (noting vehicular dimensions and speed requirements) should therefore be undertaken.

Additionally, due to the proposals including a right turn lane for Knightswood Avenue, tracking for this junction should also be provided.

#### RSA:

A stage 1 RSA has been undertaken for the site access. Whilst the majority of safety issues have been addressed at this stage, there are still concerns with regards to problem 3.6 – large vehicles encroaching opposing lanes. As above, the Highway Authority have concerns with the submitted tracking provided, noting that some movements are tracked poorly starting in the middle of the carriageway, and therefore revised tracking should be provided to ensure all large vehicles can manoeuvre the junction.

#### Football Access:

As stated above, the football access has now been relocated further south, with the football club agreeing to this (noted that the Highway Authority is awaiting written confirmation from the football club in this regards). Whilst it is stated that this access will be in the form of a vehicular crossover, the submitted drawings show this as a bellmouth, and therefore clarity is required. To note, a vehicle crossover access form would be acceptable. Subsequently, no visibility splays for this proposed access have been provided and this is required.

#### Internal Site Layout:

A revised internal site layout has been submitted, following on from the Highway Authority previous comments. This now incorporates a main spine road running north-south with a tertiary road coming off this mid-way. Upon review, the Highway Authority would like to make the following comments.

It is currently not clear if the internal site layout will be offered up for Adoption to the Highway Authority. If so, the applicant should provide a drawing showing the extent of the adoption plan which should also show all visibility splays within these being included within the extent of adoption. If to remain private it would be advisable that the applicant ensures that the roads and footways are designed to minimum industry standards and / or Hampshire County Council's best practice as set out in <https://www.hants.gov.uk/transport/developers/constructionstandards>, and that an

appropriate Private Management Plan is put in place to deal with any future maintenance.

#### General comments:

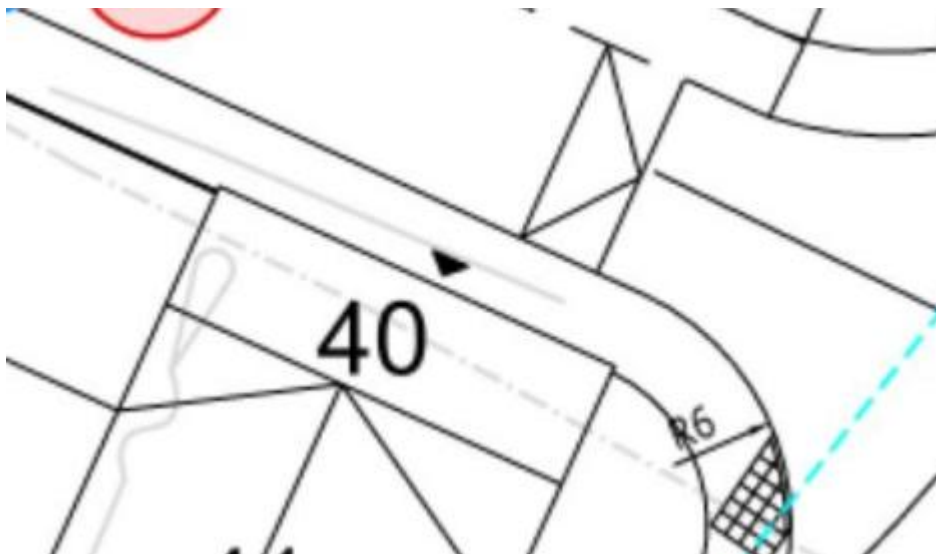
Upon review of the internal site layout plan, whilst a shared use path has been provided along the main spine road, a visitor space on the opposite side of the road to plot 8, slightly overhangs (top left of the space) the shared use path, which is not acceptable. Furthermore, there are several other visitor bays that are missing a hardstanding area for accessing the vehicle, and therefore a hardstanding to the rear of the visitor spaces should be provided. Additional crossing points where appropriate should also be provided in the vicinity of the visitor bays to allow pedestrians to safely cross.

The location of the parking space for plot no.1 on the spine road should be provided and confirmed, as in accordance with HCC TG2 guidance driveways shall not be within 10m of a proposed priority junction.

There are concerns throughout the site regarding dwelling plots having frontages directly onto roads. Any elevation features like porches or canopies are not acceptable to over sail the highway and this detail must be considered to prevent issues with building control compliance. It is therefore recommended that the frontages of plots are updated to provide a suitable landing depth and footways.

Along the frontage of plots 36-39 no footway provision has been provided. Due to the quantum of development accessing of this road, the Highway Authority would require a footway to be provided outside of these plots. In addition, outside of plots 33-29 there is no "landing" area between the dwellings and 2m footway, with the frontages of the dwelling exiting straight out onto the footway, and therefore as above any elevation feature are not sufficiently set back and would obstruct the footway.

The block plan shows that for several plot numbers the building line encroaches on the 2.0m footway width (for reference plot 40 is shown below but this is also present in other areas). If this is the roof line of the proposed dwelling the building lines should also be shown for clarity. The Highway Authority request that this is reviewed to ensure a minimum footway widths can be achieved throughout the site.



In terms of the proposed parking spaces throughout the site, there are several parking bays (21-25) that are perpendicular to a raised table ramp which is not acceptable. Additionally, there are bays that back onto each other such as bays 99 and 101, but due to the design of the spaces and isle widths this could lead to conflict. Generally, the location of all parking bays should be reviewed as several are also located blocking paths/access to dwellings

It is advised to the applicant that the street hierarchy throughout the site should be reviewed with a constant street hierarchy and dimensions provided. Currently, the dimensions indicate that the main road starts of as 5.5m, then narrows down to 5.0m then widens back up to 5.5m for the northwestern section towards the larger blocks of flats. Consistency between the road widths is required.

Lastly, the location of the bin collection points (BCP) should be reviewed, as these are impeding/blocking access for dwellings (outside of plot 55). Specifically, as mentioned above, the BCP at the southern pedestrian/cycle access should be relocated so a wider, more attractive pedestrian/cycle access to Martins Road can be provided.

#### Visibility splays:

Whilst Visibility splays for the internal layout have been provided, there are several concerns with these. As noted within the Transport addendum, only a visibility splay based on a 10mph design speed can be provided at the junction outside of plot 35/36, with the applicant providing two options to address the shortfall in visibility splays;

- Option 1 – provide a Raised table to reduce vehicle speeds
- Option 2- Shift the row of terraces dwelling southwards.

Upon review, the Highway Authority would require option 2, with the layout redesigned to provide visibility splays in accordance with the required design speeds.

Furthermore, all 2m x 2m visibility splays for driveways need reviewing. As currently drawn, many of these are currently blocked by plots or landscaping features and therefore this is not acceptable. As a note to the applicant HCC TG3 states these are to be taken from the centre of the driveway which should address a lot of the issues as they are currently shown.

#### Tracking:

Tracking for a range of vehicular movement throughout the internal site layout has been provided. There are several areas where a refuse overhangs footways/hardstanding areas and this should be revised.

Subsequently, whilst HCC TG2 3.2.8 states a refuse vehicle is to be tracked 'separately', due to the current layout with sweeping bends and no passing places on the internal spine road, it is requested that additional tracking is provided, evidencing where a refuse vehicle and a car can pass.

Additionally, a car passing a small panel van throughout the development should be provided for review, along with tracking of the football club entrance.

It is advised to the applicant that tracking should be in accordance with HCC TG2 guidance noting both vehicle dimensions and tracking speeds.

#### RSA:

Whilst the applicant states that an RSA has been undertaken for the internal site layout plan, with RSA documents submitted only included a “block plan” of the internal site layout. The Highway Authority do not consider the safety auditor to have fully reviewed the internal site layout and therefore a revised RSA for the internal site layout should be undertaken. To note, drawings which include dimension, visibility splays and tracking of the internal site layout should be provided to the RSA safety auditor for assessment along with the block plan of the site.

### **Parking:**

Parking should be assessed by Havant Borough Council as the Local Planning Authority to ensure the proposed level of parking falls in line with their adopted standards. As seen the proposals look at providing a total of 176 spaces (147 resident spaces and 30 visitor spaces), which is understood to be in accordance with these standards.

### **Traffic Generation:**

#### Trips:

Following on from the Highway Authority previous comments, a revised trip assessment has been undertaken. The parameters selected for private residential dwellings now included surveys undertaken on Monday and Fridays, whilst removing any surveys impacted by COVID-19 and surveys location in Scotland. Whilst the resultant trip rate is slightly lower than anticipated by the Highway Authority, this makes a marginal small difference to the trips generated and therefore is accepted in this instance. However, as previously stated unless applicant is willing to accept planning restrictions on the level and type of affordable housing, for a robust assessment, the private trip rate should be used across the entire site, to forecast the total proposed trip generation of the site. The overall trip rate and trips generated by the proposed development should therefore be updated to reflect all private dwellings if no restriction on the quantum of private/affordable is being enforced.

#### Traffic Distribution and Assignment:

The method of travel to work data from the 2011 census has been used to establish the distribution of the traffic generated from the site, with google maps assigning these trips on to the network. This approach is therefore acceptable to the Highway Authority.

#### Committed development trips:

Following on from the Highway Authority previous concerns, committed development flows have been updated, this is now acceptable.

#### Junction Assessment:

Following on from the Highway Authority previous response, a series of revised modelling has been undertaken for the following junctions:

- Site Access
- Petersfield Road/Bartons Road Signals

As shown, the site access will operate within capacity and therefore this is acceptable.

Upon review of the Petersfield Road/Bartons Road Signals, whilst the concept of the Sparrow crossing on the Bartons Road arm is acceptable in principle, the design of the junction needs refinement before the modelling can be fully reviewed. The following comments are therefore made regarding the design on the junction.

As currently submitted, the proposed modelling does not match the proposed junction arrangement. Whilst it is noted that the proposed junction design is similar to that previous submitted under application APP/20/00658 there are still concerns with the current submitted scheme and modelling. The modelling should be updated to allow for a singular stage crossing of the sparrow crossing across Bartons Road.

However, to allow for this continuation of ped/cycle movements this causes a knock-on effect to the existing lane arrangements for the southbound left turn on Petersfield Road, which as existing has a very short flare lane for left turners, which can only hold about two vehicles. To improve the stacking/holding lane for left turn vehicles, the south flow on Petersfield Road can be shifted into the hatching. The shifting of the carriageway into the hatching would allow for greater stacking capacity of left turn movements but also allow for an additional refuge island for the traffic signals.

### **Travel Plan:**

The transport assessment addendum states, that the provision of a residential Travel Plan is considered to assist in achieving the highest levels of sustainability mobility as possible by informing residents of sustainable travel patterns and promoting their use. However, no travel plan has been provided. Confirmation is therefore required in regard to the applicant providing a travel plan to assist in the vision led approach to their site, noting the proposed development falls short of the threshold for requiring a travel plan.

### **Recommendations:**

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

Further Response 28<sup>th</sup> October 25

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 assessment 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 Kingtwood 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

TEMPPro 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.

## **Environmental Health**

### Final Comments 11<sup>th</sup> April 2026

The Cass Allen document entitled 'Noise Assessment | Bartons Road, Havant | Report reference: RP01-24394-R4' (dated 18<sup>th</sup> March 2026) has been reviewed. I am satisfied that the report has considered appropriate guidance and that the methodologies and findings are reliable.

The report demonstrates that WHO and BS8233 target internal noise levels can be achieved in all dwellings subject to appropriate noise mitigation measures, and that target external noise can be achieved in most external amenity areas.

The report concludes that SOAEL shall be avoided with respect to commercial noise impact.

Given the findings of the report, Environmental Health is satisfied that permission should not be refused on noise grounds.

Should permission be granted, the following conditions are recommended.

### **Construction Environmental Management Plan**

No development (including demolition) shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the Local Planning Authority. The approved CEMP shall be adhered to throughout the construction period.

The CEMP shall include, but not be limited to, the following:

- a) Development contacts, roles and responsibilities
- b) An indicative programme for carrying out the works
- c) Parking of vehicles of site operatives and visitors
- d) A public communication strategy, including a complaints procedure
- e) Loading and unloading of plant and materials
- f) Storage of plant and materials used in constructing the development
- g) Security hoarding, including decorative displays where appropriate
- h) Wheel-washing facilities
- i) Measures to control dust and dirt emissions during construction
- j) Measures to control noise and vibration during construction
- k) A scheme for recycling and disposing of construction/demolition waste
- l) Construction working hours, which shall restrict all construction activities (including deliveries and the movement of construction vehicles) to: 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays, with no construction activities on Sundays or Public Holidays

### **Notes:**

The noise control element of the CEMP shall demonstrate that Best Practicable Means shall be implemented, guidance can be found in BS5228-1:2009 and the CIEH document 'London Good Practice Guide: Noise & Vibration Control for Demolition and Construction, 2016'.

The dust-control element of the CEMP shall include a site-specific Dust Management Plan prepared in accordance with the IAQM Guidance on the Assessment of Dust from Demolition and Construction (2024).

**Reason:** To protect the amenity of residents living in the vicinity of the site.

### **External Lighting**

No external lighting shall be installed until details have been submitted to and approved in writing by the Local Planning Authority, prior to the commencement of

the development. This submission shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). The approved scheme shall be installed, maintained, and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.

External lighting shall be designed and installed in accordance with ILP Guidance Note 1 for the reduction of obtrusive light, 2021.

**Reason:** To protect residents from light pollution

### **Noise levels**

Prior to above-ground works, details of a scheme for protecting the proposed dwellings from external noise shall be submitted and approved in writing by the Local Planning Authority. Such a scheme shall ensure that upon completion of the development, the following noise criteria (as recommended in BS8233:2014 and WHO guidance) shall be met:

- i. all bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A)
- ii. all living rooms and bedrooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)
- iii. LAmax,F noise levels shall not exceed 45 dBA more than 10 times between 23.00 – 07.00 hours inside bedrooms
- iv. External amenity areas will achieve noise levels consistent with the guideline values set out in BS 8233:2014
- v. Where boosted mechanical extract ventilation is necessary to assist with the control of overheating, noise from these systems while operational shall not normally exceed NR25 within bedrooms and NR30 within living rooms (the NR curves are described within Annex B of BS 8233:2014).

A noise validation report demonstrating compliance with these noise criteria shall be submitted to and approved by the Local Planning Authority before any dwelling is occupied. The assessment shall include representative sampling from a minimum of 5 dwellings exposed to the highest road traffic and commercial noise levels. This assessment shall be conducted with the approved ventilation strategy operating (e.g., trickle vents in the open position, or mechanical ventilation systems running). Such noise protection measures shall thereafter be maintained and operated in accordance with the approved scheme.

**Reason:** To protect the amenity of future residents

### **Noise from building services plant**

The combined noise rating level (LAr,Tr) of plant and equipment shall not exceed 48dB LAeq, 1hr/ between the hours of 07.00hrs – 23.00 hrs and 37dB LAeq, 15 mins between the hours of 23.00hrs and 07.00hrs when measured in 'free-field' conditions at any height above ground and 1.0 m from the nearest noise sensitive property façade.

A noise validation report demonstrating compliance with these noise criteria shall be submitted to and approved by the Local Planning Authority before any dwelling is occupied.

**Reason:** To protect the amenity of residents

### **Acoustic barriers**

Acoustic barriers and fencing shall be installed in accordance with Appendix 6 of the Cass Allen Noise Assessment Report reference: RP01-24394-R4' (dated 18th March 2026).

Prior to their installation, details of the proposed acoustic barriers and close boarded fencing shall be submitted for the written approval of the Local Planning Authority. This shall include the materials, specification, dimensions and mass of the barriers and fencing, and elevation details at a scale of 1:50, 1:100 or as appropriate. The development shall then be carried out in strict accordance with the approved details, and the barriers and fence shall be maintained and retained at all times in perpetuity.

**Reason:** to protect the amenity of future occupiers

**Informative Note**

Building Control should be made aware that a closed window strategy is relied upon throughout the site to ensure that guideline internal noise levels are achieved, this should be considered regarding provision of purge ventilation for the purpose of controlling overheating.

Further Comment (uploaded 26<sup>th</sup> Feb 26)

I have reviewed the applicant's response. Unfortunately, the response does not resolve the key issues raised previously.

No further mitigation has been proposed at this stage to demonstrate that noise from SSE plant can be sufficiently mitigated in affected gardens or inside plot 42.

The consultant's statement that noise will be "audible" inside Plot 42 is ambiguous and does not provide any meaningful assessment of impact. For low frequency hum, audibility alone can indicate adverse effects or even significant adverse effects, depending on level, character, and duration.

It is necessary to establish whether suitable noise conditions can be achieved at all plots. The applicant is currently asking the LPA to determine the application without first demonstrating that mitigation is actually achievable. Based on the information provided, it remains unknown whether the SSE plant noise can be mitigated to avoid LOAEL or SOAEL inside Plot 42 or gardens located towards the south-east of the site.

Further acoustic information is therefore required before the application can be determined. This must include:

- 1/3 octave analysis of the SSE louvre noise inside Plot 42 and affected gardens relative to recognised low frequency noise criteria (e.g. DEFRA NANR45 curves or similar).
- A clear determination of whether SOAEL can be avoided at all plots by implementing mitigation measures, taking account of the plant operating times and low frequency characteristics.

Without the above information it is not possible to conclude that an acceptable noise environment can be achieved at all plots, and the application should not be approved with reliance upon conditions to address noise concerns.

If the applicant cannot demonstrate that SOAEL will be avoided across all affected plots, Environmental Health (pollution) would not support the application based on noise concerns.

#### Further Comment (Noise) 2<sup>nd</sup> Feb 26

The latest revision of the Cass Allen Noise Assessment [report reference RP01-24394- R1] has been reviewed.

The amendments to site layout and dwelling orientation improve the acoustic outcome resulting in dwellings being more effectively positioned to provide acoustic screening to gardens from commercial plant noise generated at the SSE site to the east.

Despite the proposed 2.4m high acoustic fencing at the worst affected plots, it is anticipated that plant noise from the ground floor louvre at the SSE site is still expected to be audible inside plot 42 and in the garden of plot 52. The noise is dominant in the 100Hz range and described as a low hum.

This type of constant low frequency noise can be significantly noticeable and annoying even at low levels.

Given that the above plots remain exposed to plant noise from SSE, the applicant is requested to consider whether further noise mitigation measures could be implemented, such as:

- Installation of an acoustic barrier of significant mass ( $>25\text{kg/m}^2$ ) and adequate height along the boundary with the SSE site to provide increased attenuation of low-frequency noise
- Re-orientation of plots 50-52 to use the buildings to screen the garden at plot 52
- Orientation of the internal layout of plot 42 to move habitable rooms away from the exposed facade with non-habitable rooms positioned on the noisier elevations.
- Installation of MVHR in plot 42 with no facade ventilators to minimise noise ingress

Should all or any of the above measures be feasible, further modelling should be carried out to quantify effectiveness.

Whilst specific mitigation measures will ultimately be agreed at the detailed design stage, it is necessary at this stage of the planning process to establish whether noise from commercial plant at the SSE site can be effectively mitigated at all affected plots prior to determination.

#### Further Comments uploaded 23<sup>rd</sup> Jan 2026

Can you please include the following condition regarding noise from air sourced heat pumps.

Prior to the installation of any air source heat pump (ASHP) or other external domestic building services plant, a noise impact assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be carried out in accordance with BS 4142:2014+A1:2019 and shall demonstrate that the rating level of noise emitted from the plant will not exceed the existing background sound level at any noise-sensitive receptor.

Where the assessment identifies the need for mitigation, a scheme of works shall be submitted to and approved by the Local Planning Authority. All approved mitigation measures shall be installed prior to first operation of the plant and shall be permanently retained for the lifetime of the development

**Reason:** in the interests of residential amenity and to ensure the details are acceptable to the Local Planning Authority

Further Comments uploaded 14<sup>th</sup> October 25

Thank you for consulting Environmental Health regarding the above application. The following comments relate to noise only.

I have reviewed the Cass Allen noise assessment report (Ref: RP01-24394-R0). The environmental noise survey identifies the dominant noise sources at the proposed development site as road traffic noise from the B2149 and Barton Road, and mechanical/plant noise from the adjacent SSE building.

The assessment has been undertaken in accordance with ProPG: Planning & Noise (2017), including a Stage 2 assessment. The report states that noise from surrounding sources has been mitigated “as practicably as possible” through the positioning of dwellings and gardens, within the constraints of the site. Acoustic glazing, acoustic ventilators, and mechanical extract ventilation are recommended across all dwellings to ensure internal noise criteria are met.

However, ProPG 2017 advises that the optimum acoustic outcome should be achieved through design, orientation, and layout of buildings. It appears that a more effective acoustic outcome could be achieved by incorporating continuous housing frontages along the northern and western boundaries to act as physical noise barriers, thereby shielding internal areas of the site from the dominant road traffic noise sources.

With consideration to the above, the applicant is requested to provide further information:

- Explaining the site constraints that prevent the use of continuous housing frontage as acoustic screening.
- Demonstrating how the current layout and orientation of dwellings achieves the optimum acoustic outcome in accordance with ProPG 2017.

Additionally, while the predicted internal noise level from the SSE building is reported to be 29 dB(A) within the bedroom of Plot 55, the audibility of commercial noise within a proposed residential dwelling raises concern. This outcome does not align with the principles of Policy CS16: High Quality Design, which seeks to avoid unacceptable harm to residential amenity, including from noise.

### **Environmental Health (Environmental Control Officer)**

19<sup>th</sup> December 2025

#### Observations / Comments:

I have now reviewed the application supporting documentation, alongside comments made by Environmental Health in respect of prior schemes, and comments from a selection of relevant third-party consultees.

### *Air Quality – development as receptor*

In line with previous comments, it is considered to be very unlikely that the proposed development would create new unacceptable exposure to existing poor air quality.

### *Air Quality – development as source*

The development quantum of this revised scheme also now falls below the screening level for industry air quality guidance for assessing the significance of the magnitude of emissions changes resulting from development; there is no need to comment on the traffic demand or distribution as it is not necessary for these assumptions to underpin an air quality assessment.

It is also noted that the Design & Access statement states at 3.2 7) that it is proposed that the properties use heat pumps as the primary means of meeting space/water heating demand, and savings against Part L requirements (section 5.1 of the statement) rely heavily on this proposal. It is not stated whether the properties will be provided with a domestic gas supply, or whether this will be a cost-offset which helps facilitate the domestic heating solution – if electric cooking appliances are also selected, then development building emissions will be significantly reduced relative to a scheme which uses gas as a primary fuel for space/water heating & cooking.

### *Air Quality – emissions offsetting*

Given that the current application pre-dates the codification of the future homes standard under UK building regulations (which would make the specification of air source heat pumps more or less mandatory), the proposal to specify this water/space heating solution makes a positive contribution towards the emerging Air Quality policy.

Otherwise, I note that significant concerns have been raised by others in respect of these proposals that can only be resolved through a significant revision to the development layout, potentially affecting deliverable quantum, and so also viability.

I similarly note that the comments I have seen pre-date a material revision to the proposed development layout, dated December '25. It is anticipated that those consultees will need to be reconsulted on the revised layout. In my informal/interim response, I had highlighted some of the concerns raised by other consultees that would find support within the emerging air quality policy; summarised below alongside an additional comment where the revised layout makes a material change;

#### *Landscapes (consultee comments) –*

- Insufficient landscape buffer, breaking up of parking massing (with planting)
  - o Landscape buffer improvement is noted south of parking to plots 59-90
  - o Parking massing may remain a problem, especially around plots 34 & 35
- Lack of footpath link to/via NW corner of site – extending sustainable & active travel distances (not serving obvious desire-lines)
  - o A footway provision to Martin Road is depicted, though as references in the a point above, the standard of connection that can be achieved under the revised proposals is unclear.

#### *County Highways (consultee comments) –*

- Bus stop improvements not integrated with active travel (pedestrian link to S)
  - o Revised layout appears to confirm a pedestrian link to the South, but is reliant upon an 'existing footpath', which is a relatively narrow hardstand.
  - o It is unclear whether it is proposed to upgrade the existing hard surface, or to simply to exploit it's presence.
  - o It would be desirable to renew & widen the existing provision – ideally to make it suitable to accommodate cycles
  
- Safety issues (various) associated with site access and internal road layout – discourages active travel modes, both cycling and pedestrians.
  - o I will defer to the County Highway Authority to comment authoritatively on the revised road/parking layout and associated vehicle tracking.
  - o The revised layout does provide a solution to the football club access that appears capable of addressing the concerns highlighted in this specific respect.
  
- No proposal for development to assist in priority sustainable & active travel infrastructure enhancements (shared use footway provision from Petersfield Road to Martins Road, connection to Martin Road and the sparrow crossing of Bartons Road)
  - o The revised proposal depicts both the sparrow crossing at Bartons Road and the creation of a shared use footway between Petersfield Road and Martin Road, on the South side of Bartons Road.
  - o A footway provision to Martin Road is depicted, though as references in the a point above, the standard of connection that can be achieved under the revised proposals is unclear.
- Lack of provision of visitor cycle parking – particularly for flats
  - o Design & Access statement section 3.8 appears to confirm adequate provision.
  
- Right-turn stacking lane omitted from proposals – a previous requirement borne of concerns about disproportionate network flow effects which are not development-quantum dependent (e.g. blocking of extant network traffic during periods of peak demand).
  - o The revised layout appears to reinstate the Right-turn stacking lane junction arrangement for development access, incorporating in addition a yellow-box arrangement for Westbound traffic.
  - o A Right-turn stacking lane for Knightwood avenue is also included on the layout, alongside pedestrian refuge between the development access and Moorgreen Rd.
  - o It appears that that this is achievable within the available width of green verge, it is assumed that is within the jurisdiction of the Highway authority to authorise/implement.

The revised proposals address a number of the air quality- (sustainable & active travel-) relevant issues raised by others against the superseded proposed layout. Safety aspects associated with large vehicle tracking, and the internal link between Bartons Road and Martin Road (or in particular, the quality of the link from the site, to the South, to Martin Road) remain the only outstanding issues which might find support under the emerging air quality policy – notwithstanding considerations of proportionality relative to achievable quantum.

I would suggest that the air quality policy carries insufficient weight at this stage to sustain any objection to the revised layout without substantial policy support in other areas (e.g. travel, access, landscape), and so as a result, no objections arise.

*Noise – Air Source Heat Pumps (ASHPs')*

I note that prior comments submitted by my nuisance & amenity colleagues on 14/10/2025 did not identify the proposal to specify ASHP's for all units, and consequently did not address these as a material source of noise.

Neither the superseded nor revised site plans indicate the proposed positions of ASHP units, and none are shown on building elevations, floor or roof plans.

The noise report pre-dates the material change to the proposed layout, and was in any event produced in the absence of a detailed design for any 'proposed mechanical plant' (section 7). It is evident from this section that the BS4142 assessment, and consequently the values given in Table 8, relate to the impact upon receptors external from an assumed noise source. The report has not addressed the impact of external plant on the proposed noise-sensitive receptors represented by the future occupants.

In the absence of detailed spatial proposals (or principles), it's not possible to undertake an MCS 020 compliant assessment for each unit, to ensure compliance with the 42 dB LAeq limit; and indeed, none appears to have been presented. It is worth noting that the above-quoted limit is the centrally defined test applied for permitted development purposes, and is regarded by our Officers as high (possibly insufficient for the purposes of detailed planning), and that it does not account for background noise levels, multiple similar noise sources (e.g. whose operation will have a common driver – e.g. external air temperature-), or reflections from hard surfaces (building facades, hard standings – reflections have a multiplication effect) – all of which could be potentially relevant on a relatively high density scheme. Notwithstanding that the Future Homes Standard may in future make these matters for Building Control, it is my understanding that they are presently material planning concerns.

From a planning perspective, the visual impact, and/or impact on private amenity spaces can't be understood without detailed proposals – given the possibility that this might affect layout and appearance of buildings; detailed proposals may be needed prior to the determination of the detailed scheme.

Given the status of the application, it is possible that some plot specific MCS 020 assessments may be required alongside a BS4142 assessment for other areas of the site (e.g. for multiple units installed on the NE residential accommodation block, or for a conceptual noise exposure worst case), to consider the impact upon the nearest within-development residential receptors.

It is also worth noting that that specification of ASHP's may raise additional/related material planning matters, e.g. the impact of the externally mounted equipment on the aesthetic quality of the elevations (&/or the internal layout where service risers are required) – particularly in respect of the NE accommodation block.

### *Pollution/Drainage*

I note that Portsmouth Water has recommended a related drainage condition, and that the LLFA has conversely required information prior to determination on grounds of inadequately demonstrated capacity (timetable for improvements). The LLFA did not make any comment on pollution control, though I note that the general surfacewater management scheme described in the Design & Access Statement relies heavily on permeable paving, which will provide a substantial contribution pollutant treatment.

Notwithstanding the overall capacity issues highlighted by others, I am comfortable to address C759 compliant pollution control by means of a condition, as recommended by Portsmouth Water.

### *Ground Contamination*

I have reviewed the following documents;

- Forge Environmental Management Ltd. Interpretive Site Investigation and Remedial Strategy Report Ref HAV164.D/SI/002 (March 2020)
- BRD Environmental Ltd. Phase 1 Geo-Environmental Desk Study Ref BRD4469-OR1-B (July 2025)
- BRD Environmental Ltd. Phase 1 Geo-Environmental Site Investigation Ref BRD4469-OR2-C (July 2025)

The following report was not available at the time of writing;

- SoilTechnics Ltd. [Phase 2] Ground Investigation Report Ref STM3168D-GD1 (May 2016)

I broadly agree that the additional Phase 2 Investigation undertaken by BRD has not identified any contamination of particular concern.

However, I also note that the work did not review prior planning comments, and whilst the desk study did note the presence of a possible storage tank ('contents unknown'), this feature was not targeted by the investigative work.

Some research shows that the feature in question represents a large fuel storage tank serving an (adjacent) high capacity containerised generator set, present at the site from ~1991~2010. It's position corresponds to the private rear gardens of 4 no residential units under the superseded layout, and the footprint of plots 17-20 under the revised layout.

I note that Groundwater results taken across the 2020 & 2025 investigations have identified fuel derived contaminants in two different locations – in 2020, potentially down-gradient of the on-site source (former diesel tank), and in 2025, potentially down-gradient of the off-site garage. The former is of greater concern, as it hints at a possible significant local source in an un-investigated area of the site that is coincident with a sensitive receptor. The reported results (showing no significant contamination impact) should not be assumed to be representative of that area of the site, for the principal reason that the trial holes in this region of the site (as reported in the available documents) were advanced for the purpose of determining the quality of the material within the stockpile, and not for the purpose of investigating the underlying ground.

I do not agree the reports recommendation to implement an engineer-supervised watching brief to address this risk as the sole risk management measure – I would instead consider that this feature requires formal investigation.

It is noted that this region of the site remains covered by a large stockpile of crushed concrete, and cannot be investigated until this has been moved/distributed.

I would highlight that I have had the opportunity to review the 2016 intrusive investigation referenced in the desk study. That report was undertaken prior to demolition (when the stockpile was absent) and it may have targeted the area of the

fuel storage/generator. Submission of this report may be sufficient to address my objection, given the otherwise favourable (or at least, agreed to be 'not significant') results reported in the 2025 BRD report.

In the even that the 2016 report cannot be made available, I would suggest that any positive determination of this application should be conditional on the completion of a proportionate investigation & assessment of this potentially contaminating feature, and where appropriate, the remediation of affected land. Suggested bespoke wording, below;

Contamination (omitting EDS) [1]

*Prior to the commencement of any development within a 5m external buffer to plots 16-20 (as shown on Drawing no. 1110 rev D 31/07/2025, revdate 04/12/2025), an assessment of the presence, nature and extent of contamination shall be submitted to- and approved in writing by-the Local Planning Authority. The assessment shall account for the findings of prior site investigation reports, be undertaken by competent persons, and the findings be presented as a written report.*

*The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;*

*1) Site investigation appropriate to the potentially contaminating landuse features formerly present in this region of the site; to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting these plots, and to inform an appropriate assessment of the risks to future occupants.*

*2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes; • appropriately considered remedial objectives, • an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and; • clearly defined proposals for mitigation of the identified risks.*

*3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.*

*All elements shall be adhered to unless agreed in writing by the Local Planning Authority*

**Reason:** *To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&/or activity). Contamination could pose a risk to future occupiers of the affected plots"*

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition [1] shall be submitted to and approved in writing by the Local Planning Authority.*

*The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met.*

**Reason:** *To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&/or activity). Contamination could pose a risk to future occupiers of the affected plots"*

## **Housing**

### Final Comments 11<sup>th</sup> February 26

Housing: Current planning policy requirements Core Strategy policy CS9. 2, 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.

This development is proposed for 90 units consisting of 1- & 2-bedroom flats, and 2-, 3-, & 4-bedroom houses; the developers would be expected to deliver a policy compliant 27 (30%) to 37 (40%) new affordable homes across the site.

The applicant's proposal for the affordable provision is now 50% (45 units) of the total site, which although above policy requirements, is a welcome addition due to the consistent demand, but severe shortage, of social housing in our area:

| Dwelling type | Tenure                 | Bedrooms | Persons | GIA Area sqm | Number    |
|---------------|------------------------|----------|---------|--------------|-----------|
| Apartment     | Affordable/Social Rent | 1        | 2       | 51.2 av      | 11        |
| Apartment     | Affordable/Social Rent | 2        | 4       | 70.00 av     | 21        |
| House         | Affordable/Social Rent | 4        | 6       | 125.23       | 2         |
| House         | Affordable/Social Rent | 3        | 5       | 98.48        | 2         |
| House         | Shared Ownership       | 2        | 4       | 82.96        | 5         |
| House         | Shared Ownership       | 3        | 5       | 98.38        | 4         |
| <b>TOTAL</b>  |                        |          |         |              | <b>45</b> |

The mix of accommodation across the entire site appears to be a satisfactory one with homes of all types and sizes to meet a variety of needs, and I am now satisfied

that the affordable provision has been improved sufficiently (including 2 no 3B5P houses for rent), and now provides a mix that would meet the varying demands of our rented waiting list applicants detailed below. As at 11/02/2026 there are 1539 active applications registered on Hampshire Home Choice (HHC) All applicants are seeking rented accommodation of all sizes in our area:

|             | Band 1 | Band 2 | Band 3 | Band 4 | Grand Total |
|-------------|--------|--------|--------|--------|-------------|
| 1           | 9      | 72     | 536    | 34     | 651         |
| 2           | 1      | 19     | 457    | 8      | 485         |
| 3           | 5      | 25     | 294    | 3      | 327         |
| 4           | 1      | 20     | 53     |        | 74          |
| 5           |        | 1      |        |        | 1           |
| 6           |        | 1      |        |        | 1           |
| Grand Total | 16     | 138    | 1340   | 45     | 1539        |

The demand for affordable housing remains consistently high within Havant borough as applicants continue to grapple with high rents in the Private Rented Sector, and high house prices making home ownership more difficult to achieve.

Between April 2024 to March 2025 (latest available data), for Band 3 applicants, which reflects a reasonable priority for moving, the time between registration and nomination was an average of between 2 years 11 months, and 6 years 11 months, depending on the property size required. Although there are fewer applicants for 3- and 4-bedroom homes, their wait is longer. In fact, the average waiting time for a larger 4+ bedroom home is still not able to be calculated due to there being no lettings of this size of property for that year. Applicants in Band 2 (which reflects a high priority for moving), had an average wait time of 3 years 4 months for a 4+ bedroom home so I am pleased to see that a couple of these larger 4-bedroom homes has been included in the affordable provision.

Our usual starting point for tenure split is 70% rented/ 30% Shared Ownership. The applicants have proposed a tenure split of 74% rented/26% Shared Ownership which is acceptable.

Now that the net internal area of the apartments has been confirmed, I am content that these will accommodate 2 persons in the 1-bedroom flats, and 4 persons in the 2-bedroom flats therefore helping to meet the needs initially of our smaller family applicants.

I am happy to see that the applicants have confirmed that some of the new homes will be constructed to M4(2) and M4(3) standards to enable use by residents with disabilities/mobility needs.

Once developed, and subsequently transferred to the Registered Provider, any affordable homes for rent will be required to be advertised through Hampshire Home Choice, and the weekly rental will be capped at Local Housing Allowance Rates at first, and every subsequent letting.

The site's location provides easy access to the town centre and is well placed to enable any new residents to have use of local services, including retail, transport, education, and medical facilities.

Moving forward Housing would support this residential development proposal in principle as there is a severe shortage of affordable homes to meet our high needs.

#### Comments 11<sup>th</sup> Nov 25

#### Housing:

Current planning policy requirements Core Strategy policy CS9. 2, 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.

This development is proposed for 90 units consisting of 1- & 2-bedroom flats, and 2-, 3-, & 4-bedroom houses; the developers would be expected to deliver a policy compliant 27 (30%) to 37 (40%) new affordable homes across the site.

The applicant's proposal for the affordable provision is now 51% (46 units) of the total site, which although above policy requirements, is a welcome addition due to the consistent demand, but severe shortage of social housing in our area:

| Dwelling Type | Tenure           | Bedrooms | Persons | Area sqm | Number |
|---------------|------------------|----------|---------|----------|--------|
| Apartment     | Affordable Rent  | 1        | 2       | 51.2 av  | 11     |
| Apartment     | Affordable Rent  | 2        | 4       | 70.00 av | 21     |
| House         | Affordable Rent  | 4        | 6       | 112.97   | 2      |
| House         | Shared Ownership | 2        | 4       | 79.25    | 3      |
| House         | Shared ownership | 3        | 5       | 100.61   | 9      |
| Total         |                  |          |         |          | 46     |

The mix of accommodation across the entire site appears to be a satisfactory one with homes of all types and sizes to meet a variety of needs, but the affordable provision, although better than that proposed at pre-app stage, does not provide a mix that would meet the varying demands of our rented waiting list applicants detailed below. I would

As at 11/11/2025 there are 1532 active applications registered on Hampshire Home Choice (HHC) All applicants are seeking rented accommodation of all sizes in our area:

|   | Band 1 | Band 2 | Band 3 | Band 4 | Grand Total |
|---|--------|--------|--------|--------|-------------|
| 1 | 9      | 72     | 536    | 30     | 647         |
| 2 | 5      | 39     | 437    | 8      | 489         |
| 3 | 3      | 27     | 290    | 4      | 324         |
| 4 | 1      | 17     | 52     |        | 70          |
| 5 |        | 1      |        |        | 1           |
| 6 |        | 1      |        |        | 1           |

|             |    |     |      |    |      |
|-------------|----|-----|------|----|------|
| Grand Total | 18 | 157 | 1315 | 42 | 1532 |
|-------------|----|-----|------|----|------|

The demand for affordable housing remains consistently high within Havant borough as applicants continue to grapple with high rents in the Private Rented Sector, and high house prices making home ownership more difficult to achieve.

Between April 2024 to March 2025 (latest available data), for Band 3 applicants, which reflects a reasonable priority for moving, the time between registration and nomination was an average of between 2 years 11 months, and 6 years 11 months, depending on the property size required. Although there are fewer applicants for 3- and 4-bedroom homes, their wait is longer. In fact, the average waiting time for a larger 4+ bedroom home is still not able to be calculated due to there being no lettings of this size of property for that year. Applicants in Band 2 (which reflects a high priority for moving), had an average wait time of 3 years 4 months for a 4+ bedroom home so I am pleased to see that a couple of these larger 4-bedroom homes has been included in the affordable provision.

Our usual starting point for tenure split is 70% rented/ 30% Shared Ownership. The applicants have proposed a tenure split of 74% rented/26% Shared Ownership which is acceptable.

I am still very concerned that all the flats proposed on the site (32 units all in one single block) have been designated as part of the affordable provision. However now that the net internal area has been confirmed, I am content that these will accommodate 2 persons in the 1-bedroom flats, and 4 persons in the 2-bedroom flats therefore helping to meet the needs initially of our smaller family applicants.

There are several 2-bedroom houses (9) proposed for the site, and 40 x 3 -bedroom homes, however no 2 bed houses, and only 9 x 3-bedroom homes (as Shared Ownership, not rented) have been included in the affordable provision. I would like to see some 3-bedroom homes form part of the affordable offer.

I am happy to see that the applicants have confirmed that some of the new homes will be constructed to M4(2) and M4(3) standards to enable use by residents with disabilities/mobility needs.

Once developed, and subsequently transferred to the Registered Provider, any affordable homes for rent will be required to be advertised through Hampshire Home Choice, and the weekly rental will be capped at Local Housing Allowance Rates at first, and every subsequent letting.

The site's location provides easy access to the town centre and is well placed to enable any new residents to have use of local services, including retail, transport, education, and medical facilities.

Moving forward Housing would support this residential development proposal in principle as there is a severe shortage of affordable homes to meet our high needs. However, I would expect the applicants to review their proposals to see if some 3-bedroom homes could be provided as Affordable/Social Rent tenure.

## **Hampshire Fire & Rescue Service**

Further Comments 24<sup>th</sup> December 2025

## General Guidance in respect of Planning Applications deemed to present a low- or medium- level of risk.

### Access for Fire Appliances

Vehicular access to each building on-site should conform to the guidance contained within the relevant version of Approved Document B. Whilst it is acknowledged that Building Regulations guidance is not typically considered at the planning stage, it is observed that road layouts may be difficult to alter once planning permission is granted.

It is therefore strongly recommended that the roadway layouts be reviewed in line with this guidance to resolve any perceived issues at an early stage.

### Access for High-reach Appliances

High reach appliances currently operated by the HIWFRS exceed the maximum requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high-reach appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building.

### Water Supplies

Additional water supplies for firefighting may be necessary. You should contact the Water Management Team, Hampshire & IOW Fire and Rescue Headquarters, Leigh Road, Eastleigh, SO50 9SJ (hydrants@hantsfire.gov.uk) to discuss your proposals.

### Fire Protection

HIWFRS would strongly recommend that consideration is given to the installation of Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

HIWFRS is fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact of fire on the wider community.

### Fire-fighting and the Environment

Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

### Timber-framed Buildings

These types of buildings are particularly vulnerable to severe fire damage and fire spread during the construction phase.

The UK Timber Frame Association publication '16 Steps to Fire Safety on Timber Frame Construction Sites' provides guidance on this issue and is available from:

<https://www.structuraltimber.co.uk/wp-content/uploads/2024/01/16stepstofiresafety-3.pdf>

This guidance should be read in conjunction with the 'Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation', published by the Construction Confederation and The Fire Protection Association (Sixth Edition, ISBN 1-902790-33-2)

Copies of the 'Joint Codes of Practice' and useful sister publication, 'Construction Site Fire Prevention Checklist' (Second edition, ISBN 1-902790-32-4), are available for purchase from the Fire Protection Association: ([www.thefpa.co.uk](http://www.thefpa.co.uk)) and from the Construction Industry Press:

(Publications for Construction Professionals and Builders | CIP Books)

Original Comments uploaded 23<sup>rd</sup> September 25

#### Issues under the Regulatory Reform (Fire Safety) Order 2005 (FSO).

The application, taking into account the matters identified within your endorsement, the additional information provided, and subject to the satisfactory resolution of Points 1 to 8 below, the consultation is likely to demonstrate compliance with the Regulatory Reform (Fire Safety) Order 2005. It should be ensured that if any material amendments to the proposal as contained within this application are proposed, a further consultation is carried out.

1. Please ensure that the fire alarm and detection system conform to BS 5839-6 / Grade A / LD1, or BS 5839-1 Category L2. The evacuation strategy should be simultaneous. The fire alarm panel should be located adjacent to the exit door from the building at ground level.
2. Please ensure that the emergency escape lighting and fire exit signage are installed to the relevant British Standard to suit the new layout and changes.
3. Please ensure that the escape routes are protected in construction achieving at least 30 minutes fire resistance. The doors that open onto the escape routes should be FD30S self-closing fire doors. The means of escape corridors should be kept sterile.
4. Please ensure that cooking facilities (hob, oven, etc.) are at least 1.8m away from escape routes and doors.
5. Please ensure that there is a sound traditional construction between rooms.
6. Please ensure that all final exit doors lead to a place of ultimate safety (i.e. highway).

7. Please ensure that a Fire Risk Assessment is carried out by a competent fire safety professional prior to the building being occupied.

8. Reliance on escape windows [such as with inner-room bedroom arrangements]

Escape windows are only referred to in ADB v1 (Dwellings). Escape windows are not referred to in ADB v2 (Buildings other than dwellings). ADB v1 and V2, Table 0.1 indicates that Purpose Group 2 is addressed under ADB v2. HIWFRS therefore considers that for HMOs providing greater than six bedspaces, escape windows are not indicated by the ADB documents.

LACORS refers to existing premises and recommends against the use of escape windows in many HMOs. This guidance specifically prohibits the use of any locking devices on these windows and requires the landlord to ensure tenants are able-bodied individuals with no high-risk characteristics.

Consideration should be given to the impact of an accident, injury or illness that impairs the mobility or capability of the occupant either temporarily or permanently. In this case it is unlikely that the resident can be immediately relocated to alternative accommodation or prevented from sleeping in the room they have a tenancy agreement for. In this case, if the resident continues to sleep in this area despite not being capable of utilising the escape window, it is likely that the landlord will be failing in their duties under Article 14 of the Fire Safety Order.

Reference is made to Section 0.6 of Approved Document B, which states that unrealistic or unsustainable management arrangements cannot be considered to have met the requirements of the regulations. Given the matters identified above, it is unclear how this arrangement can be considered a realistic or sustainable management arrangement.

The Building Control Body is invited to reconsider this arrangement and provide justification as to how this arrangement can be considered tolerable under the Building Regulations 2010, The Regulatory Reform (Fire Safety) Order 2005, and the Housing Act 2004.

**NHS Hampshire and Isle of Wight 3<sup>rd</sup> October 25**

The following comments are provided by NHS Hampshire and Isle of Wight Integrated Care Board (ICB) as their response to this application.

The above-named application has been reviewed from a primary care perspective and has assessed that a contribution of £54,181 towards increasing primary care infrastructure is necessary to make the application acceptable in planning terms.

This letter provides a summary of the impacts of new housing developments on the primary care's capacity to provide health services, as well as a calculation of the contribution sought to mitigate the impact of the development on the local primary care infrastructure.

The following Appendices at the end of this provide additional information relevant to the ICB's contribution request:

- Appendix 1: Mitigation Methodology Calculation
- Appendix 2: The role and responsibility of Integrated Care Boards (ICBs) and Health and Wellbeing Boards

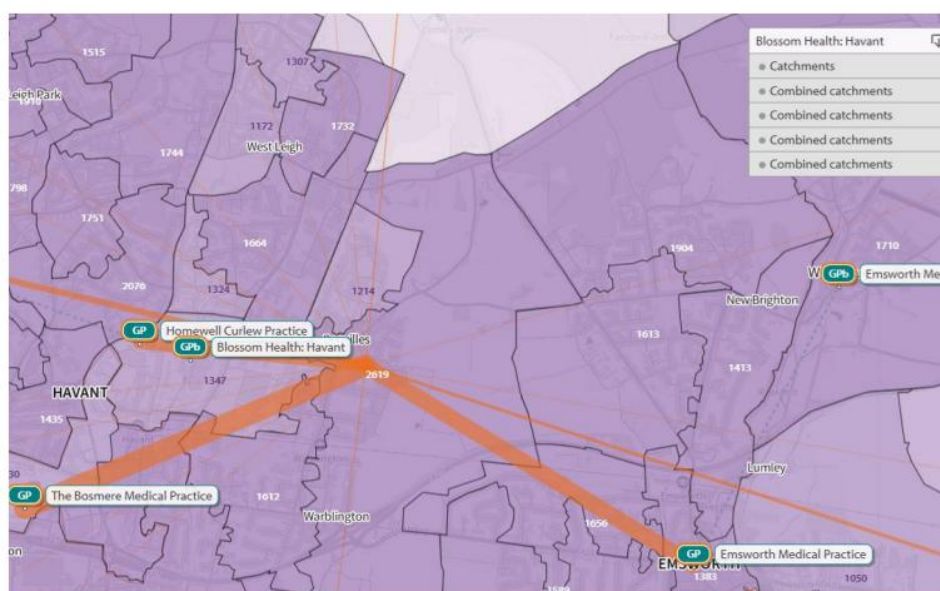
- Appendix 3: How GP facilities are funded
- Appendix 4: The planning policy context and decision-making process
- Appendix 5: Primary Care Cost per m2 (MIPS to PUBSEC) S106 Evidence

#### The Impact Created by the Proposed Development:

1. The proposed development is for 90 dwellings and this will create an estimated population of 205 new residents within the development based on an average household size of 2.28.

The closest GP surgeries to the proposed development are below and it is envisaged that the residents of the proposed development will register as patients with these practices.

| GP Surgery                   | Address                                                            | Primary Care Network      |
|------------------------------|--------------------------------------------------------------------|---------------------------|
| Blossom Health: Havant       | Havant Health Centre, Civic Centre Road Havant, Hampshire, PO9 2AY | Havant and Waterlooville  |
| Emsworth Medical Practice    | 6 North Street, Emsworth, Hampshire, PO10 7DD                      | Hayling Island & Emsworth |
| Homewell Curlew Practice     | Havant Health Centre, Civic Centre Road Havant, Hampshire, PO9 2AY | Strawberry Health PCN     |
| The Bosmere Medical Practice | Solent Road, Havant, Hampshire, PO9 1DQ                            | Havant and Waterlooville  |



2. The current combined medical centres providing primary care have insufficient capacity and will not be able to absorb the increased patients arising from the proposed development.

3. Below are projects being planned to increase patient infrastructure capacity to meet the increases in patient registration that this application will create.

- Blossom Health are currently undersized and following the publication of the NHS 10-year plan in July 2025, the ICB is currently reviewing the potential options for either a reconfiguration or expansion to meet the increases in demand from new housing developments. The practice are located in Havant Health Centre, which has opportunities to be reconfigured and expanded, subject to leases being in place.

- Emsworth Medical Practice have plans to reconfigure the internal space in the waiting room on the ground floor to create a new administrative room, allowing the existing admin room to become a consulting room. On the first floor, they intend to reconfigure the sub-waiting room to create an additional clinical room.

- Homewell Curlew Practice are currently undersized and following the publication of the NHS 10-year plan in July 2025, the ICB is currently reviewing the potential options for either a reconfiguration or expansion to meet the increases in demand from new housing developments. The practice are located in Havant Health Centre, which has opportunities to be reconfigured and expanded, subject to leases being in place.

- The Bosmere Medical Practice are currently undersized and following the publication of the NHS 10-year plan in July 2025, the ICB is currently reviewing the potential options for either a reconfiguration or expansion to meet the increases in demand from new housing developments.

The contribution requested will contribute to the increase in capacity required directly and only from this development. It may in future be pooled with contributions from other developments.

To account for other proposals that may come forward to increase primary care infrastructure in the affected geography, the ICB requests that the contribution is ringfenced for a future expansion project(s) relating to the practices and their PCNs, which can be drawn down once projects are viable, deliverable, and affordable to the practices.

We are able to provide further details of projects for CIL compliancy as required by the Local Planning Authority.

4. The only way to mitigate the impact is to increase the physical capacity of the existing surgeries. The ICB has carefully calculated the space needed to mitigate the impact, drawing upon the document "Health Contributions for GP Provision – Technical Note for Developers"<sup>1</sup>

1. [https://www.hantsiow.icb.nhs.uk/download\\_file/2933/0](https://www.hantsiow.icb.nhs.uk/download_file/2933/0)

The detailed calculation is attached to this document as Appendix 1. The calculation is directly linked to the proposed development and is fairly and reasonably related in scale and kind to the development.

5. Without the contribution to increase the physical capacity, the proposed development will put too much strain on the said health infrastructure, putting people at risk. Waiting times would increase and access to adequate health service would decline, resulting in poorer health outcomes and prolonged health problems. Such an outcome is not sustainable as it will have a detrimental socio-economic impact.

6. In addition, having no or limited access to primary care will have a knock-on effect on secondary healthcare, in particular on Emergency Department services, as those people who cannot access their primary care usually will present themselves at the Emergency Department adding additional pressure on the already stretched secondary care.

7. The development directly affects the ability to provide the health service required to those who live in the development and the community at large. Without securing such contributions, the ICB would be unable to support the proposals and would object to the application because the direct and adverse impact that the development will have on the delivery of primary health care.

#### Relevant Local Development Plan Policy:

8. The Havant Borough Council Policies states that:

#### Havant Borough Core Strategy March 2011

##### Core Strategy Theme Description

5. Housing and Infrastructure: New housing development is expected in all areas of the borough.....and that the homes are accompanied by all the necessary facilities such as health care.

Infrastructure includes roads, rail, footpaths, flood defences, health, education...

#### Policy CS1 Health and Wellbeing

*Planning permission will be granted for development which:*

*10. Protects and contributes to the availability of community facilities through refurbishment or new provision which can be justified by needs which are evident in the local district.*

#### Table 9.1 – Core Strategy Definition of Infrastructure (from the South East Plan)

Health: Acute care and general hospitals, mental hospitals, health centres/primary care trusts, ambulance services.

#### Policy CS21 Developer Requirements

*Development will be permitted if on-site and/or off-site infrastructure requirements are met.*

*Where new or improved infrastructure is essential for planning permission to be granted the council will require the on-site or off-site provision and/or contributions through planning obligations, agreements or tariffs in accordance with the relevant legislation for off-site provision. The need for contributions will depend on information and advice from infrastructure providers on the expected impacts of the development on all the infrastructure types.*

*Where appropriate the council will seek on-site provision or financial contributions to ensure the timely off-site or on-site delivery of all types of infrastructure as detailed in Table 9.1 under the following headings:*

1. *Transport*
2. *Housing*
3. *Education*
4. *Health*
5. *Social Infrastructure....*

*Thanking you for your consideration on this matter.*

## **Norse – Waste Strategy**

### **HCC Local Lead Flood Authority**

#### Final Comments 14<sup>th</sup> April 2026

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

The County Council has reviewed the following documents relating to the above application:

- Long Sections ref: 24-097-023

Further information has been provided to demonstrate the site levels, how properties would be elevated from the flow route and levels retained for continuity of the exceedance flows.

As such, this resolved the previous comment and we have no objection to the application.

#### Further Comments 16<sup>th</sup> March 2026

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

HCC as LLFA were consulted previously on this application and provided comments in our letters dated 21st October 2025 and 21st January 2026. We have been reconsulted following receipt of updated information.

The County Council has reviewed the following additional documents relating to the above application:

- Letter to LLFA – Charles and Associates 27.01.26
- Surface Water Flooding Depths 24-097-019 Charles and Associates Jan 2026
- Surface Water Flooding Depths EA Mapping 24-097-020 Charles and Associates Jan 2026
- Consultation Response – Southern Water 04.02.26

Following review of the above document HCC as LLFA has the following comments:

The submitted plans show the Environment Agency surface water flood map for depths which show the chance of flooding beyond the stated depth (for example 20cm). Areas with a chance of flooding below the stated depth is not shown. Shallow floods and shallow surface water flow routes are not shown. We recommend the EA Surface water flood map for flood extent is reviewed when preparing a flood risk assessment, as it is useful in identifying potential shallow (greater than 75mm depth) surface water flow routes. The EA flood extent map indicates the risk of significant surface water flow routes within the site boundary that are in continuity with the flow route outside the site boundary to the North and the area of high risk of surface water flooding in the Southeast corner of the site. Our comments are based on this surface water flood extents map, as stated in our previous letters. The effects of flow routes through the site must be taken into consideration, even at shallow depths, flood flows can generate large volumes of flood water over time. The LLFA do not believe this risk has been addressed in terms of the risk to the proposed development, or the possible effect on risk to areas outside of the site. Flow from outside of the site could also interact with and reduce capacity in the proposed surface water drainage system.

We previously requested confirmation of approval from Southern Water for the proposed surface water connection to the public sewer. We note that this has been provided in the response to Havant Borough Council in Southern Water Letter dated 4th February 2026.

Our concerns regarding surface water flood risk within the site remain. The EA maps indicate that significant areas of the site are subject to risk of flooding from surface water.

Based on the information that has been provided, the LLFA do not believe flood risk has been adequately assessed.

#### Further Comments 21<sup>st</sup> Jan 26

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

HCC as LLFA were consulted previously on this application and provided comments in our letter dated 21st October 2025. We have been reconsulted following receipt of additional / updated information.

The County Council has reviewed the following additional document relating to the above application:

- Technical Note Flood Risk Assessment and Drainage Strategy Addendum 24-097-RPT 008 Rev A Charles & Associates 05/11/25

The above document responds to the LLFA previous comments regarding this application in turn. Following review of the above document HCC as LLFA has the following comments:

#### Surface Water Flood Risk.

Based on the response in the above report it appears our previous comments have been misunderstood. Please refer to our previous comments for our current position on surface water flood risk within this site.

To clarify: the LLFA do not question the accuracy of the EA flood risk mapping and we do not suggest that modelling is required to assess the flood risk. The EA maps identify the site is subject to risk of flooding from surface water.

The screen shots included in both the submitted FRA and the FRA addendum show a map of High and Medium flood risk and also show a map of yearly chance of flooding depth over 30cm. These maps identify a potential flood flow route on the Western boundary of the site and indicate isolated areas of flood risk. A map of low flood risk has not been included in the FRA. Review of the full EA flood risk mapping (extent) indicates that there are other potential flood flow routes through the site, that have not been shown in the FRA and these flood routes appear to have been ignored. These flow routes must be maintained as overland flow routes to ensure flood risk is not increased elsewhere. Flood storage areas must also be maintained or compensated for. A sequential approach in masterplanning for new development is encouraged. This is confirmed in the principles of the new national standards for SuDS.

We note areas of existing flood illustrated within the plans in the above report do not correspond with the areas of flood risk shown on the EA maps.

If development is proposed in areas of high flood risk, catchment assessment and / or modelling needs to be undertaken to identify the source of the water and to demonstrate how it is to be mitigated. The area of flood risk to the south of the site

appears to be fed from flow routes on the eastern and western sides of the site so the provision of a SuDS scheme is not considered adequate as mitigation.

#### Infiltration

The above report confirms that high groundwater levels observed within the site and groundwater protection designation preclude the use of infiltration drainage. This resolves our previous comment regarding infiltration drainage.

#### National Standards

The response in the above report regarding compliance with the national standards are noted. We maintain that the approach taken is not compliant with the national standards and we do not accept the explanation provided in the above report which is a misinterpretation of the standards.

HCC are allowing a transition period for adoption of the new national standards. Although this drainage strategy is not compliant with the standards and therefore not considered in line with best practice, we consider the approach taken is acceptable and we would not object to the application for this reason alone.

#### Access Road Drainage

Clarification has been provided resolving our previous comment.

#### Proposed Surface Water Connection to Public Sewer

The response in the above document is noted. We require written confirmation of approval for the proposed connection including the discharge rate from the sewer asset owner.

We require this further information before we can make a decision on whether to recommend to the Local Planning Authority that planning permission is granted.

As a statutory consultee, the County Council has a duty to respond to consultations within 21 days. The 21 day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

Please ensure all data is sent to us via the relevant Local Planning Authority.

If you require additional guidance on providing the correct information, we recommend you use our Surface Water Management Pre-application service which will enable discussions with the reviewing engineer and scope out works that would address the points raised. For full details, please visit:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning> and click on pre-application advice request form.

This response has been provided using the best knowledge and information submitted by the applicant as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Original Comments: 21<sup>st</sup> October 25

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

This response does not reflect the position of Hampshire County Council as the Highway Authority. If there is a potential for the drainage features to be

offered for adoption, this will need to be discussed separately with Highways development planning as they might not be considered acceptable by the Highway Authority.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

The County Council has reviewed the following documents relating to the above application:

- Flood Risk Assessment and Drainage Strategy incl. appendix A-I 24-097-002 Rev A Charles and Associates 30.07.2025

Following review of the above document HCC as LLFA has the following comments:

The above report describes areas of Surface Water Flood Risk within the site as identified in the EA Surface Water Flood Risk maps. A clear surface water flood flow route and areas of potential flood water storage are identified. The above report assessed this risk as very low. The LLFA do not agree with this assessment. If flood risk areas (from any source) are identified, it must be demonstrated that the proposals including drainage attenuation features can be delivered without encroaching on these areas. If the flood risk areas are deemed inaccurate, modelling will be required before changes can be accepted. If development is proposed in these areas without modelling, compensation areas will be required and details on how the topography will be altered to ensure new development is not at risk. Modelling may also be required to support this. Loss of flood storage volume and obstruction of flood flow routes should be avoided. A plan overlaying flood risk mapping with the proposed development plans should be produced to aid assessment of risk.

It is encouraging to see the above report 1.2.1 refer to the newly published National Standards for SuDS. HCC LLFA do not currently require proposed developments to fully comply with the new standards but we do encourage adoption of these standards. Following review of the submitted information we consider that the proposed drainage strategy does not comply with the standards.

Site infiltration testing appears to indicate that there may be some limited potential for infiltration to ground. Best practice guidance states that opportunities for infiltration should be maximised in favour of lower priority discharge destinations. There may be an opportunity for partial infiltration to reduce the surface water discharge to the public sewer.

The site is within the Havant East catchment priority area as defined in the Hampshire County Council Lavant Catchment Management Plan.

We advise that the submitted drainage strategy has not been prepared in accordance with best practice. The proposed drainage design only considers the runoff contribution from impermeable areas and ignores runoff from permeable areas that would be intercepted by the proposed drainage network. The LLFA recommend a catchment based approach to drainage design taking into consideration contribution of runoff from both permeable and

impermeable areas. Recently published National Standards for Sustainable Drainage Systems (SuDS): standard 3 (3.32) also supports this approach.

It is not clear how the proposed access road is to be drained. It is not clear how some of the permeable paved parking areas are connected to the network.

We understand an upgrade may be required to the existing sewer but given the lack of capacity in the sewer network the effect of surcharge outfall should be considered. The available storage in the network appears to be well designed but particularly at the downstream end there is no available capacity during the 1:100 design storm to provide a buffer if the outfall is surcharged.

Approval for proposed surface water connection and discharge rate is required. The LLFA require written confirmation of approval of the proposed connection and surface water discharge into the public sewer before we are able to provide a recommendation to the LPA. Approval from Southern Water is required to demonstrate the proposed outfall is secured and therefore feasibility of the overall drainage strategy. Southern Water correspondence states that there is currently insufficient capacity in the sewer network to accommodate the proposed surface water discharge of 6.1l/s. We note the proposed discharge rate has subsequently been increased to greenfield rate of 7.2l/s.

Further detail will be required regarding the maintenance of the surface water drainage system. This requirement can be covered by condition if the application is granted.

We require this further information before we can make a decision on whether to recommend to the Local Planning Authority that planning permission is granted.

## **Landscape Team**

### Final Comments 29<sup>th</sup> Jan 26

Please see my comments on the revised comments drawings:

- The revised site layout has improved the landscape buffer to Peterfeild Road, however there is still a an approx. 30m length which does not provide sufficient space to plant mature trees. This design is an improvement on the original submission.
- The revised site layout has proposed additional breaking up of the car parking however we have concerns that the size of the proposed landscape areas are not big enough to offer any real benefit. i.e. They are too narrow to have sufficient space for trees to thrive or indeed be visually perceptible when all the surrounding parking bays are in use.
- The site does still not comply with back-to-back distances with regards to the block of flats and the houses in the north west of the site.
- Should the pedestrian access not be achieve due to a height difference of 1.25m. The provision for pedestrians must be improved to allow a 2m wide off carriageway

footpath to each pedestrian access point. This will help encourage sustainable transportation inline with HBC policies.

- The open space provision is an improvement on the original submission, however still below the guidelines.

**Officer Comment:** The proposals have been negotiated as far as possible in relation to the above matters. The application has been assessed on its planning balance merits in part 7 below.

Further Comments uploaded 2<sup>nd</sup> October 25

From a landscape perspective we have the following comments in relation to this application

- The existing character of Petersfield Road consists of mature trees lining the road to give a verdant character, the retention and enhancement of this character is essential to the successful integration of the proposals. At present the layout does not offer a sufficient landscape buffer along Petersfield Road to accommodate mature UK native tree. Planning policy 12 states development with be supported which: the application demonstrates to the local planning authority that it 'ii. Considers the features of the surrounding area or the main building to which the proposal relates, including density, heights, scale, massing, landscaping, existing building lines, setbacks, plot widths, depth and proportion in addition to external design characteristics such as roofs, windows, doors, external materials and architectural detailing; iii. Conserves and/or enhances the character of the area and appearance of the street scene, through appropriate design, scale and materials, and contributes to a harmonious overall relationship with the existing built form and spaces;

At present the layout does not conserves or enhance the existing character.

- The massing of the car parking should be broken up every 6 car and landscaping should be introduced in the form of trees and under planting. This is break up the overly hard landscaped areas.
- We have concerns with the height of the proposed block of flats and the distances to neighbouring properties. HBC design guides set out minimum back-to-back distances ;In order to maintain a reasonable relationship between new dwellings and neighbouring properties, the following minimum distances should apply: Where windows of the new development and an existing dwelling occur back-to-back there should be a minimum of 20 metres separation, Where a new dwelling or the development is more than two storeys in height an additional four metres per storey should be added to the separation distance e.g. a separation distance of 24 metres is required between the new three storey building and existing two storey dwelling. As such units should be spaced a minimum distance of 28m from the 3-storey block of flats. At present we have concerns with the detrimental impact units 13 - 18 will have as a result of close proximity to the large 3-stoery block of flats.
- We would welcome a pedestrian footpath link in the north west corner to encourage sustainable transportation.
- Boundary treatments which are prominent within the street scene must be brick wall and/or brick wall with fence.

- The site does not provide any meaningful open space with only a small parcel in the north west corner which appears to be an unmanaged grass meadow and scrub planting which will is not accessible and given the orientation of the block of flats feels private to the flats and not accessible to wider site. HBC policy provides minimum provision for open space for a development. A 2.5 person multiplier of 90 dwelling gives an approx. population of 225. This equates to 0.72Ha of open space, 0.12Ha of play space and 0.36Ha of outdoor sports and recreation. These open space requirements must be demonstrated to ensure the proposal align with HBC policy. On-site amenity greenspace should generally be provided largely as one principal park providing a focal point for the development.

- The proposed location for the play area is not deemed acceptable. The location lacks natural surveillance and is sited too close to units no. 22, 26,27,39 and 38. Which could lead to tensions between residents using the park and neighbouring properties.

## **Planning Policy**

### Final Comments (updated 27<sup>th</sup> January 2026)

#### Policy Status

The Local Plan (Core Strategy) and the Local Plan (Allocations), together with the Hampshire Minerals and Waste Plan, provide the development plan for the borough.

Consultation on a full Draft (Regulation 18) Local Plan concluded on 1 July 2025 which may only be afforded very limited weight at this stage.

The following Adopted Local Plan policies are of particular relevance:

- CS9 – Housing
- CS16 – High Quality Design
- CS13 – Green Infrastructure
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS21 – Developer Requirements
- DM1 – Recreation and Open Space
- DM10 – Pollution
- DM13 – Car and Cycle Parking in Residential Development
- DM24 – Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- AL1 – Presumption in Favour of Sustainable Development
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- LP1 Leigh Park Housing Allocations (Sites) o L145 SSE Offices Site, Bartons Road

### Principle of development

The site lies within the urban area as defined by policies CS17 and AL2 in the context of the adopted local plan. In addition, the site is allocated for 90 dwellings under site reference L145 in Policy LP1 of the Allocations Plan. There is therefore a presumption in favour of sustainable development subject to other considerations including various site-specific development requirements set out within the allocation.

Paragraph 125 of the 2024 National Planning Policy Framework indicates that planning policies and decisions should give substantial weight to the value of using

suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused.

It is also noted that the Draft Building a Better Future Plan proposes to retain the site as an allocation (reference 18, SHELAA LP07) for an indicative yield of 90 dwellings. In addition, the site is located within an identified opportunity area for high density development as proposed to be defined by the Draft Building a Better Future Plan. As such, a high-density scheme would be supported in principle.

#### Development Requirements

Both site allocation policies set out development requirements which should be considered during the determination of this application. In addition, commentary on some key issues is offered below.

#### Affordable housing:

Policy CS9 of the Adopted Local Plan seeks to deliver on average 30-40% affordable housing on sites of 15 dwellings (gross) or more. Of the 90 dwellings, 45 dwellings would be provided as either affordable or social rent and shared ownership, equivalent to 50% which would exceed the amount required by policy. This is supported by paragraph 4.329 of the Draft Local Plan which notes a greater proportion of affordable housing than that required by planning policy will be supported in principle.

The Council's Housing Manager will be able to provide further advice in terms of the type and tenure of affordable housing that should be provided.

#### Housing mix:

Core Strategy Policy CS9 indicates that housing proposals should provide a mix of dwelling types, sizes and tenures which help meet identified housing need and contribute to the development of mixed and sustainable communities.

The table in the Addendum to the Planning Statement provides analysis of the submitted housing mix versus the estimated size of housing required in the Council's Housing Needs Analysis 2023:

| 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%        |

The submitted layout includes a mix of dwelling types from one- and two-bedroom flats and two, three and four bed houses, a proportion of the latter would be provided as affordable. No private flats are proposed. Overall, the scheme would achieve a slightly greater proportion of 1 bed and 2 bed, and a smaller proportion of 3 and 4 bed when compared against the Council's Housing Needs Analysis.

### Housing density:

The Draft Building a Better Future Plan identifies most of the site as falling within one of the opportunity areas (as defined by Policy 13) to achieve a minimum density of 55 dph net. Based on the Net Developable Area Plan Drawing Reference 6087-1120 Rev B, the site has a net developable area of 1.497 ha which would result in a net density of just over 60 dwellings per annum. This is supported by policy and is considered to make efficient use of land in line with NPPF objectives.

### Amenity & Pollution:

Site allocation L145 notes the potential air quality/noise issues due to the proximity of Petersfield Road, and Havant and Waterlooville football stadium to the east. The abutment of the SSE Data Recovery and energy centre block is also noted. Environmental Health have provided separate comments on these matters.

### Parking

The minimum car parking standards would apply in accordance with Tables 4A and 4B of the Parking SPD and Policy DM13.

Based on the accommodation schedule provided in Table 5, the proposed development would generate a requirement for 169 allocated spaces:

| Size of Housing | No of Units | Minimum Car Parking Requirement | Number of Car Parking Spaces Required |
|-----------------|-------------|---------------------------------|---------------------------------------|
| 1 bed           | 11          | 1 space                         | 11 spaces                             |
| 2 bed           | 32          | 2 spaces                        | 66 spaces                             |
| 3 bed           | 36          | 2 spaces                        | 72 spaces                             |
| 4 + bed         | 10          | 3 spaces                        | 30 spaces                             |
| <b>TOTAL</b>    | <b>185</b>  |                                 | <b>179 spaces</b>                     |

An additional 20% of unallocated visitor parking should be accommodated which would equate to 36 spaces (when rounded). This would result in an overall requirement for 215 parking spaces (rounded).

The Transport Assessment Addendum indicates that the proposed development will provide a total of 147 resident spaces and 30 visitor spaces. Justification is provided at Appendix F which examines 2011 Census data and indicates that based on average car ownership of 0.84 vehicles per household, then the proposed development would result in an estimated demand for 76 vehicles, and 76 resident parking spaces would be sufficient.

In addition, it is noted that the proposed development is located within convenient walking and cycling distance of local amenities and is within 150m of bus stops located on Martin Road. Indeed, the site is located within one of the Borough's core opportunity areas as defined by the Council's Residential Density Evidence Base Paper, due to its proximity to services and facilities and access to public transport. As such it is considered that the level of parking is appropriate to the location of the development.

### Five year housing land supply

The Council's Five Year Housing Land Supply Update (December 2026) indicates the Council has 1.3 years supply with a 20% buffer applied. This is below the five year supply threshold, and as such there is normally a presumption in favour of sustainable development (para 11d of the NPPF). The tilted balance means that permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

#### Conclusions:

The principle of the development of this site is acceptable in principle subject to other material considerations. The site is located within an opportunity area for high density development, due to its proximity to services and facilities and access to public transport. The scheme would be in line with these objectives.

Furthermore, the Council is not currently able to demonstrate an up-to-date five-year housing land supply position. In the context of the tilted balance, permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Original Comments 25<sup>th</sup> September 25

#### Policy Status

The Local Plan (Core Strategy) and the Local Plan (Allocations), together with the Hampshire Minerals and Waste Plan, provide the development plan for the borough.

Consultation on a full Draft (Regulation 18) Local Plan concluded on 1 July 2025 which may only be afforded very limited weight at this stage.

The following Adopted Local Plan policies are of particular relevance:

- CS9 – Housing
- CS16 – High Quality Design
- CS13 – Green Infrastructure
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS21 – Developer Requirements
- DM1 – Recreation and Open Space
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- AL1 – Presumption in Favour of Sustainable Development
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- LP1 Leigh Park Housing Allocations (Sites)
  - o L145 SSE Offices Site, Bartons Road

#### Principle of development

The site lies within the urban area as defined by policies CS17 and AL2 in the context of the adopted local plan. In addition, the site is allocated for 90 dwellings under site reference L145 in Policy LP1 of the Allocations Plan. There is therefore a presumption in favour of sustainable development subject to other considerations including various site specific development requirements set out within the allocation.

Paragraph 125 of the 2024 National Planning Policy Framework indicates that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused.

It is also noted that the Draft Building a Better Future Plan proposes to retain the site as an allocation (reference 18, SHELAA LP07) for an indicative yield of 90 dwellings.

### Development Requirements

Both site allocation policies set out development requirements which should be considered during the determination of this application. In addition, commentary on some key issues is offered below.

### Affordable housing:

Policy CS9 of the Adopted Local Plan seeks to deliver on average 30-40% affordable housing on sites of 15 dwellings (gross) or more. Of the 91 dwellings, 46 dwellings would be provided as either affordable or social rent and shared ownership, equivalent to 51% which would exceed the amount required by policy. This is supported by paragraph 4.329 of the Draft Local Plan which notes a greater proportion of affordable housing than that required by planning policy will be supported in principle.

The Council's Housing Manager will be able to provide further advice in terms of the type and tenure of affordable housing that should be provided.

### Housing mix:

Core Strategy Policy CS9 indicates that housing proposals should provide a mix of dwelling types, sizes and tenures which help meet identified housing need and contribute to the development of mixed and sustainable communities.

The table under paragraph 8.16 of the submitted Planning Statement provides analysis of the submitted housing mix versus the estimated size of housing required in the Council's Housing Needs Analysis 2023:

| 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           |          |

The submitted layout includes a mix of dwelling types from one- and two-bedroom flats and two, three and four bed houses, a proportion of the latter would be provided as affordable. It is noted that no private flats are proposed. Overall, the scheme would achieve a slightly greater proportion of 1 bed and 2 bed, and a smaller

proportion of 3 and 4 bed when compared against the Council's Housing Needs Analysis.

#### Housing density:

The Draft Building a Better Future Plan identifies most of the site as falling within one of the opportunity areas (as defined by Policy 13) to achieve a minimum density of 55 dph net. The submitted Planning Statement indicates the site would have a net developable area of 56.96 dwellings per hectare (though does not appear to be supported by any site analysis of the sites opportunities and constraints to provide an audit trail to show how the net developable area was reached). Nevertheless, the proposed development yield is consistent with the site's allocation and is considered to make an efficient use of land in line with NPPF objectives.

#### Amenity & Pollution:

Site allocation L145 notes the potential air quality/noise issues due to the proximity of Petersfield Road, and Havant and Waterlooville football stadium to the east. The abutment of the SSE Data Recovery and energy centre block is also noted. Given the potential for the occupiers to be affected by these sources, it is recommended that the views of the Environmental Health Team are sought.

#### Parking

The minimum car parking standards would apply in accordance with Tables 4A and 4B of the Parking SPD and Policy DM13.

Based on the accommodation schedule provided in Table 5, the proposed development would generate a requirement for 179 allocated spaces:

| Size of Housing | No of Units | Minimum Car Parking Requirement | Number of Car Parking Spaces Required |
|-----------------|-------------|---------------------------------|---------------------------------------|
| 1 bed           | 11          | 1 space                         | 11 spaces                             |
| 2 bed           | 30          | 2 spaces                        | 60 spaces                             |
| 3 bed           | 39          | 2 spaces                        | 78 spaces                             |
| 4+ bed          | 10          | 3 spaces                        | 30 spaces                             |
| <b>TOTAL</b>    | <b>185</b>  |                                 | <b>179 Spaces</b>                     |

An additional 20% of unallocated visitor parking should be accommodated which would equate to 36 spaces. This would result in an overall requirement for 215 parking spaces.

When compared to the proposed total of 151 spaces and 30 visitor spaces, there would be under provision of 28 resident parking spaces and 6 visitor parking spaces. Whilst it is noted that all flats are proposed as affordable rent, in addition to a number of houses, Note 2 under Table 4A of the Parking SPD indicates reductions will only be considered for rented properties where there is evidence that the tenure is unlikely to change or the developers can demonstrate that lower standards would be appropriate. It is also noted that the applicant emphasises the promotion of public transport, and that in the context of achieving a higher density that it may not be possible to achieve the full level of parking provision across the site.

It is noted that the development would not secure standards in accordance with the Parking SPD which would conflict with Policy DM13. However, any harm should be

carefully weighed against the Council's objectives in the emerging Local Plan to optimise the use of land in order to meet as much housing need as possible. Five year housing land supply The Council's

#### Five Year Housing Land Supply

Update (March 2025) indicates the Council has 1.81 years supply with a 20% buffer applied. This is below the five year supply threshold, and as such there is normally a presumption in favour of sustainable development (para 11d of the NPPF). The tilted balance means that permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

#### Conclusions:

The principle of the development of this site is acceptable in principle subject to other material considerations. It is noted that the development would not provide sufficient resident or visitor parking and therefore result in a conflict with Policy DM13 and the Parking SPD. However, this should be carefully weighed against the Council's objectives in the emerging Local Plan to optimise the use of land to meet as much housing need as possible.

Furthermore, the Council is not currently able to demonstrate an up-to-date five-year housing land supply position. In the context of the tilted balance, permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

### **Portsmouth Water**

Final Comments 17<sup>th</sup> December 25

#### Portsmouth Water's Position

Portsmouth Water have no objections in principle to the proposed development. We wish to be further consulted on further details provided in accordance with the below conditions.

#### Commentary

We have reviewed the Flood Risk & Drainage Addendum prepared by XXX on XXX and acknowledge Southern Water's position that the existing sewerage network does not have sufficient capacity to accommodate flows from the site. Portsmouth Water

The discharge of surface water to the off-site surface water sewer is considered viable, provided an appropriate sustainable drainage solution is implemented. Portsmouth Water raises no objection to this approach and considers that it can be secured through a suitably worded planning condition. The proposed condition is set out below, along with a reiteration of Portsmouth Water's other recommended conditions.

#### Condition – Surface Water Drainage Strategy

*No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the*

*hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied. Details of how the scheme shall be maintained and managed after completion shall also be included.*

**Reason** - *To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site.*

#### Condition – Foul Water Drainage Strategy

*No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.*

*The scheme shall also include:*

- details of how the scheme shall be maintained and managed after completion.*
- details of the sewage pipe work layout and specifications.*

**Reason** - *This is in order to manage the quantity of foul sewage and protect water resources.. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.*

#### Condition - Piling and foundation designs

No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

**Reason** - Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways.

*Thus, it should be demonstrated that any proposed piling;*

- a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.*
- b. Nor any increased risk to drinking water supplies (including turbidity).*
- c. Nor deterioration in the transmissivity of the aquifer*

#### Condition - Land Contamination

*If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with Portsmouth Water) shall be undertaken in that phase until the*

*developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.*

**Reason** - *To ensure that risks from land contamination to drinking water supplies are remediated.*

#### Condition - Construction and Environmental Management Plan (CEMP)

*No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.*

**Reason-** *Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local public water supply source.*

#### Informatives

Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.

For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the standard Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings.

Original Comments 8<sup>th</sup> October 25

#### Site Setting

The site is situated on the Bognor Sand Member bedrock with no mapped superficial deposits within the site boundary. The proposed development is situated in a sensitive groundwater catchment, within Source Protection Zone 1c (SPZ1c) for the Havant and Bedhampton Springs catchment, a vital public water supply source, providing water to the city of Portsmouth and the surrounding area. The SPZ1c is at risk from subsurface activity, where the Chalk aquifer is confined and may be impacted by deep drilling activities. Subterranean activities such as infiltration drainage solutions, site investigation boreholes and/or piling may pose a risk to groundwater quality and the springs. Consequently, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

#### Portsmouth Water's Position

The proposed works are situated in a sensitive groundwater catchment and there are potentially significant risks associated with groundworks in this area. Portsmouth Water has no objection in principle to the proposed development. However, due to the sensitivity of the groundwater environment we request that the following planning conditions be attached to any planning permission granted, information to be submitted to and approved in writing by the Local Planning Authority, in consultation with Portsmouth Water.

### Conditions

#### Surface Water Drainage Strategy- Condition 1

*No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.*

*Details of how the scheme shall be maintained and managed after completion shall also be included.*

**Reason** - *To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site.*

Note: Portsmouth Water has a presumption against the use of deep-bore soakaways at this location due to the sensitivity of the groundwater environment at this location.

#### Foul Water Drainage Strategy – Condition 2

*No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.*

*The scheme shall also include:*

- *details of how the scheme shall be maintained and managed after completion.*
- *details of the sewage pipe work layout and specifications.*

**Reason** - *This is in order to manage the quantity of foul sewage and protect water resources.. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.*

#### Piling and Foundation Designs – Condition 3

*No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.*

*Reason - Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways.*

*Thus, it should be demonstrated that any proposed piling;*

- a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.*
- b. Nor any increased risk to drinking water supplies (including turbidity).*
- c. Nor deterioration in the transmissivity of the aquifer*

#### Land Contamination – Condition 4

*If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.*

*Reason - To ensure that risks from land contamination to drinking water supplies are remediated.*

#### Construction and Environmental Management Plan (CEMP) – Condition 5

*No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.*

*Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local public water supply source.*

#### Informatives

Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.

For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the standard Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings

## Commentary

### Surface Water Drainage

Infiltration tests have been undertaken for this application. Results conclude infiltration is unlikely to be a viable option. The drainage strategy therefore proposes to discharge surface water into the existing surface water sewer in the south eastern corner of the site. Proposed treatment is in accordance with CIRCA SuDS Manual C753 for pollution hazard indices.

### Utilities Planning Statement

The report prepared by Technical & Development Services for Stonebond Properties Guildford Ltd dated 27th July 2025 states within Section 3 'Water Infrastructure' that Southern Water is the potable water supplier for the area. This is incorrect, Portsmouth Water is the potable supplier. Preliminary treatment proposals are a mixture of surface water attenuation measures (noninfiltration) permeable paving with no infiltration to ground and underground geocellular attenuation crates.

This is acceptable in principal to Portsmouth Water from a groundwater quality perspective. We agree that the foul and surface water drainage will need to be assessed in detail. Therefore we request to be consulted on the detailed drainage plans once these are made available in accordance with condition 1. Information to be submitted to and approved in writing by the Local Planning Authority, in consultation with Portsmouth Water.

### Piling and Foundation Designs

Portsmouth Water support proposals for traditional footing and floor slabs foundations. If, following further intrusive investigations piling is proposed, we request this is accompanied by a Piling Method Statement, detailing the piling type and depths. We request to be consulted on the Piling Method Statement in accordance with condition 3.

### Land Contamination

Investigations have concluded there is no unacceptable contamination risks to water quality.

### Portsmouth Water – Line Search Comments 28<sup>th</sup> October 25

Please find attached the plan(s) showing the approximate position of water mains at the requested location.

Service connections are not shown but it should be assumed that all premises are supplied from the water distribution network. Other connections not related to properties, such as field supplies, may also exist so we would suggest a visual/CAT scan/Ground Radar survey is undertaken prior to any hand or mechanical excavation.

Safe digging practices in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site before any mechanical

plant is used. This documentation is available at  
<http://www.hse.gov.uk/pubns/priced/hsg47.pdf>

Copies of guidance notes: Working near distribution apparatus and Guidance for working near or over a Trunk Water Main are enclosed. Please read carefully as the conditions will apply to any work you undertake in the vicinity of Portsmouth Water assets.

It is important to ensure that a copy of the above guidance is provided to those undertaking any work which may affect our apparatus.

Please note Portsmouth water has no responsibility for any underground drainage or sewerage infrastructure. Enquiries regarding these assets should be directed to the relevant authority/company.

Original Comments Line Search (Wrong site) 4<sup>th</sup> September 25

Please find attached the plan(s) showing the approximate position of water mains at the requested location.

Service connections are not shown but it should be assumed that all premises are supplied from the water distribution network. Other connections not related to properties, such as field supplies, may also exist so we would suggest a visual/CAT scan/Ground Radar survey is undertaken prior to any hand or mechanical excavation.

Safe digging practices in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site before any mechanical plant is used. This documentation is available at  
<http://www.hse.gov.uk/pubns/priced/hsg47.pdf>

Copies of guidance notes: Working near distribution apparatus and Guidance for working near or over a Trunk Water Main are enclosed. Please read carefully as the conditions will apply to any work you undertake in the vicinity of Portsmouth Water assets.

It is important to ensure that a copy of the above guidance is provided to those undertaking any work which may affect our apparatus.

Please note Portsmouth water has no responsibility for any underground drainage or sewerage infrastructure. Enquiries regarding these assets should be directed to the relevant authority/company.

**Scottish & Southern Electric** Line search 4<sup>th</sup> September 25 (Wrong site)

We have sent you the plans of our network records within the area requested. You will shortly receive responses each of the following; any High Voltage Mains cables and Low Voltage Mains cables.

Attached to this email is the 'Guide to Interpreting' which includes the legends for the plans on pages 7-9.

If a Service Cable is not shown on our maps sent, and you require the Cable to be Traced, please contact the General Enquiries Department on 0800 048 3516 (option 3) or via email, [ge@ssen.co.uk](mailto:ge@ssen.co.uk)

## **Southern Water**

### Final Comments (4<sup>th</sup> Feb 26):

Southern Water has no objection to the direct surface water connection into the surface sewer at a lower restricted rate than previously arranged. The developer will need to submit an S106 application and demonstrate that the proposal provides a betterment to the network.

### Further Comments: (18<sup>th</sup> Nov 25)

Further to our letter dated 22 September 2025, we would like to provide additional clarification regarding network capacity.

At present, Southern Water has capacity for 51 units. However, please note that a sewer connection cannot be refused on the grounds of capacity constraints. Under the Water Industry Act 1991, the statutory mechanism for delivering our duties is via a Section 106 (S106) application.

This development will discharge into the 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 (WTW).

Southern Water will continue to work collaboratively with the developer to align build-out rates with reinforcement planning, ensuring capacity improvements are delivered in a timely manner.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119) Website: [southernwater.co.uk](https://southernwater.co.uk) or by email at: [SouthernWaterPlanning@southernwater.co.uk](mailto:SouthernWaterPlanning@southernwater.co.uk)

### Original Comments: 22<sup>nd</sup> September 25

### Development Site is not within Southern Water's Supply Area

The development site is not located within Southern Water's statutory area for water supply drainage services. Please contact Portsmouth Water who are the relevant statutory undertaker.

### Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers"

([https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1\\_nwm.pdf](https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf)) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approveddocuments/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

### Condition

In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

#### Inadequate capacity in the foul network - 51 units and over (current modelling process (2 part))

Network Capacity refers to the available capacity in our underground assets that carry wastewater to Waste Water Treatment Works (WWTWs). This includes a range of pipe sizes and material types, Wastewater Pumping Stations (WPS) and supporting infrastructure. Some capacity issues may be addressed with operational changes, others may require physical works on our assets. We may identify where several developments would benefit from a larger network reinforcement programme to serve them all where significant growth is taking place in close proximity.

Part of our evaluation looks at the risk of flooding incidents arising from the additional flow of material in terms of 'hydraulic overload'. This means we consider whether there is enough room in the pipes for the likely maximum flow from the connection itself. This assessment does not include random events such as ingress of water from broken pipes, changes in flow arising from blockages or unidentified additional flows from misconnections, these are dealt with through other processes outside of our asset growth planning team as they are operational incidents.

Network Capacity is independent of capacity at the WWTW and growth is planned in a different way though in some cases we may have parallel projects to both reinforce both the network and upgrade the treatment works but this is often not required.

For full details of our connection charging arrangement visit: Connection charging arrangements ([southernwater.co.uk](https://southernwater.co.uk))

Southern Water has undertaken a capacity check of the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network.

#### Condition

Southern Water hence requests the following condition to be applied: Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development.

**Officer Comment:** *Given the separate requirements to enter connection agreements with Southern Water and the more recent clarification 18<sup>th</sup> November 2025 this condition is not recommended to be imposed.*

#### Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance [www.water.org.uk/sewerage-sector-guidance-approved-documents/](https://www.water.org.uk/sewerage-sector-guidance-approved-documents/).

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>  
<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>  
<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991.

#### S106 Connection application

Any new connections to the public sewerage system will require a Section 106 connection application to be submitted and approved by Southern Water Services. Please note that, where there are separate systems available Southern Water will not allow surface water to connect into the public foul sewer. If this is not possible, please provide evidence that all other options have been explored.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119) Website: [southernwater.co.uk](https://www.southernwater.co.uk) or by email at: [SouthernWaterPlanning@southernwater.co.uk](mailto:SouthernWaterPlanning@southernwater.co.uk)

#### **ESP Utilities**

4<sup>th</sup> September 25 (wrong site)

We can confirm that ESP Utilities Group Ltd (ESP) may have water, gas and electric assets within the vicinity of your search.

Please refer to the attached plan(s) showing the approximate position of our apparatus.

**WARNING: When working in the vicinity of ESP Utilities Group Ltd's assets you have a legal Duty of Care that must be observed.**

As your plans for the proposed work develop you are required to keep ESP regularly updated about the extent and nature of your proposed works in order for us to fully establish whether any additional precautionary or diversionary works are necessary to protect our gas & electric network.

Safe digging practices, in accordance with HSE publication HSG47 "Avoiding danger from underground services" must be used to verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all relevant people (direct labour or contractors) working for you.

Arrangements can be set in place so that one of our representatives can meet on site (date to be agreed) and we will be happy to discuss the impact of your proposals on the gas network once we have received the details.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

## **Southern Gas**

### Further Comments 16<sup>th</sup> December 26

Although SGN has a high pressure gas pipeline in the vicinity, the safety and integrity of our assets will not be affected by the proposal. However, should your proposal change please contact us immediately and we will re-assess.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence.

1. No mechanical excavation is allowed within 3 metres either side of pipeline.
2. No plant or storage of equipment shall be made within any easement strip.
3. If any metallic pipes or cables are being laid in proximity to gas pipelines then interference testing will be required, the cost of which to be borne by the promoter of the works. A minimum clearance of 600mm is required.
4. All precautions stated in publication SGN/WI/SW/2 (Safe Working in the Vicinity of High Pressure Gas Pipelines) shall be fully complied with in all respects. Acceptance of SGN/WI/SW/2 shall be acknowledged by the responsible site person signing and returning the form Appendix A (back page) to the SGN representative contacted in (7).
5. No thrust boring shall take place within 3 meters of the pipeline.
6. All planting within the easement strip should comply with 'Notes for Guidance on Tree Proximity'.
7. Before commencing work on site you must contact our Pipeline Maintenance Section on the number above at least seven days before work commences. A Southern Gas Networks representative will then contact you to arrange to visit site. Details of working near to highpressure gas pipelines can then be discussed.

8. Pipeline sections that are planned and agreed by SGN to be permanently covered (i.e. by road surface) will require a coating survey. SGN will repair any indicated coating defects free of charge. The survey costs will be borne by the promoter of the works. Prior to any surface cover cathodic protection coupons and reference cells will require installation at no cost to SGN.

9. This pipeline is cathodically protected and as such has test cables located in test posts, were these to be lost through this work we would look to you for remedial action at no cost to SGN.

10. Intrusive construction methods will require an agreed method statement prior to work starting.

11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.

12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or boreholing must take place within 3 metres of the pipeline.

Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.

Please let me know if SGN can supply you with technical or other information that may be of assistance to you in determination of the application.

Further Comments: uploaded 1<sup>st</sup> December 25

With regards to the following applications, SGN has no objection, the works a far enough away to not affect our assets.

Further Comments 7<sup>th</sup> Nov 25

Although SGN has a high pressure gas pipeline in the vicinity, the safety and integrity of our assets will not be affected by the proposal. However, should your proposal change please contact us immediately and we will re-assess.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence.

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10. Intrusive construction methods will require an agreed method statement prior to work starting.

11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.

12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or boreholing must take place within 3 metres of the pipeline.

Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.

Further Comments: 28<sup>th</sup> October 25

#### Line search Response

Please find an extract from our mains records for your proposed work area, any SGN assets are described in the map legend. On some occasions blank maps may be sent to you, this is due to your proposed work being in a no gas area but within our operational boundaries.

This mains record only shows the pipes owned by SGN in our role as a Licensed Gas Transporter (GT). Please note that privately owned gas pipes or pipes owned by other GTs may be present in this area and information regarding those pipes needs to be requested from the owners. If we know of any other pipes in the area we will note them on the plans as a shaded area and/or a series of x's.

The information shown on this plan is given without obligation or warranty and the accuracy cannot be guaranteed. Service pipes, valves, siphons, stub connections etc. are not shown but their presence should be anticipated. Your attention is drawn to the information and disclaimer on these plans. The information included on the plan is only valid for 28 days.

On the mains record you may see the low/medium/intermediate pressure gas main near your site. There should be no mechanical excavations taking place above or within 0.5m of a low/medium pressure system or above or within 3.0m of an intermediate pressure system. You should, where required confirm the position using hand dug trial holes.

A colour copy of these plans and the gas safety advice booklet enclosed should be passed to the senior person on site in order to prevent damage to our plant and potential direct or consequential costs to your organisation.

Safe digging practices in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site before any mechanical

plant is used. It is your responsibility to ensure that this information is provided to all relevant people (direct labour or contractors) working for you on or near gas pipes.

It must be stressed that both direct and consequential damage to gas plant can be dangerous for your employees and the general public and repairs to any such damage will incur a charge to you or the organisation carrying out work on your behalf. Your works should be carried out in such a manner that we are able to gain access to our apparatus throughout the duration of your operations.

#### Original Comments Line Search 4<sup>th</sup> September 25 (Wrong site)

Please find an extract from our mains records for your proposed work area, any SGN assets are described in the map legend. On some occasions blank maps may be sent to you, this is due to your proposed work being in a no gas area but within our operational boundaries.

This mains record only shows the pipes owned by SGN in our role as a Licensed Gas Transporter (GT). Please note that privately owned gas pipes or pipes owned by other GTs may be present in this area and information regarding those pipes needs to be requested from the owners. If we know of any other pipes in the area we will note them on the plans as a shaded area and/or a series of x's.

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A colour copy of these plans and the gas safety advice booklet enclosed should be passed to the senior person on site in order to prevent damage to our plant and potential direct or consequential costs to your organisation.

Safe digging practices in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all relevant people (direct labour or contractors) working for you on or near gas pipes.

It must be stressed that both direct and consequential damage to gas plant can be dangerous for your employees and the general public and repairs to any such damage will incur a charge to you or the organisation carrying out work on your behalf. Your works should be carried out in such a manner that we are able to gain access to our apparatus throughout the duration of your operations.

## **6. Publicity and Community Involvement**

This application was publicised in accordance with the Council's Local Code of Corporate Governance and the Statement of Community Involvement.

| Publicity Type | Publicity Details   | Start Date | End Date   | Reasons                                       |
|----------------|---------------------|------------|------------|-----------------------------------------------|
| Press Advert   |                     | 26/09/2025 | 17/10/2025 | Major Development as defined by the DMPO 2015 |
| Site Notice    | Site Notice 8.10.25 | 08/10/2025 | 29/10/2025 | Major Development as defined by the DMPO 2015 |

Neighbouring properties consulted (as defined by the Statement of Community Involvement)

Number consulted: 104

3 Neutral (including Havant Climate Alliance and Havant Friends of the Earth)

**Neutral Comments:**

Question in relation to access onto Martins Road and potential impact on junction to St Albans Road.

A great improvement over the previous proposal, submitted in October 2020 and rejected by the planning committee in November 2022.

Suggested materials are unimaginative; why not use contrasting brick colours to enable the otherwise 'ordinary' structures to stand out from the other residential blocks in this northern part of the town centre?

No indication in the document detail and roof plans that the architect proposes that sustainable heating systems and solar power generation is used in the construction. While the floor layouts of the individual houses appear well considered, the housing layout is still rather conservative. Surely we shouldn't be building twentieth century semi-detached properties in the twenty first century?

Comments on behalf of Havant Climate Alliance and Havant Friends of the Earth

We broadly support the latest proposals to build 90 dwellings on this brownfield site which has been empty for too long. This is an improvement on the previous application rejected in 2022, as no fast food restaurant is proposed, and this scheme includes affordable homes. At 1.5 miles from Havant Town Centre and closer to Leigh Park, it has good connectivity to local shops, schools and transport networks. Our stance is Neutral in view of several concerns raised below.

**HOUSING NEED**

The developer refers to 50% of homes being affordable which is more than HBC's stated requirement. However given the high level of need, with over 1,500 households

on the Hampshire Home Choice waiting list, one would like a commitment to 50% to be maintained, with a higher percentage of those homes being for social rent. This should also include some 3 bed homes.

## BUILDING MATERIALS

We support the proposal to use renewable building materials, manage construction waste and reuse waste materials i.e. applying the circular economy to reduce embodied carbon.

## HEATING

We agree that homes should have high levels of insulation, with thermal mass, prevention of thermal bridging and high quality double glazing. Developers propose air source heat pumps, with domestic hot water heat pumps. They do not recommend ground source heat pumps as they state that they are more expensive to install and “need energy to pump water round the pipework”. However the Energy Saving trust states that GSHPs are more efficient than ASHPs, with lower running costs for residents and lower CO2 emissions, although they are more expensive to install. However if GSHPs were installed during the construction of the development, their cost would be reduced. Ground source heat pumps could also be used to power a district heating system.

The “Energy and Sustainability statement” notes that the developer reserves the right to make alterations to the final detailed design which may include a change of heating strategy to gas boilers instead of ASHPs. However in this case they would supplement with Solar PV panels. They say this will still result in 65% reduction in CO2 overall. We do not think it is acceptable for any more fossil fuel (gas) heaters to be installed in new homes, which is also against the Future Homes Standard 2025.

Why not install solar PV panels and batteries, as well as heat pumps to make an even greater saving on household bills for residents, and a greater reduction in CO2 ? They should also consider the possibility of houses having roofs positioned so that they can maximise potential for solar panels.

## COOLING AND VENTILATION

The developers propose solar control glass as a means of controlling overheating. This is a good idea for windows facing south, south west and south-east. External blinds or awnings, might also be necessary.

The positioning of deciduous trees could be considered as a means of shading windows during the summer months.

Residents should be able to open windows to provide fresh air, when they want it. Where noise is an issue, trickle ventilation systems would be preferred to mechanical ventilation, which would increase electricity/carbon use. Continually running decentralised extractor fans are also proposed for wet rooms and kitchens. These are said to be very energy efficient, but careful assessment is needed of whether these will use less energy and carbon than other options.

## NOISE

Although the loudest noise will come from the football ground, this is only occasional, and the noise assessment indicates that the greatest disturbance will come from traffic noise on Petersfield and Bartons Roads.

We agree that windows in properties most effected, should either have the highest standard of double glazing, or triple glazing.

We think that mechanical ventilation should be avoided in favour of trickle ventilation, to reduce CO2 emissions. Acoustic screening will be needed for some gardens.

A thick barrier of trees planted along the west and north sides of the development should also be planted to reduce noise.

## AIR POLLUTION

The air quality assessment takes the position that there are no significant issues for this development, although there is a debate about whether current UK standards are sufficient to fully protect health. The assessment recognises that Petersfield Road is the greatest source of air pollution in the vicinity, so that the proposal for a thick belt of trees to reduce noise on that side, and along Bartons Road, would also help to reduce pollution from traffic.

## POTABLE WATER

We support consumption being limited to 110 litres per person per day.

Grey water recovery and use of water butts would also help to reduce water consumption.

We note Portsmouth Water's concern that the site is on a Source Protection Zone 1c area.

Any risk to the quality of water arriving at Bedhampton Springs must be avoided, and advice from Portsmouth Water closely adhered to in construction and plans to deal with surface water.

## SEWAGE

Southern Water states that there is inadequate capacity in the foul network, so that occupancy must be phased. In view of incidents of sewage overflows and storm water polluting our harbours, this needs more investigation.

## SUSTAINABLE TRANSPORT

We agree that all homes should have access to EV charge points, and that all, including flats, will have lockable bike sheds.

Pedestrian and cycle routes within the development should link with the cycle route down the east side of Petersfield Road, and to Bartons Road. Improvements to these cycle routes, the crossing from Martin Road to Stockheath Road, and to the Martin Road bus stop, will be beneficial.

## ECOLOGY AND ENVIRONMENT

If a 10% biodiversity net gain cannot be achieved on site, the remaining BNG should be established elsewhere, preferably in the surrounding area. We would support plans to create a mosaic of habitats on the site (beyond what already exists) to add biodiversity. Trees, shrubs and vegetation already provide wildlife corridors around the edges of the site. Rather than removing these and completely replanting, as much as possible should be kept in place with additional planting of native species, to provide wildlife corridors around the entire perimeter. A thick belt of trees along the western and northern boundaries to reduce noise and air pollution, would also enhance the wildlife corridors and landscape. There are positive plans for the maintenance and management of green spaces. Plans for bird nest boxes and bat roosts on houses, plus hibernacula and buried log piles will support biodiversity. Lighting within the site should meet bat friendly standards.

Two objections have been received:

## Objections

Here I present my objections to this development, thank you for considering them.

+ Highway safety and traffic: the proposed site has only one main entrance, the one to Bartons Road, next to the traffic lights, several residential areas, schools, a bike lane, etc. the traffic there is already very high, with traffic jams happening along the day and

even getting chaotic when accidents happen on the A27 and A3 as this road is an alternative route to get to Chichester, Rowlands Castle, Portsmouth, Emsworth, etc. During the construction period there will be big trucks coming in and out making it even more dangerous, and if the site is ever finished there will be approx. 250-300 extra people living there, adding a similar number of vehicles destined to use such already dangerous road and crossroads.

+ Noise, smell and fumes: The noise chart attached within this planning development already shows a high level of noise at the above mentioned exit. The entrance and exit of this development is already a problem, with vehicles constantly using it creating noise, smell and fumes. Adding building trucks and vehicles for 90 dwellings will only increment this problem, plus the issues of exiting and turning at such narrow piece of road.

#### Traffic and access.

The Transport Assessment and five-part evidence set for this scheme estimate trip rates that still translate to several hundred additional daily vehicle movements from 90 dwellings. In practice that will load Bartons Road and the A27 approaches at the morning and evening peaks. The accompanying Travel Plan relies on soft measures such as travel packs and cycle incentives rather than committed public transport upgrades or junction works. That is not a realistic basis for mode shift in West Leigh where most essential trips are currently by car. These documents are the applicant's own evidence: 24-097-RPT-003-A Transport Assessment Parts 1–5 and 24-097-RPT-004-A Travel Plan. They should be read alongside Havant's known east-west congestion on the A27 corridor.

#### Flood risk and drainage.

The Flood Risk Assessment and Drainage Strategy, document 24-097-002 Rev A Parts 1–2, accepts that surface water management is critical on this site. The strategy depends on attenuation and controlled discharge but gives limited certainty on long term adoption and maintenance of SuDS features. If maintenance is not secured, failure routes straight to neighbouring property. The documents also appear to model climate change allowances at levels that are now at the lower end of national guidance, while rainfall intensity is trending upward. West Leigh has experienced surface water issues in recent heavy rain events. New impermeable area here will increase runoff unless design and maintenance are watertight.

#### Air quality and noise.

The Cass Allen Air Quality Constraints and Opportunities Appraisal RP01-24394-R2 concludes negligible effects, and the Noise Assessment RP02-24394-R0 focuses mainly on protecting future occupants from existing road noise. Neither document convincingly addresses the combined effect of the site plus other local growth on queuing, idling, and background levels on Bartons Road and at the A27 junctions. Those cumulative effects will be felt by current residents.

#### Biodiversity and trees.

The Biodiversity Net Gain Assessment R2724\_BNG\_b says the scheme reaches the statutory ten percent net gain. The pathway to that figure is largely through future landscaping rather than retention of mature habitat. Newly planted habitat will take years to establish and is risk-prone. The arboricultural report confirms removals that will break wildlife corridors along hedgerows. If any element of the claimed gain depends on off-site measures, there is no guarantee the ecological benefit occurs in West Leigh where the loss happens.

#### Housing mix and density.

The Design and Access Statement and Schedules of Accommodation show a heavy tilt to larger units. Havant's own policy evidence stresses the importance of genuinely affordable and smaller homes. A high proportion of larger market houses will not meet that need and will increase car dependency. The proposed density is also above the prevailing suburban grain in West Leigh which will intensify overlooking, daylight conflicts, and parking stress.

#### Water and utilities.

Southern Water and Portsmouth Water consultee responses in the file list confirm capacity constraints and the need for network work. Where a scheme is only acceptable "subject to capacity upgrades," there is delivery risk. If the upgrades slip, occupation can precede capacity, with impacts borne by existing customers.

#### Schools and pupils.

The development will draw families to West Leigh and increase demand for places at nearby schools. Using the site postcode PO9 5NA, the nearest primary schools are Sharps Copse Primary and Nursery School at approximately 690 yards, St Alban's Church of England Aided Primary School at about 0.6 miles, and Front Lawn Primary Academy at about 0.8 miles. These distances are published in independent postcode profiling for PO9 5NA.

#### StreetCheck

Capacity data show the local system is already tight in places. Sharps Copse Primary has a stated capacity of 315 with 293 pupils on roll, which leaves only a narrow margin and can fluctuate year to year.

- St Alban's C of E Aided Primary lists a capacity of 222 places on its Ofsted record, reflecting a small one-form-entry school that fills quickly from its catchment.

- Front Lawn Primary Academy has a capacity of 420 but 440 pupils on roll on its government register, which indicates it is operating at or above capacity.

For secondary, Havant Academy has capacity for 700 with 534 pupils, Warblington School has capacity 900 with 758 pupils, and Park Community School has capacity 950 with 988 pupils on roll. These are the current figures on Ofsted and the government's The Park Community School figure shows the secondary network already operating above stated capacity in places.

Hampshire County Council's School Places Plan confirms the statutory duty to provide sufficient places and sets out where extra places are already required over 2025 to 2029. The plan captures pressure points and programmed expansions across the county and recognises the need to match new housing growth with timely, funded school capacity. The County's Infrastructure Delivery Plan used by Havant Borough makes the same link between housing and timely education provision. These are the benchmarks the Bartons Road proposal should be tested against.

Applying average household size and typical child yield for mixed housing suggests this scheme could generate dozens of additional primary and secondary pupils. The developer's education impact should therefore be explicit, quantified, and linked to secured contributions and delivery timings. Neither the Design and Access Statement nor the transport and utilities documents provide the necessary certainty on education mitigation. Without secured measures, families will either be displaced from local schools or forced into longer cross-town journeys that add traffic at peak times.

#### Cumulative impact.

The application evidence assesses this site largely on its own terms. West Leigh sits within a wider growth corridor, and the A27 junctions and local services are sensitive to

cumulative loading. National policy requires decision-makers to consider developments in combination. A piecemeal approach that discounts cumulative traffic, surface water, school demand, and GP load understates material harm.

#### Deliverability and timing.

Several core mitigations, from drainage adoption to utility upgrades and education capacity, are described as future arrangements or subject to later agreement. Planning permission should not rely on uncertain third-party works or unfunded expansions. Where Park Community School already exceeds stated capacity, and where Front Lawn shows rolls above capacity while St Alban's is a small school with limited headroom, there is no evidence that 90 more homes can be absorbed without timely and enforceable education provision.

#### Conclusion.

The applicant's own submissions acknowledge multiple constraints. Taken together with current, published school capacity and rolls, and with the County's planning for places, the proposal is not yet sustainable. It will increase peak hour congestion on Bartons Road and the A27 approaches, heighten flood risk unless maintenance and climate allowances are strengthened, depress local air quality and amenity through added queuing and activity, reduce mature habitat before replacement is proven, and add pupil demand into a network that already has schools at or over capacity. Unless the scheme is redesigned with binding infrastructure, education, drainage, biodiversity and transport mitigations that are funded, deliverable, and timed before occupation, it should be refused.

Material planning considerations are addressed in Section 7.

## **7 Planning Considerations**

- 7.1 The Council has conducted a Habitats Regulations Assessment (HRA), including Appropriate Assessment (AA), of the proposed development under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). The Council's assessment as competent Authority under those regulations is included in the case file. The screening under Regulation 63(1)(a) found that there was likely to be a significant effect on several Solent European Sites (as defined in the applications HRA) due to both the increase in recreation and the decrease in water quality that would be a result of the proposed development.
- 7.2 The planning application was then subject to Appropriate Assessment under Regulation 63. This included two packages of avoidance and mitigation packages. The first is a package of measures based on the suggested scale of mitigation in the Solent Recreation Mitigation Strategy. The second is a package of measures based on the Position Statement and Mitigation Plan for Nutrient Neutral Development. The applicant has indicated a willingness to enter into a legal agreement to secure the mitigation packages.
- 7.3 The Appropriate Assessment concluded that the avoidance and mitigation packages are sufficient to remove the significant effects on European Sites which would otherwise have been likely to occur. The HRA was subject to consultation with Natural England as the appropriate nature conservation body under Regulation 63(3) who have confirmed that they agree with the findings of the assessment. The applicant has

indicated a willingness to enter into a legal agreement to secure the mitigation packages.

- 7.4 In relation to Recreational Pressure measures will be secured in accordance with the Solent Recreation Mitigation Strategy including a contribution of £78,108.10 (including monitoring and administration fees).
- 7.5 In relation to Water Quality, the Knowle Wetland Mitigation Scheme is proposed as mitigation for the development site. This will be secured through Legal Agreement and the imposition of a Grampian Style condition.
- 7.6 In other respects, having regard to the relevant policies of the development plan and all other material considerations it is considered that the main issues arising from this application are:
- (i) Principle of development
  - (ii) Impact on the character and appearance of the area
  - (iii) Housing Mix and affordable housing
  - (iv) Impact on residential amenity (for existing and future residents)
  - (v) Highway impacts, on site layout and parking
  - (vi) Flood Risks / Drainage
  - (vii) Contamination Issues
  - (viii) Ecological Impacts & BNG
  - (ix) Impacts on Trees
  - (x) Sustainable Development
  - (xi) Infrastructure including CIL / S106 requirements

**(i) Principle of development**

- 7.7 The site lies within the urban area as defined by policies CS17 and AL2 in the context of the adopted local plan. In addition, the site is allocated for 90 dwellings under site reference L145 in Policy LP1 of the Allocations Plan. There is therefore a presumption in favour of sustainable development subject to other considerations including various site specific development requirements set out within the allocation.
- 7.8 The allocation in LP1 identifies the site area as 1.72 ha with a proposed net dwellings figure of 90.

The Site Reference L145 sets out Site Specific Development Requirements as follows, with comments provided in respect of each in relation to this case:

- Employment and Skills Plan to support planning application  
**Officer Comment:** *This will be secured for the construction phase through the associated S106 Agreement.*
- Investigate ground quality conditions, as part of a planning application, and address any matters that arise  
**Officer Comment:** *This discussed at part 7 (vii) below*
- Utilise the existing access point onto Bartons Road  
**Officer Comment:** *This is discussed at part 7 (vi) below and the existing vehicular access point will be used with appropriate alterations.*
- Ensure appropriate amenity level for occupants of proposed residential properties having regard to noise (Policy DM18)  
**Officer Comment:** *This is discussed at part 7 (iv) below*

- Southern Water request connection to the sewerage system at the nearest point of adequate capacity

**Officer Comment:** *This is discussed at part 7 (vi) below*

- Appropriate easement from existing sewage/waste infrastructure

**Officer Comment:** *This is discussed at part 7 (vi) below*

- 7.9 Planning applications that accord with the policies in the adopted local plan should be approved unless material considerations indicate otherwise. The location of the proposed development is in a relatively sustainable urban area with access to amenities in the form of public transport, health provision and retail opportunities and so in principle is considered to be a suitable location for more intensive residential development.
- 7.10 Paragraph 125 of the 2024 National Planning Policy Framework indicates that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused.
- 7.11 It is also noted that the Draft Building a Better Future Plan proposes to retain the site as an allocation (reference 18, SHELAA LP07) for an indicative yield of 90 dwellings.

#### Five-year housing land supply

- 7.12 The Council's Five-Year Housing Land Supply Update (March 2025) indicates the Council has 1.81 years supply with a 20% buffer applied. This is below the five-year supply threshold, and as such there is normally a presumption in favour of sustainable development (para 11d of the NPPF). The tilted balance means that permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.13 In this case the proposal is for 90 dwellings. This net addition of units of accommodation in such a location would make a significant contribution to the Council's overall housing requirements. The proposal is considered to be acceptable in principle constituting sustainable development.

#### **(ii) Impact on the character and appearance of the area**

- 7.14 In terms of the proposed development's impact on the character and appearance of the area, it is necessary to consider the existing context for the development and the characteristics of the site as the starting point for considerations.
- 7.15 The site is considered to be relatively self-contained being bordered to the west by the wide B2149 Petersfield Road, beyond the road are three-storey pitched roof flats and two storey houses, there are also a number of mature trees on the western side of Petersfield Road.
- 7.16 The proposal utilises an existing access to Bartons Road that served the previous Electricity Board site. The development would be set back a minimum of 1.4m from the Road which has a wide side verge such that the set back is approximately 8.6m from the metalled road surface. The units No's 1 and 26-28 would be designed to front Bartons Road and would provide an active street frontage.
- 7.17 To the east are SSE buildings including towards the Martin Road frontage a data building which has an eaves height of approximately 7.7m with a shallow pitched roof to a height of approximately 10.4m above. Havant and Waterlooville Football Club with

stands and ancillary buildings also lies to the east with public open space and West Leigh Skatepark beyond.

- 7.18 To the south is a used car sales garage and MOT/Repair garage. There is a wide verge to Martin Road including trees and then to the south of Martin Road two storey semi-detached houses further to the south.
- 7.19 The context for the proposed development is therefore mixed with business uses, Football Club, residential and open space areas close to the site. The proposed four storey flats would be set well off the nearest existing residential properties, three storey flats to the west of Petersfield Road set approx. 44m off and the two storey houses to the north east in Bartons Road set a minimum of 55m off the proposed flats. The Havant Borough Design Guide SPD requires a set off of 24m to the existing flats and 28m to the existing houses and this far exceeded in the proposed layout.
- 7.20 The proposals provide vehicular access from Bartons Road (as required by the allocation in the Local Plan). The access road would lead south following the eastern side of the site serving semi-detached and terraced housing. From this eastern road a junction would lead west with spurs to north and south. The northern spur would lead to the apartments and other housing, the southern spur to a terrace and parking. The self contained nature of the site is such that a four storey development and housing is considered capable of being accommodated without appearing incongruous in the street scene.
- 7.21 The proposed apartments are proposed in an 'L' shape block which is designed over four floors with brick including feature brick vertical bands. The top floor is recessed to appear as more of a 'penthouse' design incorporating vertical cladding. This helps to reduce the mass and bulk of the top floor from all directions, and assists in mitigating the four storey scale of the development in wider views. The east elevation also includes a further degree of articulation and cladding to lower levels.
- 7.22 The western elevations of the apartments facing Petersfield Road would be set back a minimum of 14m from the roadside pavement. The apartment would include a relatively long elevation to this frontage but the siting of the building set back from the highway would retain a spacious feel to the Petersfield Road site frontage. The apartments would be set back from Bartons Road roadside pavement by a minimum of 18m. There would be a shorter elevation to this frontage. This alignment again retains the spacious setting of the Bartons Road frontage for the tall apartments.
- 7.23 The proposed houses would include semi-detached and terraced development fronting the spine road or set off cul-de-sacs. The layout is generally traditional in appearance with rear amenity space and short frontages often including parking.
- 7.24 The houses do not directly front Petersfield Road and this may lead to a weak site frontage, however this arrangement is similar to existing development in this area in its relationship to the wide Petersfield Road.
- 7.25 To the Martin Road frontage there is a wide verge with some important trees, the residential properties would be set back from this road frontage by approx. 10.5m.
- 7.26 The proposed development includes significant areas of car parking with only limited opportunity for landscaping between runs of spaces. It is acknowledged that this arrangement does not meet the Council's normal landscaping requirements and has been a matter raised with the applicants. Given the amount of parking required to serve the development, discussed further at Section 7(v) below, together with the

density of the scheme and the need for communal open space it is difficult to further soften the character of the parking areas by additional planting. This negative aspect must however be balanced against maximising the use of this brown field site and increasing housing delivery in a scenario where the tilted balance applies. A condition is recommended in relation to hard surfacing materials to seek appropriate treatment of the hard surfaced layout.

- 7.27 A landscaping condition is also recommended to ensure that further tree planting is secured on the development site although this may be limited in the western part of the site by possible restrictions in planting close to the western boundary in the proximity of underground drainage pipes, as reflected in Southern Water's consultation response to the application and their request for a condition to consider this further.
- 7.28 With the landscaping limitations taken into account, it is nevertheless considered that the set back of the taller buildings and their alignment and detailed designs are such as to result in a development with a sense of shared design identity which does not result in harm to the established pattern of development on this rather self contained site surrounded by mixed development types of varying scales.

### **(iii) Housing Mix and affordable housing**

- 7.29 The current allocation in the Havant Borough Local Plan (Allocations) 20114 is for 90 dwellings which is met by the proposed development.
- 7.30 Havant Borough Local Plan (Core Strategy) 2011 policy CS9 (Housing) sets out the adopted policy position and this is considered below:

#### **Affordable Housing**

- 7.31 Policy CS9 of the Adopted Local Plan seeks to deliver on average 30-40% affordable housing on sites of 15 dwellings (gross) or more. Of the 90 dwellings, 45 dwellings would be provided as either affordable or social rent and shared ownership, equivalent to 50% which would exceed the amount required by policy. This is supported by paragraph 4.329 of the Draft Local Plan which notes a greater proportion of affordable housing than that required by planning policy will be supported in principle.
- 7.32 The Council's Housing officer has confirmed that:

*The applicant's proposal for the affordable provision is now 50% (45 units) of the total site, which although above policy requirements, is a welcome addition due to the consistent demand, but severe shortage, of social housing in our area:*

The Affordable Housing mix would be as follows:

| Dwelling type | Tenure                 | Bedrooms | Persons | GIA Area sqm | Number    |
|---------------|------------------------|----------|---------|--------------|-----------|
| Apartment     | Affordable/Social Rent | 1        | 2       | 51.2 av      | 11        |
| Apartment     | Affordable/Social Rent | 2        | 4       | 70.00 av     | 21        |
| House         | Affordable/Social Rent | 4        | 6       | 125.23       | 2         |
| House         | Affordable/Social Rent | 3        | 5       | 98.48        | 2         |
| House         | Shared Ownership       | 2        | 4       | 82.96        | 5         |
| House         | Shared Ownership       | 3        | 5       | 98.38        | 4         |
| <b>TOTAL</b>  |                        |          |         |              | <b>45</b> |

7.34 The Council's Housing Officer confirms:

*The mix of accommodation across the entire site appears to be a satisfactory one with homes of all types and sizes to meet a variety of needs, and I am now satisfied that the affordable provision has been improved sufficiently (including 2 no 3B5P houses for rent), and now provides a mix that would meet the varying demands of our rented waiting list applicants...*

7.35 The affordable housing quantum and type is therefore considered acceptable and a welcome boost to provision in the Borough.

#### Mixed Communities

7.36 Policy CS9 states: Ensure mixed communities are created through the planned distribution and avoidance of a concentration of affordable housing.

Whilst there would be a concentration of the affordable housing provision in the flats, further affordable units would be provided across the site and this approach has been agreed with the Housing team.

#### Housing Mix

7.37 Core Strategy Policy CS9 indicates that housing proposals should provide a mix of dwelling types, sizes and tenures which help meet identified housing need and contribute to the development of mixed and sustainable communities.

7.38 The table under paragraph 3.56 of the submitted Addendum to Planning Statement provides analysis of the submitted housing mix versus the estimated size of housing required in the Council's Housing Needs Analysis 2023:

| 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%        |

- 7.39 The submitted layout includes a mix of dwelling types from one- and two-bedroom flats and two, three and four bed houses, a proportion of the latter would be provided as affordable. It is noted that no private flats are proposed. The scheme would achieve a slightly greater proportion of 1 bed and 2 bed, and a smaller proportion of 3 and 4 bed when compared against the Council's Housing Needs Analysis. Overall however the mix of housing types across the development is considered acceptable.

#### Density

- 7.40 The Draft Building a Better Future Plan identifies most of the site as falling within one of the opportunity areas (as defined by Policy 13) to achieve a minimum density of 55 dph net. Based on the Net Developable Area Plan Drawing Reference 6087-1120 Rev C, the site has a net developable area of 1.5 ha which would result in a net density of just over 60 dwellings per annum. This is supported by policy and is considered to make efficient use of land in line with NPPF objectives.
- 7.41 It is considered particularly important that density is maximised on such sites to help meet the Council's housing needs and to reduce reliance on limited green field resources in the Borough taking account the tilted balance where a five-year housing supply cannot currently be demonstrated.

#### **(iv) Impact on residential amenity (for existing and future residents)**

- 7.42 There are two main aspects to consider in relation to impacts on residential amenity, firstly – existing residents and secondly future residents of the development.

#### Existing Residents

- 7.43 In relation to existing residents the closest residential properties to the site are properties to the north of Bartons Road, to the west of Petersfield Road and to the south of Martin Road.

#### North of Bartons Road

- 7.44 The residential development would be set over 27m from No.1 Bartons Road. This separation distance would prevent unacceptable overlooking or loss of light to the residential properties north of Bartons Road. The four storey flats have been assessed against the Borough Design Guide SPD which would require a 28m separation between a 4 storey building (the proposed flats) and the two storey House (1 Bartons Road). The separation distance is approximately 55m and this avoids unacceptable overlooking, overbearing or loss of light.
- 7.45 Given this it is considered that the main impacts would result from the use of the vehicular access to Bartons Road. It should be noted that the access point is long established and was previously used to service the Electricity Board site. The residential nature of the vehicular traffic is likely to remove access by heavy goods vehicles and the use of the access is not considered to result in a harmful and unacceptable impact on existing residents.

#### West of Petersfield Road

- 7.46 These properties are set a minimum of 44m from the closest proposed apartments with the wide Petersfield Road between. The Havant Borough Design Guide requires a back to back separation distance of 24m this is far exceeded and it is not anticipated that the development would result in unacceptable overlooking or loss of light.

### Martin Road

- 7.47 The closest properties to the south of Martin Road are two storey semi-detached houses. The closest proposed units are two storey houses. These are set approximately 31m from the front of No's 6 and 8 Martin Road. This again far exceeds the 20m separation distance required by the Design Guide and as a result impacts in relation to overlooking and light (the development is to the north of Martin Road) are considered acceptable.
- 7.48 The proposal includes a cycle/pedestrian access to Martin Road. This is considered further in (v) below. Whilst it is recognised that this would result in additional activity with pedestrians and cyclists using this route it is considered an important element in ensuring the permeability of the site and encouraging non car based travel opportunities. It is not considered that the development would result in an unacceptable impact on the existing properties in Martin Road.
- 7.49 Overall the development is considered to have an acceptable relationship to existing residential properties.

### Future Residents

- 7.50 In relation to future residents, the main issues are considered to be whether the internal amenity space is acceptable, the external amenity provision (including private and shared areas), relationships between buildings (including light and overlooking issues) and the impacts of the surrounding uses noise/air source heat pump provision which has been highlighted in the Environmental Health consultation response.

### Internal Amenity Space

- 7.51 Whilst the Council has not adopted internal space standards, the internal floorspace proposed has been assessed against the Technical housing standards – nationally described space standards.
- 7.52 The houses and apartments meet the minimum Technical housing standards nationally described space standards for each of the proposed dwelling types and most of the units exceed the standards. It is therefore considered that the internal amenity space is acceptable and would provide suitable residential floorspace.

### External Amenity Space

- 7.53 With regard to external amenity space, the dwelling houses are all provided with private amenity space which varies in depth and width. The Council's Borough Design Guide SPD states that garden length should normally allow 10 metres between the dwelling and the boundary.
- 7.54 The development is constrained by the site's shape and constraints (for example underground services and noise considerations). The development aims to make best use of this brownfield site and provides development in accordance with the site's allocation for 90 dwellings. Most of the housing plots do provide a 10m or more garden depth and those that do not are considered further below:

|             |                                                      |
|-------------|------------------------------------------------------|
| Plots 1 & 2 | 9m – 9.6m depth but wide plot considered acceptable. |
| Plots 7-10  | min 8m depth but wide plots considered acceptable.   |

|             |                                                                                                              |
|-------------|--------------------------------------------------------------------------------------------------------------|
| Plots 11-13 | 8.54 – 9.77m depths – impacted by road width requirements on balance considered acceptable.                  |
| Plot 26     | 9m depth slightly wider plot considered acceptable.                                                          |
| Plots 29-33 | 7.31-8.55m depth these are impacted by road width requirements – on balance these are considered acceptable. |
| Plots 34-35 | 8.4 – 8.45m depth – on balance considered acceptable.                                                        |
| Plots 36-39 | 8.2m depth - on balance considered acceptable.                                                               |
| Plots 40-42 | 8m – 9.4m depth - on balance considered acceptable.                                                          |
| Plot 43     | 9.4m depth wider plot considered acceptable.                                                                 |
| Plot 50     | 5-6m depth but 10m width on balance considered acceptable.                                                   |
| Plots 53-54 | 7.6m depth but wide plots considered acceptable.                                                             |
| Plot 55     | 9.4m depth considered acceptable.                                                                            |

- 7.55 It is clear that the development density, site constraints and site shape have led to some compromises in terms of garden areas, however this is not considered so serious as to offset the tilted balance in this case and the houses are all provided with usable external amenity space.
- 7.56 The flats are provided with an external amenity space to the western and northern sides. The ground floor flats would mostly have a small patio areas. At first and second floor level 4 of the 9 flats would have balconies. Whilst further balconies have been sought it is understood that underground services easements impact provision to some elevations of the building. On balance it is considered that the flats would have access to acceptable external amenity either shared or private.
- 7.57 In addition, a local area of play would be provided in a position central to the development and there would be other open space along the western side of the site together with other landscaping to the eastern side of the site. It is also noted that to the east of the football club is further accessible land including public open space and a skate park. Further sports facilities are provided at Front Lawn to the west.

#### Light and overlooking

- 7.58 The Borough Design Guide SPD at 5.05 requires a minimum of 20m separation for back to back distances and this is secured across the site. The dwellings facing flank wall separation distances also generally meet the minimum 10m separation distances. Units 36 to 58 are slightly tighter but on balance these relationships are considered acceptable. Light and overlooking is considered acceptable between the houses.
- 7.59 The apartments are located to the west of the units 18-25 with the closest point between units 22-25 and are set a minimum of 15.2m off at three storey height and 16.4 at four storey level. The relationship is across a road and parking area to the more public front elevation of the houses. The orientation is helpful in that impacts on light would be later in the day with the sun swinging around to the south with reduced impacts. It is accepted that there would be some overlooking between the apartments including from balconies and the nearest dwellings. However, given the urban high density of the development a degree of overlooking is always likely to occur and it is not considered that a refusal of planning permission would be warranted in this case.

#### Noise

- 7.60 In terms of noise the main sources are considered to relate to traffic noise particularly from Petersfield Road, noise from the adjacent data centre and football / public house noise and finally from potential Air Source Heat Pump provision within the site.

- 7.61 Environmental Health have considered the proposal in detail and the scheme has been amended (for example by the provision of acoustic barriers close to the eastern boundary with the data centre). Conditions have also been recommended to ensure that internal and external areas are acceptably protected from noise.

#### Conclusion regarding amenity

- 7.62 In conclusion whilst overall the development is impacted by some constraints, given the urban location and the need to make best use of a valuable brown field resource to provide much needed residential development at an appropriate density it is considered that the development would provide acceptable amenities for future residents. It is also important to note that new residents would be aware of the proposed layout/design of the units.
- 7.63 The proposal would also result in a limited and acceptable impact on existing residents.

#### **(v) Highway impacts, on site layout and parking**

- 7.64 The proposal is supported by detailed highways information which has been amended in accordance with requirements from Hampshire County Council as the Highways Authority.
- 7.65 The main issues to be considered are as follows:

- Traffic Generation
- Site Access
- Sustainable Access
- Internal Site Layout
- Football club access
- Parking

#### Traffic Generation

- 7.66 A traffic generation assessment has been carried out and assessed by the Highway Authority. The trip rates take account of the 50% affordable housing provision (to be secured through the S106 Agreement). The Highway Authority have confirmed that predicted trip rate is considered to have been acceptably assessed.
- 7.67 Following this a junction assessment has been carried out in relation to the Site Access and Petersfield Road/Bartons Road junctions.
- 7.68 The Highways Authority have confirmed that the site access will operate within capacity and is therefore acceptable.
- 7.69 In relation to the Petersfield Road/Bartons Road junction this has been subject to further detailed consideration by the Highways Authority. They have confirmed that assessment has been made in relation to the use of the pedestrian / cycle crossing and it has been assessed that the junction would operate within capacity if the crossing is used every other cycle but marginally over capacity in the AM and substantially over in the PM peak. The Highway Authority confirm that:

*On the basis that the staging is considered to be a safer arrangement than previously proposed, the slightly reduced capacity at this junction is considered acceptable in this instance.*

- 7.70 The provision of a continuous segregated cycle route to meet the cycle phase across Bartons Road is considered an important element of the proposal. This would form part of the S106 requirements.

#### Site Access

- 7.71 The site vehicular access is in the same location as the access that served the Electricity Board site. Highways Authority have secured amendments to the site access during the consideration of the scheme and have confirmed that the proposals and have now confirmed that:

*Additional tracking in line with what was previously submitted under application App/20/00658, has been provided, which demonstrates refuse tracking for the site access along with additional tracking for Knightswood. The site access is considered acceptable in principle to the Highway Authority. The site access works as shown on drawing 24-097/016 Rev E should be secured in any future S106 agreement to be delivered by the applicant via a S278 agreement.*

#### Sustainable Access

- 7.72 Improvement works include a sparrow crossing at the junction of Bartons Road and Petersfield Road and a shared use provision from this junction to Martins Road. This is acceptable and details would be secured through the S106, S278 process.
- 7.73 The link southwards from the site to Martins Road, to facilitate the connection to the Bus stop, (and towards the town centre) has now been widened to 3m to enable cycle connections to Martins Road and onwards to the existing street network. This is acceptable to the Highway Authority. These works, which include the 3m shared use connection from the site to Martins Road (noting it crosses 3rd party Land belonging to Portsmouth City council) as shown on principle on drawing 1110 Rev I, and improvements to the bus stop which include a bus shelter, seating area and bus cage road markings, would be secured in the associated S106 agreement to be delivered by the applicant via S278 agreement. Portsmouth City Council may be required to be partied to the S106 to facilitate these works.

#### Internal site layout

- 7.74 During the consideration of the application the internal layout of the development has been amended significantly to address highways and other concerns.
- 7.75 Following on from the Highway Authority previous comments and subsequent meetings to discuss the internal site layout, a revised layout and associate tracking drawings have been provided that addresses all previous concerns. For the majority of the internal layout, a 5.5m carriageway with a 2m footway has been provided, with this narrowing down to shared space environment of 5m. Tracking has been provided which demonstrates two-way vehicular movement throughout the majority of the site is possible. The road layout is now therefore acceptable.

#### Adoption

- 7.76 Drawing 24-097/015 Rev D, has been updated following on from the revision to the internal site layout. This now shows the areas that are to remain in private ownership, transferred to a management company, and offered to HCC for adoption. Whilst the Highway Authority are satisfied that adoption plan incorporates the majority of all the necessary visibility splays, the finer the details of the extent of the adoption will need to be agreed through the S38 process with the Highway Authority.

#### Football Club Access

- 7.77 The proposal includes a revised access to Havant and Waterlooville football club through the application site. This retains what is understood to be an access used for limited access for the football club. Final details would be secured by condition and it is understood that the football do not object to the access changes.
- 7.78 The Highway Authority have confirmed that the submitted drawings have been updated to show this access as a 3m wide vehicle cross over, with associated visibility splays provided. This is now acceptable to the Highway Authority.

#### Parking

- 7.79 In relation to parking the development would include allocated and unallocated parking provision.
- 7.80 The application is supported by a Parking Technical Note and Parking Plan which has been assessed alongside the Councils Parking SPD.
- 7.81 The Parking Standards set out the following requirements:

##### Allocated Parking:

| Size of Dwelling | Minimum Car Parking Requirement |
|------------------|---------------------------------|
| 1 Bed            | 1 Space                         |
| 2 Bed            | 2 Spaces                        |
| 3 Bed            | 2 Spaces                        |
| 4 + Bed          | 3 Spaces                        |

*An additional 20% of unallocated parking for visitors should be accommodated. Tenure can influence car ownership. Rented accommodation, particularly social rented housing, can have fewer cars than owner occupied households of a similar size and type.*

##### Unallocated Parking:

| Size of Dwelling | Minimum Car Parking Requirement |
|------------------|---------------------------------|
| 1 Bed            | 0.9 Spaces                      |
| 2 Bed            | 1.3 Spaces                      |
| 3 Bed            | 1.9 Spaces                      |
| 4 + Bed          | 2.4 Spaces                      |

*An additional 20% of unallocated parking for visitors should be accommodated. Tenure can influence car ownership. Rented accommodation, particularly social rented housing, can have fewer cars than owner occupied households of a similar size and type.*

- 7.82 The Parking Technical Note sets out the approach to parking across the site. Firstly it sets out the parking requirement across the site is all the parking were to be unallocated as follows:

| Dwelling Type   | No. of Units | Minimum Car Parking Requirement | Parking Required as per Parking Standards |
|-----------------|--------------|---------------------------------|-------------------------------------------|
| 1 Bed           | 11           | 0.9 Spaces                      | 10                                        |
| 2 Bed           | 33           | 1.3 Spaces                      | 43                                        |
| 3 Bed           | 36           | 1.9 Spaces                      | 68                                        |
| 4+ Bed          | 10           | 2.4 Spaces                      | 24                                        |
| Total           |              |                                 | 146                                       |
| Visitor Parking |              |                                 | 30                                        |
|                 |              |                                 | 176                                       |

- 7.83 The proposed layout provides 146 resident spaces and 30 visitor spaces and would meet the parking standards if all parking were unallocated.
- 7.84 However, it is not appropriate for all parking to be unallocated as some of the spaces are in plot and others clearly would be appropriately allocated to the properties to which they relate.
- 7.85 The Parking Technical Note therefore assesses the allocated and unallocated parking to be provided for private and shared ownership plots (this needs to be in accordance with the parking standards) as follows:

#### Unallocated parking

| Dwelling Type | No of Units | Minimum Car Parking Requirement | Parking Requirement as per HBC standards |
|---------------|-------------|---------------------------------|------------------------------------------|
| 1 Bed House   | 0           | 0.9                             | 0                                        |
| 2 Bed House   | 6           | 1.3                             | 8                                        |
| 3 Bed House   | 24          | 1.9                             | 46                                       |
| 4 Bed House   | 5           | 2.4                             | 12                                       |
|               |             | Subtotal                        | 66                                       |

#### Allocated Parking

|             |    |          |     |
|-------------|----|----------|-----|
| 2 Bed House | 6  | 2        | 12  |
| 3 Bed House | 10 | 2        | 20  |
| 4 Bed House | 3  | 3        | 9   |
|             |    | Subtotal | 41  |
|             |    | Total    | 107 |

- 7.86 The Parking Technical Note discusses the social / affordable rented accommodation parking requirements taking account of the Parking SPD which states:

*Tenure can influence car ownership. Rented accommodation, particularly social rented housing, can have fewer cars than owner occupied households of a similar size and type. However there is the potential for tenure to change over the life of most dwellings to owner occupied status. Reductions will only be considered for rented properties where there is evidence that the tenure is unlikely to change or the developers can demonstrate that lower standards would be appropriate.*

- 7.87 In this case the affordable housing requirements would be secured through the S106 Agreement.
- 7.88 The development includes a minimum of 36 social / affordable rented dwellings and the S106 agreement would secure a minimum of 50% of the 90 dwellings as affordable units.
- 7.89 The considers census data for the area in relation to social / affordable rented housing with most households in social rented have no or 1 car (86%). Whilst the parking standards would require 47.2 spaces for the social rented / affordable spaces 39 would be provided. This is however justified by the census data, TRICS assessment and the relatively sustainable location of the site.
- 7.90 Planning Policy have commented that:
- .....it is considered that the level of parking is appropriate to the location of the development.*
- 7.91 It is considered that the slightly reduced parking for the social rented / affordable units has been fully justified. Parking at the site is considered acceptable and is not anticipated to result in pressure for off site parking to take place.
- 7.92 The site is located adjacent to Havant and Waterlooville Football Club and there is potential for match day parking in relation to the football club. This would have the potential to cause amenity issues and stress on parking on match days. It is therefore recommended that a condition is imposed to require a parking management plan in relation to parking on matchdays.

#### Highways S106 requirements

- 7.93 The Highway Authority set out their requirements in relation to obligations for the S106 Agreement as follows:

#### Obligations:

The following works should be secured for delivery by the applicant in the S106 agreement.

- Site access works on Bartons Road as shown in principle on drawing 24 097/016 Rev E
- Sparrow Crossing and associated works as shown in principle on drawing 24-097/016 Rev E
- Shared use path along Bartons Road from the junction of Petersfield Road/ Bartons Road connecting to the existing at Marting Road, as shown in principle on drawing 24-097/016 Rev E and 24-097/017 Rev C
- A Share use pedestrian and cycle link from the south of the development to Martins Road, and additional improvements to the Bus stop which include a bus shelter, seating area and bus cage road markings as shown on principle on drawing 1110 Rev I.

#### **(vi) Flood Risks / Drainage**

- 7.94 The site is located within Flood Zone 1 (Low Flood Risk), it is however noted that the site is shown to be at risk of flooding in relation to surface water. In addition, the site is situated in a sensitive groundwater catchment, within Source Protection Zone 1c

(SPZ1c) for the Havant and Bedhampton Springs catchment, a vital public water supply source, providing water to the city of Portsmouth and the surrounding area.

- 7.95 The application has been supported by a Flood Risk Assessment and other drainage and flood risk information and consultations have been carried out with the Environment Agency, Hampshire County Council as the Local Lead Flood Authority (LLFA) and Portsmouth Water.
- 7.96 No comments have been received from the Environment Agency, although this is to be expected given the Flood Zone 1 status of the site and the proposed use of existing sewerage infrastructure.
- 7.97 The LLFA required further information during the consideration of the planning application in particular in relation to surface water flows. They have now confirmed that they have no objection to the proposal.
- 7.98 In relation to Source Protection, Portsmouth Water have confirmed that they have no objections in principle to the development subject to the imposition of conditions for example in relation to piling and foundation designs to prevent potential for pollution to the water environment.
- 7.99 In relation to foul and surface water drainage from the site the proposals are as follows:

#### Surface Water

- 7.100 • Water run-off from the roof surfaces of the proposed dwellings will be collected using traditional rainwater pipes, discharging locally to underground pipes which will discharge via permeable paved areas/ underground piped network to geocellular attenuation crates underneath parking areas, prior to discharging to the off site sewer.
- Runoff from the main access/internal road areas will drain via trapped road gullies to an underground piped network and into the underground attenuation areas.
  - Runoff from parking/driveways will drain via permeable paving discharging to the underground piped network/attenuation crates.
  - Patios and footpaths of private dwellings will drain to lawns and soft landscaped areas.
- 7.101 The proposals have been assessed by Southern Water, the LLFA and Portsmouth Water and conditions are recommended to secure the appropriate drainage conditions. Southern Water have confirmed that they have no objection to the discharge to the surface water sewer at a restricted rate. An agreement would need to be secured with Southern Water separately to the planning decision.

#### Foul Drainage

- 7.102 Foul drainage would discharge to an existing foul sewer to the south of the site in Martin Road. Agreement will be required outside the planning application process to secure capacity in the network.

#### **(vii) Contamination Issues**

- 7.103 In relation to contamination, the site is a former office building but with demolition spoils on the site. The Council's Environmental Control Officer has recommended conditions in relation to contamination issues, these combined with requirements in relation to the water environment are recommended to address potential concerns.

### **(viii) Ecological Impacts & BNG**

7.104 The application has been supported by a Preliminary Ecological Appraisal, an Invertebrate Survey, a Biodiversity Net Gain Statutory Metric and Biodiversity Net Gain Report.

7.105 The Council's Ecologist has confirmed that: *Overall, I am content that the potential impacts on protected and notable species have been assessed proportionately. A series of recommendations for impact avoidance and mitigation are provided and these are satisfactory.* A condition is recommended in relation to ensure the provision of a Construction Environmental Management Plan to protect on site ecology.

7.106 In relation to Biodiversity Net Gain the proposal includes off site measures at Halnaker Farm. The Council's Ecologist confirms that *I am content that the proposed habitat bank units will deliver nature recovery, albeit outside the borough.* Conditions are recommended to secure Biodiversity Net Gain.

### **(ix) Impacts on Trees**

7.107 With regards to trees, the application is supported by an Arboricultural Report which has been updated in relation to trees in relation to footpath links.

7.108 The site is mainly devoid of trees excepting some small areas of regenerative growth following demolition of the former buildings on the site.

7.109 There are trees close to the site boundaries along the southern and northern sides. The Council's Arboriculturalist has confirmed that the development is acceptable subject to an arboricultural condition which is recommended.

### **(x) Sustainable Development**

7.110 The application is supported by an Energy & Sustainability Statement. This sets out the Sustainability Strategy for the development and states:

7.111 The key sustainability measures to be incorporated into the development proposals are summarised below:

- A commitment that the proposed water saving measures will 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. **Officer Comment:** *This will be secured by condition.*
- Electric Vehicle (EV) Charging Points to be included throughout the proposed development. **Officer Comment:** *This will be secured by condition.*
- A high quality construction and design specification will prioritise materials within 'A+', 'A' or 'B' ratings, and low embodied carbon materials selected wherever feasible using a whole life-cycle approach. Minimisation of waste and promotion of Circular Economy Measures into all aspects of design, construction and operation.
- A Travel Plan has been developed to promote active and sustainable transport modes. **Officer Comment:** *It should be noted that a Travel Plan is not required for this scale of development as confirmed by the Highways Authority.*

- Ecology/Landscaping – Extensive planting is proposed throughout. A 10% net gain in biodiversity will be achieved through offsite measures. **Officer Comment:** *BNG will be secured by condition.*

- 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).

**Officer Comment:** *Drainage details will be secured by condition.*

- Air quality has been assessed, and subject to appropriate mitigation measures, the overall effect with regard to air quality is considered 'not significant'.

- Noise pollution – A Noise Assessment has demonstrated that subject to relevant mitigation measures, the site is suitable for the proposed development in terms of noise levels. **Officer Comment:** *Conditions are recommended in relation to noise environments for residents.*

- Details the measures that will be introduced to help mitigate against the risk of overheating to the dwellings in the summer months.

7.112 In addition to the above the provision of pedestrian and cycle links together with bus stop improvements (secured through the S106 Agreement) would provide sustainable transport options.

7.113 The Councils Climate Change Coordinator has recommended conditions to secure a sustainable form of development is achieved as set out in Part 9.

7.114 Overall and subject to conditions the development is considered to represent sustainable development.

#### **(xi) Infrastructure including CIL / S106 requirements**

7.115 The proposals are subject to CIL requirements

7.116 The following requirements would be secured via the S106 process:

##### Transport Obligations

- Site access works on Bartons Road as shown in principle on drawing 24 097/016 Rev E
- Sparrow Crossing and associated works as shown in principle on drawing 24-097/016 Rev E
- Shared use path along Bartons Road from the junction of Petersfield Road/ Bartons Road connecting to the existing at Marting Road, as shown in principle on drawing 24-097/016 Rev E and 24-097/017 Rev C 5
- A Shared use pedestrian and cycle link from the south of the development to Martins Road, and additional improvements to the Bus stop which include a bus shelter, seating area and bus cage road markings as shown on principle on drawing 1110 Rev I.

##### Affordable Housing

- Tenure mix requirements
- Delivery requirements

##### Bird Aware Solent Strategy Contribution

### Open Space and Green Infrastructure Obligations

- SUDs Bond
- Common Parts Residential Management Company and Residential Management Plan
- Open Space
- Play Area
- Permissive Paths

### Biodiversity Net Gain

- Monitoring Contribution

### Habitats Obligations

- Nitrogen Mitigation Monitoring Contribution

### Miscellaneous Obligations

- Community Project Worker Contribution
- Health Contribution
- Employment and Skills plan

## **8 Conclusions**

8.1 In conclusion:

8.2 The site is allocated for residential development in the adopted Local Plan. The development would be on a brownfield site and the density of development would make best use of this precious land resource.

8.3 The Council is unable to demonstrate a five-year housing supply and the proposal would result in much needed housing development including a minimum of 50% affordable housing which would benefit those in need of housing provision in the Borough.

8.4 The site is relatively self-contained and the development is considered to result in an acceptable impact on the character and appearance of the area.

8.5 The housing mix includes the provision of 1 and 2 bed apartments and a mix of dwelling types and sizes across the development which is considered acceptable.

8.6 The development would provide an acceptable living environment for future residents in terms of internal and external amenity space and would not result in unacceptable impacts on existing surrounding residents.

8.7 Highway impacts have been carefully assessed and the development amended during the course of the application to address issues identified by the Highways Authority and in relation to parking provision. Subject to conditions and S106 requirements the proposals are considered acceptable.

- 8.8 Flood risk and drainage issues have been addressed with consultees and subject to appropriate conditions the development is considered acceptable in terms of flood risk, potential impacts on the water environment, surface and foul drainage.
- 8.9 Potential contamination issues given historic uses of the site will be addressed by condition.
- 8.10 Ecological impacts and BNG together with Water and Recreational impacts have been addressed via the Habitats Regulations / Appropriate Assessment requirements and conditions.
- 8.11 Impacts in relation to trees have been assessed and a condition is recommended to ensure that impacts are in accordance with the Arboricultural Assessment.
- 8.12 In relation to Sustainability, sustainable transport options will be secured by the S106 and further measures in relation to sustainable features of the development are controlled by condition.
- 8.13 Finally, S106 obligations are set out to ensure that the development represents sustainable development and secures improvements required to make the application acceptable. The development would also be CIL liable in relation to market housing.
- 8.14 Overall, the development is considered to be acceptable subject to the S106 requirements and the conditions set out below.

## 9. RECOMMENDATION:

That the Interim Head of Planning be authorised to Approve with Conditions for application APP/25/00639

This is subject to completion of S106

### Conditions:

|   |                                                                                                                                                                                                                                                                                                      |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <p>The development must be begun not later than three years beginning with the date of this permission.</p> <p><b>Reason:</b> To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.</p> |
| 2 | <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p>                                                                                                                                                                                        |

|  |                                              |                     |
|--|----------------------------------------------|---------------------|
|  | Site Location Plan                           | 6087-1100-RevA      |
|  | Proposed Block Plan                          | 6087-1110-RevJ      |
|  | Net Developable Area                         | 6087-1120-RevC      |
|  | Boundary and Dwelling Material Layout        | 6087-1150-RevD      |
|  | Illustrative Site Layout                     | 6087-SK005 RevB     |
|  | Landscape Plan                               | 2445 (08) 01 01 P12 |
|  | Apartments Ground & First Floor Layout Plans | 6087-1220-RevE      |
|  | Apartments Second & Third Floor Layout Plans | 6087-1221-RevE      |
|  | Apartments Roof Plan                         | 6087-1222-RevE      |
|  | Typical Apartment Layouts                    | 6087-1223-RevC      |
|  | Apartment Elevations Sheet 1 of 2            | 6087-1350-RevD      |
|  | Apartment Elevations Sheet 2 of 2            | 6087-1351-RevD      |
|  | M2.3-Option 1-A                              | 6087-1260-RevA      |
|  | M2.3-Option 2-A                              | 6087-1261-RevA      |
|  | M3.11-Option 1-B                             | 6087-1252-RevB      |
|  | M3.11-Option 2-B                             | 6087-1253-RevB      |
|  | M3.12-Option 1-B                             | 6087-1254-RevB      |
|  | M3.12-Option 2-B                             | 6087-1255-RevB      |
|  | M3.13-Option 1-B                             | 6087-1256-RevB      |
|  | M3.13-Option 2-B                             | 6087-1257-RevB      |
|  | M4.12-Option 1-A                             | 6087-1262-RevA      |
|  | M4.12-Option 2-A                             | 6087-1263-RevA      |
|  | Proposed Sections                            | 6087-1300-RevD      |
|  | Existing Sections                            | 6087-1310-RevA      |
|  | <b>Other Documents</b>                       |                     |

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|  | <p>Air Quality Assessment RP01-24394-R2</p> <p>Arboricultural Impact Assessment MW.2407.SSE.AIA</p> <p>Arboricultural Technical Note MW.2407.SSE.TN</p> <p>Archaeological Desk Based Assessment 794-PLN-HER-01820 V2</p> <p>Biodiversity Net Gain R2724_BNG_c</p> <p>Design &amp; Access Statement 6087 RevA</p> <p>Design &amp; Access Statement Addendum 6087 RevA</p> <p>Ecological Appraisal R2724_PEA_e</p> <p>Energy &amp; Sustainability Statement PA-ES-SB-BR-25-02</p> <p>Flood Risk and Drainage Strategy 24-097-002-Rev A</p> <p>Flood Risk &amp; Drainage Addendum 24-097-RPT-008 RevA</p> <p>Long Sections 24-097-023</p> <p>Phase 1 Geo-Environmental Desk Study BRD4469-OR1-B</p> <p>Phase 2 Geo-Environmental SI BRD4469-OR2-C</p> <p>Soakage Investigation BRD4469-OR3-C</p> <p>Invertebrate Survey R2724_INV_a</p> <p>Lighting 143525-00097 - R1a</p> <p>Noise Impact Assessment RP02-24394-R5</p> <p>Nutrient Calculator Solent Maritime V_03_01_3_110 lpd</p> <p>Havant Occupancy Calculator Dec 25</p> <p>Planning Statement Aug-25</p> <p>Statement of Community Involvement</p> <p>Transport Assessment</p> <p>Transport Assessment Addendum</p> <p>RSA Stage 1 - Designers Response</p> |
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|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <p>Parking Technical Note</p> <p>Highways Layout _General Highways 24-097-007_Rev K</p> <p>Highways Layout _Refuse 24-097-008_Rev J</p> <p>Highways Layout _Fire 24-097-009_Rev H</p> <p>Highways Layout _Delivery Van 24-097-022_Rev B</p> <p>Highways Adoption Plan 24-097-015_Rev D</p> <p>Proposed Site Access 24-097-016_Rev E</p> <p>Proposed Footway Widening 24-097-017_Rev C</p> <p>Proposed Site Access Swept Path 24-097-018 Rev B</p> <p>Proposed Bus Stop Improvements 24-097-006</p> <p>Utilities Statement</p> <p>Reason: - To ensure provision of a satisfactory development.</p>                                                                                                                                                                                                                                                                                                           |
| 3 | <p>Prior to the commencement of development, details of the proposed secondary access serving Havant and Waterlooville Football Club shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The submitted details shall include, but not be limited to, the design, layout, and specification of any height and width restriction measures to be installed.</p> <p>The secondary access shall be completed in full in accordance with the approved details prior to the first occupation of the development and shall be retained thereafter.</p> <p><b>Reason:</b> To ensure that safe and suitable access to the site is provided, in the interests of highway safety, and to ensure that the proposed height and width restriction measures are appropriate for the intended use of the secondary access in accordance with Havant Local Plan Policies CS20 and CS16.</p> |
| 4 | <p>No development shall take place until details of existing and finished floor and site levels relative to previously agreed off-site datum point(s) have been</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|   | <p>submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details.</p> <p><b>Reason:</b> In the interests of amenity, to prevent flood risk and to ensure appropriate highway and footpath design having due regard to policies CS15, CS16, CS20 and DM11. It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 5 | <p>Notwithstanding any description of materials in the application no above ground construction works shall take place until samples or a full specification of the materials to be used externally on the buildings have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of the materials. Only the materials so approved shall be used, in accordance with any terms of such approval.</p> <p><b>Reason:</b> To ensure the appearance of the development is satisfactory and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 6 | <p>Notwithstanding the submitted landscaping details, no development shall commence unless and until a detailed landscaping plan has been submitted to and approved in writing by the Local Planning Authority, The approved landscaping works shall be carried out in accordance with the approved details and in accordance with any timing / phasing arrangements approved or within the first planting season following final occupation of the development hereby permitted, whichever is the sooner. The plan shall take account of underground services and their protection. Any trees or shrubs planted or retained in accordance with this condition which are removed, uprooted, destroyed, die or become severely damaged or become seriously diseased within 5 years of planting shall be replaced within the next planting season by trees or shrubs of similar size and species to those originally required to be planted.</p> <p><b>Reason:</b> To ensure the appearance of the development is satisfactory and having due regard to policies CS11, CS16 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> |
| 7 | <p>No part of the development shall be first occupied until details of the type, siting, design and materials to be used in the construction of all means of enclosure including boundaries, screens or retaining walls, have been submitted to and approved in writing by the Local Planning Authority and the approved structures have been erected in accordance with the approved details. The structures shall thereafter be retained.</p> <p><b>Reason:</b> To safeguard the amenities of the locality [and/or] occupiers of neighbouring property and having due regard to policy CS16 of the Havant</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|    | Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8  | <p>Notwithstanding the provisions of any Town and Country Planning General Permitted Development Order, no extensions, roof alterations or outbuildings shall be constructed within the curtilages of the dwelling houses hereby permitted without the prior approval of the Local Planning Authority.</p> <p><b>Reason:</b> In the interests of the character of the development and residential amenities having due regard to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                     |
| 9  | <p>No dwelling hereby permitted shall be first occupied anywhere on the site until the road(s) serving that dwelling have been laid to at least base course.</p> <p><b>Reason:</b> To avoid excess soil being deposited on the existing roads and having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10 | <p>The car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be made fully available for use prior to the relevant part of the development being first occupied and shall be retained thereafter for their intended purpose.</p> <p><b>Reason:</b> In the interests of highway safety and having due regard to policy DM13 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                  |
| 11 | <p>No development hereby permitted shall commence until a specification of the materials to be used for the surfacing of all open parts of the site proposed to be hardsurfaced has been submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall not be occupied until the implementation of all such hardsurfacing has been completed in full accordance with that specification.</p> <p><b>Reason:</b> In the interests of the amenities of the locality and having due regard to policies CS16 and CS20 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework. It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.</p> |
| 12 | Prior to the occupation of the development hereby permitted a parking management scheme in relation to the management of match day traffic parking associated with the adjacent Havant and Waterlooville Football Club                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|    | <p>detailing how parking by match day traffic will be managed to prevent parking on the application site shall be submitted to and approved in writing by the Local Planning Authority. The parking management plan shall thereafter be operated on match days unless otherwise agreed in writing by the Local Planning Authority.</p> <p><b>Reason:</b> In the interests of the amenities of the site and traffic management having due regard to policies CS20 and DM13 of the Havant Borough Local Plan (Core Strategy) 2011, and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 13 | <p>No development shall commence until a sustainability statement has been submitted to and approved in writing by the Local Planning Authority. The sustainability statement shall detail how the dwellings shall incorporate low carbon and renewable technology. The statement shall detail how the development will follow an energy hierarchy, design out carbon and follow fabric first principles. As a minimum the development shall achieve a reduction in CO2 emissions of at least 31% of the Dwelling Emission Rate (DER) compared to the Target Emission Rate (TER) of Part L of the 2022 Building Regulations. The development shall be carried out in full accordance with the approved details.</p> <p><b>Reason:</b> In the interest of sustainability and having regards to the Council's Climate Change Strategy and Action Plan and policies CS13, CS11 and CS14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework. This is a pre-commencement condition as it goes to the heart of the permission.</p> |
| 14 | <p>No development shall commence until a sustainability statement has been submitted to and approved in writing by the local planning authority outlining and showing in detail where the Electrical Vehicle Charging points for the development shall installed. The approved Charging Points shall be installed prior to the occupation of the development and retained and maintained at all times thereafter.</p> <p><b>Reason:</b> In the interest of sustainability and having regards to the Council's Climate Change Strategy and Action Plan and policies CS13, CS11 and CS14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework. This is a pre-commencement condition as it goes to the heart of the permission.</p>                                                                                                                                                                                                                                                                                               |
| 15 | <p>A Biodiversity Gain Plan shall be prepared in accordance with Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and must include:</p> <p>(1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

- (2) the pre-development biodiversity value of the on-site habitat;
- (3) the post-development biodiversity value of the on-site habitat;
- (4) any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;
- (5) any biodiversity credits purchased for the development; and
- (6) any such other matters as the Secretary of State may by regulations specify.

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:

- (7) a non-technical summary;
- (8) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (9) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (10) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (11) the monitoring methodology and frequency in respect of the created or enhanced habitat.

Notice in writing shall be given to the Council when the:

- (12) HMMP has been implemented; and
- (13) habitat creation and enhancement works as set out in the HMMP have been completed.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|    | <p>accordance with the methodology and frequency specified in the approved HMMP.</p> <p><b>Reason:</b> To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 16 | <p>Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them.</p> <p><b>Reason:</b> To protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife &amp; Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                            |
| 17 | <p>Construction Environmental Management Plan (Ecology)</p> <p>Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them.</p> <p><b>Reason:</b> To protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife &amp; Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> |
| 18 | <p>The development hereby permitted shall not commence unless the Council has received evidence that the required nitrate mitigation capacity has been allocated to the development pursuant to the allocation agreement dated 31<sup>st</sup> July 2025 between (1) Albion Water Limited and (2) Stonebond Properties (Guildford) Limited.</p> <p><b>Reason:</b> To accord with the Habitats Regulations Assessment / Appropriate Assessment, policies CS11 and CS21 of the Havant Borough Local Plan (Core Strategy) 2011, the Habitat Regulations and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                |

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| 19 | <p>Construction Environmental Management Plan (Health and Highway Matters)</p> <p>No development (including demolition) shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the Local Planning Authority. The approved CEMP shall be adhered to throughout the construction period.</p> <p>The CEMP shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) Development contacts, roles and responsibilities</li> <li>b) An indicative programme for carrying out the works</li> <li>c) Parking of vehicles of site operatives and visitors</li> <li>d) A public communication strategy, including a complaints procedure</li> <li>e) Loading and unloading of plant and materials</li> <li>f) Storage of plant and materials used in constructing the development</li> <li>g) Security hoarding, including decorative displays where appropriate</li> <li>h) Wheel-washing facilities</li> <li>i) Measures to control dust and dirt emissions during construction</li> <li>j) Measures to control noise and vibration during construction</li> <li>k) A scheme for recycling and disposing of construction/demolition waste</li> <li>l) Construction working hours, which shall restrict all construction activities (including deliveries and the movement of construction vehicles) to: 08:00-18:00 Monday to Friday, 08:00-13:00 on Saturdays, with no construction activities on Sundays or Public Holidays</li> </ul> <p>Notes:</p> <p>The noise control element of the CEMP shall demonstrate that Best Practicable Means shall be implemented, guidance can be found in BS5228-1:2009 and the CIEH document 'London Good Practice Guide: Noise &amp; Vibration Control for Demolition and Construction, 2016'.</p> |
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|    | <p>The dust-control element of the CEMP shall include a site-specific Dust Management Plan prepared in accordance with the IAQM Guidance on the Assessment of Dust from Demolition and Construction (2024).</p> <p><b>Reason:</b> To protect the amenity of residents living in the vicinity of the site having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 20 | <p>Prior to the commencement of any development within a 5m external buffer to plots 16-20 (as shown on Drawing no. 1110 rev D 31/07/2025, rev date 04/12/2025), an assessment of the presence, nature and extent of contamination shall be submitted to- and approved in writing by-the Local Planning Authority. The assessment shall account for the findings of prior site investigation reports, be undertaken by competent persons, and the findings be presented as a written report.</p> <p>The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;</p> <p>1) Site investigation appropriate to the potentially contaminating landuse features formerly present in this region of the site; to provide sufficient data and information to adequately identify &amp; characterise any physical contamination on or affecting these plots, and to inform an appropriate assessment of the risks to future occupants.</p> <p>2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;</p> <ul style="list-style-type: none"> <li>• appropriately considered remedial objectives,</li> <li>• an appraisal of remedial &amp;/or risk mitigation options, having due regard to sustainability, and;</li> <li>• clearly defined proposals for mitigation of the identified risks.</li> </ul> <p>3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.</p> |

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|    | <p>All elements shall be adhered to unless agreed in writing by the Local Planning Authority</p> <p><b>Reason:</b> To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) 2014, and the National Planning Policy Framework. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&amp;/or activity). Contamination could pose a risk to future occupiers of the affected plots.</p>                                                                                                                  |
| 21 | <p>Prior to the commencement of the development details of the following items must be agreed in writing with the Local Planning Authority in consultation with the Highway Authority:</p> <ul style="list-style-type: none"> <li>A. Street Lighting Design</li> <li>B. Drainage Strategy</li> <li>C. Final ground levels plan</li> <li>D. Final materials plan</li> </ul> <p>The above matters should be implemented in accordance with the approved plans and be implemented prior to the occupation of any dwellings of which are reliant on such part of the network for access.</p> <p><b>Reason:</b> To ensure the development provides safe and suitable access and highway arrangements, and to secure appropriate drainage, levels and materials within adoptable or highway-related areas, in accordance with Policies DM11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> |
| 22 | <p>No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water, Southern Water and the Local Lead Flood Authority. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied. Details of how the scheme shall be maintained and managed after</p>                                                                                                                                                                                                                                                                                                                                             |

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|    | <p>completion. The drainage detail submitted to the Local Planning Authority shall:</p> <ul style="list-style-type: none"> <li>- Specify the responsibilities of each party for the implementation of the SuDS scheme.</li> <li>- Specify a timetable for implementation.</li> <li>- Provide a management and maintenance plan for the lifetime of the development.</li> </ul> <p>This shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.</p> <p><b>Reason</b> - To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site having due regard to policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                    |
| 23 | <p>No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.</p> <p>The scheme shall also include:</p> <ul style="list-style-type: none"> <li>• details of how the scheme shall be maintained and managed after completion.</li> <li>• details of the sewage pipe work layout and specifications.</li> </ul> <p><b>Reason</b> - This is in order to manage the quantity of foul sewage and protect water resources. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage and having due regard to policies CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011, The Environment Agency's approach to groundwater protection and the National Planning Policy Framework.</p> |
| 24 | <p>No development shall commence on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|    | <p>This shall include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.</p> <p><b>Reason-</b> Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local public water supply source and having due regard to policies CS11, CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 25 | <p>Prior to the commencement of development details of landscaping proposals in proximity to public apparatus shall be submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The landscaping shall be carried out in accordance with the approved details.</p> <p><b>Reason:</b> In order to protect public apparatus and having due regard to policies CS15, CS19 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 26 | <p>Noise levels</p> <p>Prior to above-ground works, details of a scheme for protecting the proposed dwellings from external noise shall be submitted and approved in writing by the Local Planning Authority. Such a scheme shall ensure that upon completion of the development, the following noise criteria (as recommended in BS8233:2014 and WHO guidance) shall be met:</p> <ul style="list-style-type: none"> <li>i. all bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A)</li> <li>ii. all living rooms and bedrooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)</li> <li>iii. LAmax,F noise levels shall not exceed 45 dBA more than 10 times between 23.00 – 07.00 hours inside bedrooms</li> <li>iv. External amenity areas will achieve noise levels consistent with the guideline values set out in BS 8233:2014</li> <li>v. Where boosted mechanical extract ventilation is necessary to assist with the control of overheating , noise from these systems while operational shall not normally exceed NR25 within bedrooms and NR30 within living rooms (the NR curves are described within Annex B of BS 8233:2014).</li> </ul> |

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|    | <p>A noise validation report demonstrating compliance with these noise criteria shall be submitted to and approved by the Local Planning Authority before any dwelling is occupied. The assessment shall include representative sampling from a minimum of 5 dwellings exposed to the highest road traffic and commercial noise levels. This assessment shall be conducted with the approved ventilation strategy operating (e.g., trickle vents in the open position, or mechanical ventilation systems running). Such noise protection measures shall thereafter be maintained and operated in accordance with the approved scheme.</p> <p><b>Reason:</b> To protect the amenity of future residents having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                      |
| 27 | <p>Acoustic barriers</p> <p>Acoustic barriers and fencing shall be installed in accordance with Appendix 6 of the Cass Allen Noise Assessment Report reference: RP01-24394-R4' (dated 18th March 2026) prior to occupation of the development.</p> <p>Prior to their installation, details of the proposed acoustic barriers and close boarded fencing shall be submitted for the written approval of the Local Planning Authority. This shall include the materials, specification, dimensions and mass of the barriers and fencing, and elevation details at a scale of 1:50, 1:100 or as appropriate. The development shall then be carried out in strict accordance with the approved details, and the barriers and fence shall be maintained and retained at all times in perpetuity.</p> <p><b>Reason:</b> to protect the amenity of future occupiers having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> |
| 28 | <p>Noise from building services plant</p> <p>The combined noise rating level (L<sub>A</sub>r,Tr) of plant and equipment shall not exceed 48dB L<sub>A</sub>eq, 1hr/ between the hours of 07.00hrs – 23.00 hrs and 37dB L<sub>A</sub>eq, 15 mins between the hours of 23.00hrs and 07.00hrs when measured in 'free-field' conditions at any height above ground and 1.0 m from the nearest noise sensitive property façade.</p> <p>A noise validation report demonstrating compliance with these noise criteria shall be submitted to and approved by the Local Planning Authority before any dwelling is occupied.</p>                                                                                                                                                                                                                                                                                                                                                                             |

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|    | <p><b>Reason:</b> To protect the amenity of residents having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 29 | <p>Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition 11 shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met.</p> <p><b>Reason:</b> To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&amp;/or activity). Contamination could pose a risk to future occupiers of the affected plots.</p> |
| 30 | <p>Prior to the first occupation of the development, a site management plan will be submitted to and approved in writing by the local planning authority that identifies any areas within the site that will form part of any highway adoption, controlled by a site management company or transferred as part of plots for private ownership. The approved plan shall thereafter be implemented, unless otherwise agreed in writing by the local planning authority.</p> <p><b>Reason:</b> In the interests of highway safety and having due regard to Policies DM11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 31 | <p>The development hereby permitted shall not be occupied until:</p> <p>(a) A water efficiency calculation in accordance with the Government's National Calculation Methodology for assessing water efficiency in new dwellings has been undertaken which demonstrates that no more than 110 litres of water per person per day shall be consumed within the development, and this calculation has been submitted to, and approved in writing by, the Local Planning Authority; and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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|    | <p>(b) All measures necessary to meet the approved water efficiency calculation have been installed.</p> <p><b>Reason:</b> There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent. Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. In compliance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the local planning authority has a duty to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council has also had regard to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011.</p>                                                                                             |
| 32 | <p>At all times following occupation of the development hereby approved, all measures for water usage within the submitted nutrient budget shall be maintained in the development in perpetuity.</p> <p><b>Reason:</b> There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent. Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. In compliance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the local planning authority has a duty to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council has also had regard to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011.</p> |
| 33 | <p>The development hereby permitted shall only be carried out in accordance with the Arboricultural Impact Appraisal and Preliminary Arboricultural Method Statement (Reference: MMW.2407.SSE.AIA ) as amended by the Technical Note – Mark Wellby (March 2026) and British Standard BS5837: 2012 (Trees in relation to design, demolition and construction - Recommendations).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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|    | <p><b>Reason:</b> To ensure the continuity of amenity value afforded by the trees in question and in accordance with policies CS16 and DM8 of the Havant Borough Core Strategy (2011) and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 34 | <p>Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Preliminary Ecological Appraisal (John Wenman, December 2025), Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and Biodiversity Net Gain Assessment report (John Wenman, December 2025).</p> <p><b>Reason:</b> To protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife &amp; Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.</p>                                                                                                                                                                                                                                                                                                                                 |
| 35 | <p>External Lighting</p> <p>No external lighting shall be installed until details have been submitted to and approved in writing by the Local Planning Authority, prior to the commencement of the development. This submission shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). The approved scheme shall be installed, maintained, and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.</p> <p>External lighting shall be designed and installed in accordance with ILP Guidance Note 1 for the reduction of obtrusive light, 2021.</p> <p><b>Reason:</b> To protect residents from light pollution having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> |
| 36 | <p>Prior to the installation of any air source heat pump (ASHP) or other external domestic building services plant, a noise impact assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be carried out in accordance with BS 4142:2014+A1:2019 and shall demonstrate that the rating level of noise emitted from the plant will not exceed the existing background sound level at any noise-sensitive receptor.</p> <p>Where the assessment identifies the need for mitigation, a scheme of works shall be submitted to and approved by the Local Planning Authority. All approved mitigation measures shall be installed prior to first operation of the plant and shall be permanently retained for the lifetime of the development</p>                                                                                                                                               |

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|    | <p><b>Reason:</b> in the interests of residential amenity and to ensure the details are acceptable to the Local Planning Authority having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 37 | <p>No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.</p> <p><b>Reason</b> - Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways and having due regard to policies CS11, CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.</p> <p>Note:</p> <p><i>Thus, it must be demonstrated that any proposed piling;</i></p> <p><i>a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.</i></p> <p><i>b. Nor any increased risk to drinking water supplies (including turbidity).</i></p> <p><i>c. Nor deterioration in the transmissivity of the aquifer</i></p> |
| 38 | <p>If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.</p> <p><b>Reason</b> - To ensure that risks from land contamination to drinking water supplies are remediated having due regard to policies CS11 and DM10 of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|  | Havant Borough Local Plan (Core strategy) 2011 and the National Planning Policy Framework. |
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**Informatives:**

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| 1 | <p>In accordance with paragraphs 38-50 of the NPPF Havant Borough Council (HBC) takes a positive and proactive approach and works with applicants/agents on development proposals in a manner focused on solutions by:</p> <p>Offering a pre-application advice service, and</p> <p>Updating you of any issues that may arise in the processing of your application and where possible suggesting solutions, and,</p> <p>In this instance:</p> <p>You sought and were provided with pre-application advice,</p> <p>You were updated about issues after the initial site visit.</p> |
| 2 | <p>The applicant is advised of the following in relation to the Building Regulations submissions:</p> <p><u>Informative Note</u></p> <p>Building Control should be made aware that a closed window strategy is relied upon throughout the site to ensure that guideline internal noise levels are achieved, this should be considered regarding provision of purge ventilation for the purpose of controlling overheating.</p>                                                                                                                                                     |
| 3 | <p>The applicant is advised of Consultee response from Hampshire Fire and Rescue Service which can be viewed on the Councils website at the following address: <a href="#">Planning Application: APP/25/00639</a></p>                                                                                                                                                                                                                                                                                                                                                              |
| 4 | <p>The applicant is advised of the following consultation comments from Hampshire County Council as the Highway Authority:</p> <p>S278:</p> <p>The applicant should be aware that as the proposals include the formation of a new or altered access onto the highway, which will include works within the</p>                                                                                                                                                                                                                                                                      |

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|   | <p>highway, these works will be required to be undertaken in accordance with standards laid down by, and under a Section 278 license agreement with, be submitted can the Highway Authority. Full details of how to apply and the required documents to be found via the link: <a href="https://www.hants.gov.uk/transport/developers/section-278">https://www.hants.gov.uk/transport/developers/section-278</a>.</p> <p>The granting of planning permission is independent of the license application, and it is strongly recommended the applicant understands the criteria to be met in order for a license to be granted.</p> <p>S38:</p> <p>As the proposed internal road network and primary street is to be offered for adoption, the applicant should enter into the S38 process with the Highway Authority at the earliest opportunity to finalise the detailed design matters associated with condition 1 to ensure that the proposed development and detailed design is agreed and constructed in accordance with adoptable design standards prior to first occupation.</p> |
| 5 | <p>The applicant is advised of the following comments received from Portsmouth Water:</p> <p>Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.</p> <p>For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the standard Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings.</p>     |
| 6 | <p>The applicant is advised of the following consultation comments received from Southern Water:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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|  | <p>Southern Water has no objection to the direct surface water connection into the surface sewer at a lower restricted rate than previously arranged. The developer will need to submit an S106 application and demonstrate that the proposal provides a betterment to the network.</p> <p>At present, Southern Water has capacity for 51 units. However, please note that a sewer connection cannot be refused on the grounds of capacity constraints. Under the Water Industry Act 1991, the statutory mechanism for delivering our duties is via a Section 106 (S106) application.</p> <p>This development will discharge into the 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 (WTW).</p> <p>Southern Water will continue to work collaboratively with the developer to align build-out rates with reinforcement planning, ensuring capacity improvements are delivered in a timely manner.</p> <p>Any new connections to the public sewerage system will require a Section 106 connection application to be submitted and approved by Southern Water Services. Please note that, where there are separate systems available Southern Water will not allow surface water to connect into the public foul sewer. If this is not possible, please provide evidence that all other options have been explored.</p> <p>For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119) Website: <a href="http://southernwater.co.uk">southernwater.co.uk</a> or by email at: <a href="mailto:SouthernWaterPlanning@southernwater.co.uk">SouthernWaterPlanning@southernwater.co.uk</a></p> <p>For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119) Website: <a href="http://southernwater.co.uk">southernwater.co.uk</a> or by email at: <a href="mailto:SouthernWaterPlanning@southernwater.co.uk">SouthernWaterPlanning@southernwater.co.uk</a></p> |
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