

PLANNING POLICY CONSULTATION RESPONSE

Application No:	APP/24/00267
Site Address:	36 Rownhams Road, Havant, PO9 4QB
Development:	Demolition of existing single storey garage and erection of a two bed, two storey dwelling
Case Officer:	JL
Comments by:	JB
Date of Comments:	12 August 2024

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 Council has also adopted a [Housing Delivery Position Statement](#), which is a material consideration in the determination of applications.

Principle of development

The proposal site is a previously developed site within the urban area (policies CS17/ AL2). The principle of development in this location is therefore supported in policy terms. This is strengthened further by the fact that the Council is not able to demonstrate a 5 year housing land supply.

The scheme has the potential to contribute, albeit very modestly, to the supply of housing. This must be given some weight in decision making, while noting that the lack of 5 year supply does not indicate that planning permission should automatically be granted for development which would boost housing supply. Rather, permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Flood Risk

On this particular site, whether the proposal is acceptable even in light of the above, hinges on whether the risk of flooding has been satisfactorily addressed. The applicant has noted correctly that the site is identified on the Environment Agency's mapping as being at risk of fluvial flooding, and has submitted a Floor Risk Assessment document. However, this is non-technical in nature, and it is suggested that it does not contain sufficient detail to conclude that the development would be safe. For example, it states that floor levels will be raised, but no information is provided as to the potential flood levels and the floor levels.

The FRA document also contains sections entitled Sequential Test and Exception Test, yet these do not include relevant information to satisfy those tests. The sequential test, which must be passed before the exception test is considered, requires the applicant to demonstrate that there are no alternative suitable sites at lower risk of flooding (i.e. in FZ1) for the proposal development (i.e. a single family dwelling) elsewhere in the borough. This has not even been attempted.

On the basis of the information provided, it is considered that national and local policy (Chapter 14 of the NPPF and the Flood Risk PPG and Policy CS15 of the Core Strategy) on development and flood risk has not been satisfied. A policy objection arises to the proposal on this basis.