

PLANNING POLICY CONSULTATION RESPONSE

Application No:	APP/24/00761
Site Address:	7-9 South Street, Havant, PO9 1BU
Development:	Demolish existing B8 unit, and re-construct a three and a half storey building with a B8 unit at ground floor level, with 3No apartments over (2No two bedrooms and 1No studio)
Case Officer:	Arleta Miszewska
Comments by:	Ikrame Essalih
Date of Comments:	12/02/2025

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 Havant Borough.

The following policies are of particular relevance to the proposal:

- AL3 – Town, District & Local Centres
- CS4 – Town, District & Local Centres
- CS6 – Regeneration of the Borough
- CS9 – Housing
- CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS15- Flood and Erosion Risk
- CS16 – High Quality Design
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS19 – Effective Provision of Infrastructure
- CS21 – Developer Requirements
- DM3 – Protection of Existing Employment and Tourism Sites
- DM10 – Pollution
- DM13 – Car and Cycle Parking on Residential Development
- DM20 – Historic Assets

Principle of development

The site is located within the urban area as defined by policies CS17 and AL2 in the adopted Local Plan. As such there is a presumption in favour of sustainable development subject to other considerations.

The site is located within Havant Town Centre and is currently used as a workshop storage unit sited behind a couple of shop units fronting onto South Street. The site itself is accessed between No. 9 and No. 11 South Street which provide an active ground floor frontage.

It is understood that the current ground floor use as a storage unit for MobileWeld (falling within Class Use B8 of the Use Class Order) would be retained, albeit with a small net loss of floorspace (25 sq. m). Nevertheless, the proposals would retain an existing employment site, and a policy conflict with Policies CS2 and DM3 would not arise.

Flooding

The site is mainly located within fluvial Flood Zone 1. However, its South Street frontage and significantly the main access is located within Flood Zones 2 and 3 according to Environment Agency mapping. The Council's Strategic Flood Risk Assessment modelling does not indicate that there is additional future risk.

It is acknowledged that pre-application advice suggested that a sequential test would be required. The applicant has not provided a sequential test. Regardless of the earlier advice, given the very limited site area considered to be at risk, and taking into account guidance in paragraph 3.1 of the Council's sequential test guidance, it is accepted that no such test is required.

The applicant has, however, provided a site-specific Flood Risk Assessment, which includes commentary on the exception test. The exception test, as per paragraph 178 of the NPPF requires that it is demonstrated that:

- (a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- (b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall

With regard to part (a) the arguments put forward in paragraph 6.4 of the applicant's FRA, taken together with the Council's encouragement of regeneration of the town centre through policy CS6 of the plan, are considered to satisfy this test.

With regard to part (b) the FRA appears to demonstrate that development will be safe for its lifetime, including a consideration of climate change conditions. In arriving at this conclusion, it is noted that mitigation measures are proposed as part of the FRA including the provision of all living accommodation at first floor level and above, and the Environment Agency raises no objection to the proposal.

Heritage

Whilst the existing building is not listed, the development site lies within St Faiths Conservation Area with several listed buildings located within the vicinity of the site. As such due care and consideration should be given to the protection of such assets

It is noted that the Council's Heritage Officer has concluded that the proposed building is not considered to result in harm to the significance of the conservation area, not the nearby listed buildings, subject to agreement of further materials conditions to be secured via condition.

Density

Policy CS17 of Havant Borough Local Plan (Core Strategy) sets out that development will be permitted where it makes the most effective use of land. Similarly, Policy CS9 also supports residential proposals which achieve a suitable density for the development's location, taking into account accessibility to public transport and proximity to employment, shops and services in addition to respecting the surrounding landscape, character and built form.

The proposed scheme comprises 3 residential flats and a storage unit combined in one building located on a site of approximately 125.5 sqm (equivalent to 0.13 hectares); this would indicate a residential density higher than 80 dwellings per hectare with the application site located within

the Havant Town Centre identified by the Council's Residential Analysis within which a minimum of 80 dwellings per hectare is considered appropriate.

On this basis it is considered that the proposals secure an appropriate density and would make an effective use of land.

Design

Both the adopted and emerging local plan require high quality design in all development under policies

- CS16 High Quality Design (Core Strategy)
- Havant Borough Design Guide

Parking

It is noted from the submitted plans and Design and Access Statement that No1 parking space is allocated for the retained B8 storage use while there are no car parking spaces proposed to be allocated for the residential use.

The Council's Parking SPD recognises that zero parking development schemes could be considered suitable in Havant Town Centre if supported by appropriate evidence (see paragraphs 3.05-3.07). In this respect, the submitted Design and Access Statement notes the highly accessible location of the site within the town centre, and the availability of public car parking nearby . It does not however, reference the accessibility to shops and services and accessibility to public transport. The site is however, clearly within walking distance of the bus station and the railway station.

Conclusion

With consideration of the additional information submitted in respect of flood risk, the principle of development of this site is acceptable in policy terms subject to other material considerations.