

Aura House, New Road, Havant

Planning Statement

Prepared on behalf of Gary Robinson

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Contents

1.Introduction.....	1
2. The Site and locality.....	2
3. Planning History	3
4. The application Proposals	4
5. Planning Policy context.....	5
6. Key Planning Considerations	12
7. Summary and conclusion.....	22

Appendices

- a) Dated evidence of marketing the office
- b) Letter from AJ Knight lettings and sales Ltd
- c) Email from Hellier Langston

1. Introduction

1.1 WYG has been instructed by the applicant, Gary Robinson, to prepare a Planning Statement to support a full Planning Application to Havant Borough Council (HBC). Planning permission is sought for the change of use of the Offices at Aura House (Use Class B1) to 6 residential flats (Use Class C3), with parking and associated external changes to facilitate the change of use.

1.2 The Planning Statement analyses the application site and surrounding area, sets out the planning history and planning policy context. The statement demonstrates why the proposed development is appropriate in relation to key planning policy, technical and environmental considerations.

1.3 Considering the constraints of the site, the validation requirements and the pre-application response, the application is accompanied by the following documents:

- Application Form
- Cover Letter
- Site Location Plan
- Block Plan
- Existing and Proposed Elevations
- Existing and Proposed Floor Plans
- Noise Assessment – Prepared by Sounds Advice Acoustics Ltd.
- Marketing evidence over the past 12 months (Appendices A – C)
- Letter from AJ Knights Lettings and Sales Ltd.
- European Site avoidance and mitigation checklist

2. The Site and locality

2.1 The site is located within the jurisdiction of Havant Borough Council and is sited in a highly sustainable location, located within the urban edge, surrounded by existing residential development.

2.2 The site is roughly triangular, situated immediately south of New Road and north of the Railway. The site is located in a predominantly residential area with the majority of New Road being formed of 2 storey houses, including to the immediate north-east. The site is situated in a sustainable location with access to a range of services that help meet the day to day needs of local residents. The site is located in close proximity to the Bedhampton Community Centre, Bedhampton Bowling Club, a car garage, Pharmacy, Barbers, a number of takeaways and a church. The site is well served by public transport links, including quick access into Havant Town Centre. There are a number of bus stops located on New Road and Bedhampton Road and Bedhampton Train Station is directly west of the site. The site is located close to publicly accessible areas of open and green space in addition to a number of attractive public rights of way.

2.3 The application site has no overriding constraints, being located outside of the Conservation Area, Green Belt and located in Flood Zone 1, the lowest risk of flooding. The site is shown edged red on the accompanying Site Location Plan and extends to 0.05ha.

3. Planning History

3.1 The existing building was granted planning permission as an office initially in 2003, this was later renewed in 2008 under planning application reference 08/60233/011. The site has been subject to a number of planning applications over the last 12 years, mostly relating to small scale extensions. The most recent application was approved in March 2019 for the 2 storey extension to create additional separate individual office space, however this has not been implemented. It should be noted that this approved extension will be implemented as part of this change of use application, should it be approved. For the purposes of the CIL form, the proposed m2 from approved application (APP/18/00449) has been included.

3.2 The Council refused planning permission for the provision of residential development on this site in 2010 and 2012 (10/00890 and 12/00736). Both applications were subject to appeal (APP/X1735/A/11/2153015 and APP/X1735/A/13/2191295). Concerns were raised in relation to future residents being subject to a harmful level of noise from the railway. The inspector concluded that although the site was in a noise sensitive location, mitigation measures such as special glazing and ventilation could deal with this to an extent where residents would not be subject to an unacceptable level of noise. However, in this case, the Inspector was concerned that the proposal did not provide a useable amenity space.

Pre-Application Advice request

3.3 A Pre-Application Advice request was submitted to the Council for the proposed change of use and extension to 5 residential units in November 2019. A meeting was also held with the Council which discussed the business demand. The advice received in February 2020 highlighted that the principle of development was acceptable. However, the main considerations related to the loss of a business use in this location and the potential noise impact for future residents given its proximity to the railway.

3.4 The Case Officer noted the following aspects to be the main planning considerations for the proposal:

- Principle of Development
- Loss of business use
- Living Environment for future residents - Noise Issues and space standards
- Impact on neighbouring residents
- Parking
- Nutrient Neutrality;
- Developer Contributions

3.5 This Planning Application has considered the previous planning history and pre-application advice which has fed into the formation of the proposals for this site. This is evidenced through the design and layout of the proposals and the submission of a noise assessment and dated market evidence. A more detailed analysis of this has been provided in sections 4 and 6 of this report.

4. The application Proposals

Description of development: Change of use from Offices (Use Class B1) to 6 residential flats (Use Class C3) with parking and associated external works to facilitate the change of use

4.1 As discussed above, this application has addressed previous concerns and comments raised by the Council and Inspector to form a proposal which is acceptable.

4.2 The application site is located within the urban edge and built up residential area where the principle of development is acceptable. The statement details how the proposed development can be found acceptable, demonstrating compliance with identified national and local policies as highlighted in section 5. More specifically, it will be demonstrated how the loss of this small office space is not harmful and that future residents would not be subject to an adverse level of noise.

4.3 The Council noted that the acceptability of residential development in this location will be informed by achieving good acoustic design. In light of this, a Noise and Vibration assessment

has been submitted alongside this application in compliance with BS 8233:2014. The applicant has also carried out a 12-18 month marketing exercise in compliance with Policy DM3 as demonstrated through the attached appendices.

4.4 The proposals have sought to address particular aspects of the development that were previously cause for concern. Considering this, the proposals have done the following:

- Demonstrated that the loss of the office use is not harmful
- Illustrated that the office is no longer fit for purpose, including market evidence
- Confirm future residents are not subject to a harmful level of noise without compromising the quality of life of residents

5. Planning Policy context

5.1 This section sets out the key relevant planning policy at national and local levels, section 8 sets out how the proposals accord with these policies. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. This section will firstly note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposals for the site. Section 8 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan as a whole and material planning considerations.

National Planning Policy Framework and Guidance

National Planning Policy Framework

5.2 The most recent National Planning Policy Framework (NPPF) was published in February 2019 and establishes a presumption in favour of sustainable development. Paragraph 2 states that the NPPF is a material consideration in planning decisions.

5.3 Paragraph 8 confirms that there are three dimensions to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing

required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment).

5.4 Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area.

5.5 Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to date development plan.

5.6 In terms of determining applications, paragraph 38 sets out that it is a requirement that local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.

5.7 Paragraph 20 relates to strategic policies where it is set out that these policies should make sufficient provision for: Housing (including affordable housing), employment, commercial development and infrastructure.

5.8 Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise, including whether the policies of the local plan are up-to-date. It encourages that decisions on applications should be made as quickly as possible.

5.9 Paragraph 54 of the NPPF states that conditions can be used to make a development acceptable, where it might otherwise be unacceptable, however, these should be kept to a minimum and only imposed if necessary.

5.10 Section 5 on housing sets out that the Government is committed to 'significantly boosting the supply of homes (paragraph 59)' in order to meet local needs and help make sure that land with permission is developed without unnecessary delay. This includes the provision of new affordable housing on large sites to meet local needs.

5.11 Section 8 relates to promoting healthy communities and states that planning decisions should plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

5.12 This means where sites have good access to existing public transport, such as busses, railway stations and the strategic road network, new development should be considered which maximises these opportunities. It states that proposals should facilitate access to high quality public transport.

5.13 Section 11 relates to making the most effective use of land to make sure that decisions meet the need for housing as effectively as possible whilst improving the environment and making safe and healthy communities.

5.14 Paragraph 180 notes that decisions should take into account likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

5.15 Paragraph 181 Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

5.16 Paragraph 182 states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and

facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

National Planning Policy Guidance (NPPG)

5.17 Planning Practice Guidance (PPG) was published online in March 2014, with periodic updates occurring as national policy is changed or refined. It advises that:

"The National Planning Policy Framework represents up-to-date Government planning policy and must be taken into account where it is relevant to a planning application or appeal. If decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed. A development that is consistent with the National Planning Policy Framework does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise"

5.18 The Guidance advises that the statutory development plan is "the plan for the future development of an area" It consists of:

Local plans: development plan documents adopted by local planning authorities, including any 'saved' policies from plans that are otherwise no longer current, and those development plan documents that deal specifically with minerals and waste.

Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

5.19 Paragraph 005 of the noise section of the PPG notes that when noise is not perceived to be present, there is by definition no effect. As the noise exposure increases, it will cross the 'no observed effect' level. However, the noise has no adverse effect so long as the exposure does not cause any change in behaviour, attitude or other physiological responses of those affected by it. The noise may slightly affect the acoustic character of an area but not to the extent there is a change in quality of life.

5.20 Paragraph 010 references the different mitigation measures a new development can incorporate to mitigate noise. These include, engineering, layout, insulation and also the use of planning conditions.

Local Planning Policy

5.21 The application sites falls within the jurisdiction of the Havant Borough Council (HBC) where the development plan comprises of the Local Plan (Core Strategy) adopted March 2011 and Local Plan (Allocations) July 2014. HBC have also adopted a number of separate Supplementary Planning Documents (SPD) which form a material consideration in the determination of the application.

Emerging Local Plan

5.22 HBC commenced work on the new Local Plan (2036) in 2016, the Pre-Submission Local Plan 2036 was approved by the Full Council on 30th January 2019. However, this has not yet been adopted and therefore have no weight at this time in accordance with paragraph 50 of the NPPF.

The position of Havant Borough Council- 5 year housing land supply update (December 2019)

5.23 The December 2019 update stated that the Borough is required to deliver 486 dwellings per annum. The Council state that they are able to demonstrate a 5.4 year supply of housing. The Government have recently published the new standard method for calculating housing requirement (August 2020) which will increase the Councils requirement to 963 dwellings per annum. Although this has not yet been formally adopted, this demonstrates the Government's commitment to boosting housing supply

Nutrient neutrality

5.24 On Wednesday 26 June 2019, Havant Borough Council's Cabinet approved the Position Statement on Nutrient Neutral Development. This puts in place mechanisms for development to achieve nutrient neutrality.

5.25 It is understood that the Council would prohibit the occupation of the flats until a specified action has been taken in relation to an avoidance and mitigation package has been agreed. This would be via water efficiency conditions and a financial contribution, this is known as the Warblington Farm Mitigation Scheme, this is detailed further in section 6.

Havant Borough Core Strategy- March 2011

5.26 The following local policies are considered of most relevance to the proposed development, those highlighted bold are those which were referred to by the Council during the Pre-Application advice:

- Policy CS2- Employment
- Policy CS9- Housing
- Policy CS14- Efficient use of resources
- Policy CS15- Flood and erosion risk
- Policy CS16- High Quality design
- Policy CS17- Concentration and distribution of development within urban areas
- Policy CS20- Transport and access strategy
- Policy CS21- Developer requirements
- ***Policy DM3- Protection of Existing Employment and Tourism Sites***
- Policy DM8- Conservation, protection and enhancement of existing natural features
- Policy DM13- Car and cycle parking on residential development
- ***Policy DM18 Protecting New Development from Pollution***

5.27 The Council also relied upon un-adopted policies during the pre-application advice with reference to policies C1 and H1. However, as noted above, these cannot be given any weight.

Borough Design Guide SPD (2011)

5.28 The SPD sets out the Council's design expectations for new development and supports Policy CS16. It aims to guide new development so that it responds positively to the character and special qualities of the Borough. It provides details on massing, height, and site context and notes that new development should be of a sustainable design. The SPD also notes that an adequate level of external amenity space should be sought, but that this is not always achievable and is dependent of site context.

Housing SPD (2011)

5.29 This SPD states that the Council are required to deliver 6,300 homes within the Plan Period. It aims to meet housing need within the borough and details the expected level of affordable housing. It should be noted that since the SPD adopted, the Council are required to provide 11,250 between 2011-2036.

Other relevant Havant Borough Council Planning Documents

5.30 Finally, the following documents are also considered to be of relevance to the proposed development:

- HBC Parking (2016, partially updated 2019)

5.31 All of the national and local policies identified above have been carefully considered developing the proposals for this site. The following sections will demonstrate why, in consideration of these policies and other material considerations, the proposals that form this Planning Application submission should be supported.

6. Key Planning Considerations

6.1 This section will demonstrate that the site provides many benefits and contributes to delivering other adopted policy objectives, this section also details how the proposal has addressed previous reasons for concern.

Principle of development

6.2 The site is located within the urban edge and built up area where the principle of development is acceptable. The proposed siting of the development relates well to the surrounding built environment and is well served by local services and facilities, in addition to great transport links.

6.3 The Council are currently required to deliver 486 dwellings per annum, these will be directed to sustainable sites located within settlement boundaries where limited harm is caused. The development of this site, although modest, provides an important contribution to the Boroughs housing requirements in a location that is highly sustainable, ensuring the Council do not need to seek the development of sites outside of the built up boundary. Additionally, the use of this site for C3 demonstrates an effective use of the land. The provision of 6 residential flats would present an opportunity to make as much use of previously developed land, this is emphasised and further supported by paragraph 117 of the NPPF.

6.4 Furthermore, the Government have recently published the new standard method for calculating housing requirement (August 2020) which will increase the Councils requirement to 963 dwellings per annum. Although this has not yet been formally adopted, this demonstrates the Government's commitment to boosting housing supply.

Loss of Business use

6.5 As identified within the Pre-Application response, the most relevant local plan policies relating to employment floor space for the determination of this Planning Application are CS2 and DM3, these aim to protect existing employment sites that are fit for purpose. The following section demonstrates that the site is not fit for purpose and that the change of use to residential flats would not significantly or negatively affect the Councils Employment land objectives.

6.6 In order to determine whether the loss of existing office space is acceptable, it is important to understand the Councils existing and proposed Employment land provision. As part of the Local Plan update, HBC have instructed Lambert Smith Hampton to produce an Employment Land Review for the borough. This document assesses both the existing and future need for sites or developments that provide employment floor space. This document is dated March 2020 and can be considered accurate and relevant to the determination of this planning application.

6.7 The Employment Land Review (March 2020) states that there is an identified need of 86,919m² of employment floor space for the Borough and that there is a supply of 151,914m². This concludes that there is a surplus of approximately 60,000m² of the potential employment land available over and above the Borough's floorspace requirements during the plan period. Sites such as Dunsbury Park, Langstone Technology Park and Solent Road North provide a large proportion of this.

Insert 1: Analysis of HBC Employment floorspace

Analysis of HBC Employment floorspace	
Requirement:	86,919 m ²
Provision:	151,914 m ²
Surplus:	64,996 m²

6.8 . The proposals would result in the loss of 241m² office space, when this is considered within the context of a 64,996m² surplus, there is not any adverse harm. Furthermore, there is an evidenced lack of demand borough wide and this site specifically. The report produced by Lambert Smith Hampton states that the Borough has been identified as a secondary office location, due to the lack of credible demand for high quality office space and absence of high quality profile occupiers. It goes on to state that the borough has seen virtually no speculative office development in recent years.

'...reflecting that the fact the Borough has a relatively weak office market'

6.9 The employment land review notes that the need for office space has been static. It is understood that there is still some demand in higher profile areas as those listed above, however, this is simply not the case with the application site in question. The site was not previously safeguarded for employment use and neither is it for the emerging local plan. Considering the surplus (insert 1), the noted and evidenced lack of demand; the loss of a small employment floor space within a predominantly residential area would not be harmful. This is further illustrated by the client's attempts to market the site over the last 12 months where there has been no shown interest.

'the Borough's employment land supply is more than sufficient to meet the identified employment floorspace requirements'

6.10 The applicant has marketed and advertised various suites within the building for the last 2 years in compliance with policy DM3 of the local plan. The applicant has had very little success and no interest has been shown. AJ Knight Lettings & Sales wrote to the applicant in November 2019 which highlighted that over the past 18 months, the demand for the office has declined significantly with people preferring bigger offices in more entrepreneurial locations (Appendix b). It should also be noted that the previous planning application to expand the office floor space was sought in the hope that it would improve the marketability of the building. As evidenced throughout this statement and appendices, this unfortunately has not been the case. Little interest has been shown despite efforts to expand the viability of the office use which further demonstrates that the office is no longer fit for purpose.

6.11 The application site has never been allocated by the Council for employment use and this is still the case with the emerging Local Plan. This demonstrates that the Council have not identified the application as a site of economic or employment importance. The site only became a B1 use following a speculative planning application in 2003. Therefore, it is not appropriate for the Council to retain this site for designated employment use, this is further emphasised within paragraph 182 of the NPPF. Therefore, the site cannot justifiably be retained as an office and there is no evidence that the loss of this small office space would be harmful.

6.12 The Council should seek to make the most efficient use of land, delivering housing in a sustainable location, considering the other material benefits being provided. It has been demonstrated that the site is no longer fit for purpose in compliance with policy DM3. It has also been illustrated that the refusal of residential development on this site due to the loss of an employment use would not be justified or informed.

Impact of Covid-19

6.13 The Covid-19 pandemic has had a considerable impact on the need for office space which has led to organisations nationwide re-structuring and re-thinking the way they work. In many cases, this has become a long term commitment. These current circumstances need to be considered by the LPA and should not be disregarded when determining the designation and retention of office space through the preparation of local plan policies and decisions on planning applications. We have already seen some recent changes to planning legislation during the covid-19 pandemic in relation to permitted development rights for changes of use for restaurants, cafes and drinking establishments.

6.14 It is appreciated that these are new circumstances, however, it is important to recognise that the less than optimistic stance of achieving B1 occupants before the pandemic will have regressed further where the demand has dramatically decreased. This downward trend is likely to continue.

Noise

6.15 The Pre-Application advice noted that there is a potential for future residents to be impacted by noise and vibration from the railway south of the application site. The Case Officer and Environmental Health team did not object to the proposals; but noted the specific assessments that would need to be carried out. Considering this, Sounds Advice Acoustics Ltd have prepared a noise survey to British Standard 8233: 2014 and a vibration assessment to British Standard 6472 & 7385. The assessment concluded that the site would fall below the range of 'low probability of adverse impact' for vibration but that mitigation measures would be required for noise. As previously discussed, during appeal 2191295 the Inspector was satisfied that there could be mitigation measures that would enable the acceptable use of this site for residential development in relation to noise. It should also be noted that Class O.2 (1) (d) of the GPDO states that it is only the impact of noise from commercial premises on the intended occupiers of the development that are assessed, it does not take into account the noise of roads or railways.

6.16 With the glazing / ventilation specifications achieved within this report, the development can be implemented within the guidelines of the aforementioned documents and ensure a conclusion of NOEL – No Observed Effect Level. This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise. Furthermore, the bedrooms have been sited towards the front of the property where the noise levels are even lower.

6.17 Notwithstanding the evidence provided above which demonstrates future occupiers would not be subject to harmful levels of noise and or vibration, the whole area accommodates residential properties that back on to the railway line. This is evident with a review of the dwellings south of Wendover Road, North of Cross Way and west of Brunswick Gardens, all within close proximity of the application site and which share the same relationship with the railway line. It should also be noted that this is a relatively typical relationship within urban areas, especially those that have been identified 'as the most sustainable areas of the borough' (*Havant Borough Local Plan*).

6.18 It should also be noted that as part of the emerging Local Plan, the Council have allocated 'land end of Palk Walk' as being suitable for housing. This proposed allocation adjoins the railway line and shares the same relationship as this planning application. Please see insert 1 below, this site is less than 100m from the application site. This clearly demonstrates that the Council accept that housing adjoining the railway line is acceptable in principle and not uncommon within built up urban areas.

Insert 1: Proposed housing allocation adjacent to railway line, in very close proximity to the application site



6.19 The applicant is committed to ensuring that there is no harmful level of noise to the residents of the development area and welcomes feedback from the Council on other design features that may be appropriate. This section has responded positively to the suggestions of the Council in relation to noise and vibration and has also demonstrated compliance with Policy DM18. This policy notes that planning permission will be granted where projected levels of noise and vibration 'do not have a significant negative effect on the amenity of future occupiers. Therefore, the proposals are acceptable in this regard.

Character and appearance

6.20 The proposals do not involve any increase in size, scale or siting and there are no changes to the external materials. The proposals will include the addition of front doors and also one new window on the ground floor south-west elevation. The proposal provides a high-quality residential development that responds positively to the locality and that does not appear out of keeping. The size, scale, design and siting of the development respects the character of the surrounding area.

6.21 Therefore, the site provides a great opportunity to contribute to the delivery of housing in a location that is relatively free of constraints and that respects the surrounding built form and character of the area.

Residential amenity

6.22 Notwithstanding the comments above referring to noise, it is understood that the Council have had previous concerns relating to the proposals not providing a useable and sufficient garden/communal area. The Council's Design SPD referred to previously by the Council requires a 10m length garden for 2 storey homes. However, it is important to note that the SPD goes on to state that there **clearly may be exceptions to this rule, depending on local context.**

6.23 Considering this, the Council accept that in some cases, it will not be achievable to provide sufficient external amenity space with new developments. The proposals should be considered within the context of this statement. The omission of garden space in itself does not warrant reason for refusal. An informed decision should be made considering the context of the

application site, the nature of the development and the access to other open spaces. Each application is considered on its own merits and new development has to work within the constraints and parameters of each site. In this case, the provision of a garden area would not be appropriate, as noted by the appeal inspector during appeal 2191295. However, this is not uncommon nor out of character with residential flats, especially within built up urban areas. It is appreciated that the building was used as an office through 2013 and therefore does not benefit from the provision of Class O of the GPDO. Notwithstanding the above, it should be highlighted that offices can be converted to residential use without the provision of external amenity space under the above section of the GPDO.

6.24 It is also important to recognise that the site is very well served by publicly accessible areas of green and open space. Bidbury Mead is located just 300m west of the site and Havant Park is located only 0.6km to the east. Both of these green spaces have been categorised as both suitable for recreation and tranquil and have been protected through the Council's 'Local Green Spaces and Destination Open Spaces in Havant Borough' (December 2018) which demonstrates that they are of a high quality and will be available to future residents in perpetuity. Additionally, Public Right of Way 506b is located off New Road and provides residents with an attractive riverside walk surrounded by green space which later leads to Leigh Park, another designated open space. During Appeal 2191295, the appeal inspector noted that although efforts had been made to provide an external amenity area, this would not be of a good enough quality due to its siting next to the railway. Considering this, the proposals do not try to provide a garden area that is not fit for purpose, but rather highlight the publicly accessible amenity areas in close proximity to the site in addition to illustrating that it is common for residential flats developments to not provide a garden in built up urban areas. Future residents would have excellent access to open and green spaces within close proximity to the site which would provide the opportunity for relaxation and recreation whilst promoting healthy lifestyles.

6.25 The closest residential property is No.2 New Road, west of the application site. As previously discussed, the proposals do not result in any additional size, scale or mass. Therefore, the proposals have no impact on the adjoining occupier through a loss of light or overbearing impact. The proposals include the addition of only 1 window, at ground floor level which faces the railway. Therefore, there would not be a harmful level of overlooking or loss of privacy to neighbouring occupiers.

Highways and access

6.26 The proposed access is located on the north west boundary off New Road. The siting of this access has previously been found acceptable by the Council and Appeal Inspector. The proposal provides an adequate level of off street parking and cycle storage in compliance of the Parking SPD and policy DM13.

6.27 The siting of the proposed access is therefore not considered to have a significant increased risk to highways safety and or operation. Good levels of visibility can be achieved for both vehicles, pedestrians and cyclists.

Nitrates

6.28 On Wednesday 26 June 2019, Havant Borough Council's Cabinet approved the Position Statement on Nutrient Neutral Development. This puts in place mechanisms for development to achieve nutrient neutrality. For development on sites currently used for agricultural purposes, there must be an aim to achieve nutrient neutrality on-site. However, for development on non-agricultural sites (such as this planning application), particularly brownfield sites, this is not possible.

6.29 The Position Statement sets out how development proposals should consider the issue. As part of the information needed to determine relevant planning applications, a European Site avoidance and mitigation checklist will be required. This has been submitted alongside this planning application. It is understood that the Council will seek water efficiency conditions and potentially prohibit the occupation of the flats until it has been demonstrated that no more than 110 litres of water per person per day shall be consumed within the development and that these measures have been installed. The Council also provide the Warblington Farm Mitigation Scheme. This is an off-site mitigation scheme where a financial contribution is agreed via a Unilateral Undertaking, this will be agreed throughout the application process and with further advice with the Council.

Ecology

6.30 Overall, the site has been assessed as having no overriding nature conservation constraints that would preclude the development of the site and that the development of this site.

Environmental sustainability

6.31 The proposed development aims to protect the environment through sustainable design and the size of the flats and proposals comply with the national described space standards. The development can comply with regulations for water consumption standards of a maximum of 110 litres per person per day, including external water use; a condition to this effect can be attached by the Council.

Developer Contributions

6.32 The proposals are CIL liable and the application will comply with the Council's Charging Schedule. The site is also subject to financial contributions in relation to the Solent Recreation Mitigation Strategy.

7. Summary and conclusion

7.1 WYG has prepared this statement in support of the Planning Application for the change of use of the offices at Aura House to 6 residential flats to Havant Borough Council. This statement has demonstrated that the principle of development is acceptable and that the previous concerns relating to impact of noise on future residents, loss of business use and living quality/access to external amenity area have been addressed and can now be found acceptable.

7.2 The Planning Statement and accompanying documents have demonstrated that following mitigation measures there would be No Observed Effect Level (NOEL) in relation to noise and vibration where there is no detectable effect on health and quality of life. The omission of a garden area for this type of development is not uncommon, especially within one of the most sustainable locations in the borough. Future residents would have access to public open and green spaces and PUBROWs of high quality and tranquil character within close proximity of the application site. It has also been evidenced that the Council have a 64,996m² surplus of employment floorspace, where the loss of 241m² as a result of these proposals would not have a significant impact. It has also been illustrated that the site is not a sought after location for employment or business uses, this was reinforced by the Employment Land Review March 2020 document that has been used to inform the emerging local plan. It has been concluded that the change of use would not be harmful and the site cannot justifiably be retained as an office use. Paragraph 182 of the NPPF states that existing business facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

7.3 Overall, it is concluded that the proposed application represents an appropriate form of development that would respond to the aims and objectives of national and local planning policies identified in section 5 whilst also making an important contribution to the Councils' requirement to deliver 486 dwellings per annum and demonstrate a robust 5 year housing land supply. The statement has also demonstrated that the previous reasons for refusal relating

to noise and residential amenity have been addressed, as well as the comments received by the Council through the Pre-Application. The site is located in a highly sustainable location and that it represents sustainable, high quality development in accordance with NPPF and the aspirations of the local and should be supported.

Appendix A- Dated evidence of marketing the office

Various Adverts over previous 12 months

Active ad (1)

Active Ads

Live ⓘ



Office to rent near Havant

Havant

£495

Last posted 1 month ago | Ad ID: [1354530456](#) | Views: 103 | Appeared in search: 3245 | Replies: 5 | Times bumped up: 0

 Edit

Promote

Expired ⓘ



Office to rent in Havant

Havant

£495

Last posted 3 months ago | Ad ID: [134921775](#) | Views: 159 | Appeared in search: 10131 | Replies: 0 | Times bumped up: 0

 Edit

Promote

Expired ⓘ



Office To Rent – Havant

Havant

£495

Last posted 7 months ago | Ad ID: [1334702459](#) | Views: 242 | Appeared in search: 23233 | Replies: 5 | Times bumped up: 2

 Edit

Promote

Expired ⓘ



Furnished office to rent

Havant

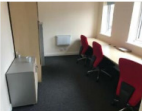
£375

Last posted 11 months ago | Ad ID: [1323634352](#) | Views: 0 | Appeared in search: 0 | Replies: 0 | Times bumped up: 0

 Edit

Promote

Deleted ⓘ



Furnished Office in Havant

Havant

£375

Last posted 1 year ago | Ad ID: [1311106687](#) | Views: 0 | Appeared in search: 0 | Replies: 0 | Times bumped up: 0

Repost

Expired ⓘ



Office in Havant to Rent

Havant

£395

Last posted 1 year ago | Ad ID: [1305312381](#) | Views: 221 | Appeared in search: 17825 | Replies: 3 | Times bumped up: 0

 Edit

Promote

The image is a collage of three screenshots from a Facebook mobile app, each showing a real estate listing for "Aura House - Offices in Havant".

- Top Left Screenshot (12 August):** The post features a main image of a two-story brick building with a sign that says "AURA HOUSE". Below it is a grid of six images showing the interior of the office space, including a reception area, a meeting room, and a kitchen. A map of Havant is also visible. The post has 11,941 people reached and is marked as a "Boosted post". The text of the post reads: "AURA HOUSE - Offices in Havant. 12 August - Havant - G". Below the post, there are buttons for "Like", "Comment", and "Share".
- Top Right Screenshot (9 June):** This screenshot shows a similar post with a main image of the building and a grid of interior photos. The text of the post reads: "AURA HOUSE - Offices in Havant. 9 June - G". Below the post, there are buttons for "Like", "Comment", and "Share".
- Bottom Screenshot (24 February 2018):** This screenshot shows a post with a main image of the building and a grid of interior photos. The text of the post reads: "AURA HOUSE - Offices in Havant. 24 February - Havant - G". Below the post, there are buttons for "Like", "Comment", and "Share".

Each screenshot also shows a "Boosted post" section with a "Write a comment..." input field and a "Boost Unavailable" button. The bottom of each screenshot shows the Facebook mobile app navigation bar with icons for Home, Search, Post, Activity, and Menu.

Appendix B- Letter from AJ Knight lettings and sales Ltd.

Mr Gary Robinson
Aura Gas
2 New Road
Havant
Hampshire
PO9 1DE

25th November 2019

RE – Aura House Commercial Units

Dear Gary,

I am writing in relation to the units above.

Over the past eighteen months or so the demand for these units has declined significantly with people preferring the bigger office sites such as basepoint, North harbour and Regus. The reason for this I believe is the better facilities available at the bigger sites.

It seems to me you may have to reconsider how these units are marketed in the future.

If you have any questions please let me know.

Regards

Andrew Jest
Director
AJ Knight Lettings & Sales

Appendix C- Email from Hellier Langston

From: Andy Hellier <ah@hlp.co.uk>
Sent: 11 December 2019 10:42
To: Gary Robinson
Subject: Aura House - Marketing

Gary

Further to our recent conversations regarding the marketing of the property you have asked me to provide an overview of interest.

We have been marketing various suites within the building over the last 2 years and have had very little success in letting the space for a number of reasons. These include the following –

Location – not an established office location.
Parking – lack of parking provided for each suite.
Shared facilities- Communal areas not desirable to potential tenants.

I hope this helps.

Andy Hellier MSc. MRICS



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Fareham

PO16 8XT

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For more information about Hellier Langston visit www.hlp.co.uk

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