



Proposed Development,
Land at 'The Coal Yard'

178A West Street,
Havant, PO9 1LR

Sequential Test Statement

28065-PD601

June 2020



pdp architecture llp



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1.0 SEQUENTIAL TEST:

1.1 Site Requirement for a Sequential Test:

The site is a windfall and situated within Flood Zones 1, 2 and 3. The southern part of the site including the access road is within Flood Zone 1, with Flood Zone 2 in the centre of the site and Flood Zone 3 the northern part of the site. The proposal is to build within Flood Zone 1 and 2, with the finished floor level of the building raised so as to be totally within Flood Zone 1. All access to the building would be in Flood Zone 1, taking advantage of the existing levels which show the southern part of the existing site to be in Flood Zone 1. Therefore the completed proposed building would have a ground floor FLL all within Flood Zone 1.

Given parts of the site are in Flood Zones 2 and 3, the Environment Agency classifies the land as a More Venerable use and the National Planning Policy Framework requires the LPA to undertake a Sequential Test to establish why this site can be developed on and why other sites not within Flood Zone's 2 and 3 are not an alternative.

1.2 Havant Housing Association Requirements:

Havant Housing Association (HHA), based in East Street, Havant, has been providing supported accommodation to tenants with specialist supported living needs across the Borough of Havant for 30 years. HHA's aim is to provide discreet, high quality accommodation within the Havant community.

Currently HHA has around 150 tenants with a variety of support needs including learning disability, mental health problems and physical disability. HHA is the largest provider of supported housing in Havant and only house single adults.

HHA's model is to have a mix of properties which support independent living for people who require a low level of support, which enables them to live full lives as members of the Havant community.

Support comes from a team of HHA staff who visit the various schemes to address tenant's requirements, generally between 9am-5pm Monday to Friday, although this may vary depending on the requirement of the tenant as for example some have work commitments or go to college and can receive support outside the usual working hours.

HHA's housing stock is located throughout the Borough, but HHA has been active in replacing older housing stock (often converted family homes) with more suitable purpose built accommodation which offers tenants 1-bed 1-person apartments with their own kitchen and bathrooms, promoting independent living.

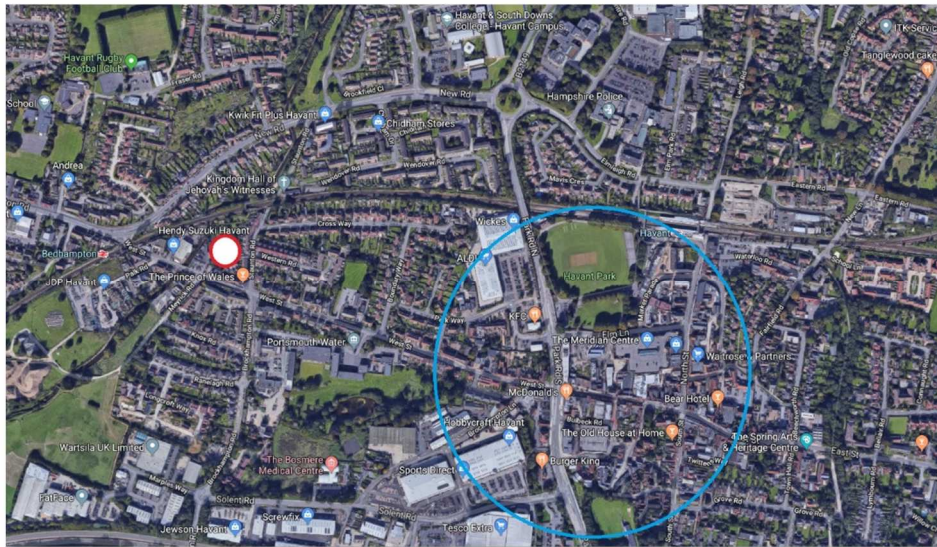
Within this programme, it is necessary for such scheme's to be located close to the amenities central Havant has to offer. For tenants to be truly integrated into the community whilst retaining their independence, they require access to shops, transport hubs and leisure/ entertainment amenities, that in the Havant area, only the town centre can fully offer.

A good example of such a scheme and location is Homewell House, located adjacent to St Faith's Church, where 14 number 1-person flats were developed partly within a listed building. With HHA's tenant's not having cars (only 1% of HHA's current tenants drive), having all the amenities close by has enabled the tenants the independence they deserve, building confidence and making them feel truly part of the local community. HHA also have a scheme at Maple House, Fairfield Road, Havant which is a 5 minute walk from the town centre.

Therefore suitable sites which meet HHA's requirements need to be within a mile radius of Havant town centre to make its amenities accessible to HHA's tenants to meet their aspirations of independent supported living and being part of the Havant community.

1.3 The Proposed Site:

The proposed site is in West Street Bedhampton and is located a 3 minute walk from Bedhampton railway station. Havant town centre, which offers a local shopping hub, bus station, Havant Park, civic centre, leisure centre and Havant railway station is a 10 minute walk from the site. Such accessibility is ideal for the placement of a scheme which meets Havant Housing Association's requirements and aspirations for its tenants as set out in section 8.2 of this statement.



*Aerial view of the site (red circle) and Havant town centre (blue circle)
The distance between the two is about half a mile (10 minute walk)*

1.4 Havant Town Centre Candidate Sites HHA Have Investigated:

Given such a defined requirement for suitable sites to meet HHA's requirements, the availability of sites is limited in being close to the town centre amenities of Havant. The opportunity to develop the Homewell House site was successful and the site was purchased, received planning approval and completed on site in December 2014.

HHA has within the last year investigated the former Street's Ironmongers site at 5-11 East Street, Havant, which is a collection of properties which was put on the market with the benefit of planning approvals for general needs housing. The number of different land owners and separate planning approvals complicated the site's potential to produce a comprehensive design which would have been able to provide enough site area to meet the requirements of 20 1-bed apartments. As an example, part of the site, 5-7 East Street was offered for sale via public auction by Nesbits in May 2019 with the benefit of a planning approval (APP/17/00061) for 6nr 2-bed and 3nr 1-bed apartments, however the site failed to sell at this auction due to the seller's unrealistic reserve price. The rest of the site is currently being demolished prior to development.



5-11 East St, Havant

HHA has also looked at purchasing the site at 44-54 West Street, Havant, situated in the precinct which had a planning approval (APP/10/00992) for retail on the ground floor and 14nr 2-bed apartments above. The land owner initially was looking for offers of circa £1m, however the site went to auction in April 2019 by McHugh & Co. Estate Agents and Auctioneers with a reserve price of £750,000, which was still considered to be above market value for the site. As a result the site did not sell at auction on the day. Reports from the auctioneer subsequently stated on their website that the site sold post-auction for a price in the region of £850,000, again a sum which would not have made a development viable for HHA's needs.



44-54 West St, Havant

A search of real estate agents websites reveals only one other site within walking distance of Havant town centre which is currently on the market which is proposing residential use and is sufficiently large enough for the proposed development. That site is Kingscroft Farm, Bedhampton. This site is being marketed for residential use referencing the emerging local Plan's 90 dwellings potential. As such this site is being marketed towards the private housing developer of which Havant HA cannot compete financially given the type of accommodation being specialist and not for profit.



Kingscroft Farm, Bedhampton



Location Plan of Candidate Sites

1.5 Allocation sites in the emerging Local Plan:

The Havant Borough Local Plan 2036 (Pre-submission draft) identifies four sites for housing development allocation that are within walking distance of Havant Town Centre. All other allocated sites within the Havant and Bedhampton area would be too remote to fulfil HHA's criteria.

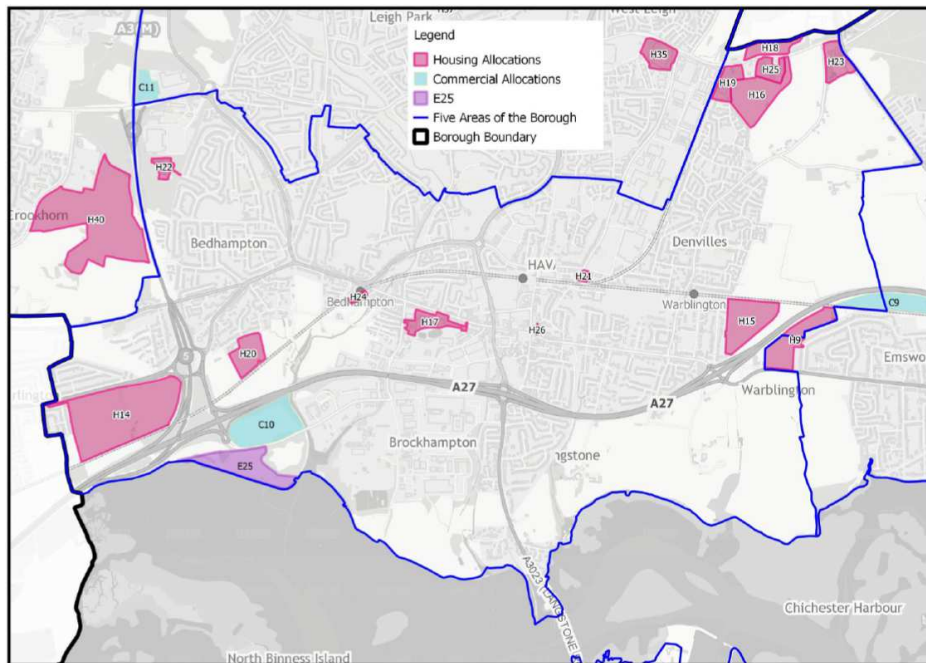
The four allocated sites close to Havant Town Centre are:

H17 - Portsmouth Water Headquarters

H21 - Wessex Site

H24 - Land at Palk Road

H26 - 9 East Street



Plan of allocated sites – Havant and Bedhampton - HBC Local Plan 2036

H17 - Portsmouth Water Headquarters – allocation 135 dwellings

At the time of the application, Portsmouth Water Company are still using the site and are still at the pre-planning stage for replacement facilities which would then free up this site to the market. Therefore the potential of this site cannot be unlocked until Portsmouth Water have relocated and the site can be put on the market, which would appear to not be in the immediate or longer term future. In addition with the potential for 135 dwellings, this is aimed towards the national house builders, not a small local housing association.

H21 - Wessex Site – allocation 41 dwellings

At the time of the application this site is currently being developed into 41 1-bed and 2-bed apartments as per planning approval APP/15/01425 and is therefore no longer available.

H24 - Land at Palk Road – allocation 15 dwellings

The allocation of this site as 15 dwellings would be too low for the proposed development. Temporary planning permission APP/17/00237 Condition 1 limits the use of the land for B8 storage until May 2023. The site is not currently on the market.

H26 - 9 East Street – allocation 11 dwellings

As detailed above the applicant did try to purchase the properties from 5-11 East Street which would have enabled a development of the 20 1-bed apartments required, however the site is split into many parts with the ownership in many different names and as a charity HHA was unable to secure a purchase at the market rates the site was being offered for.

1.6 Strategic Housing Land Availability Assessment (SHLAA) sites:

The Havant and Bedhampton SHLAA dated 25th June 2019 identifies a number of sites close to the centre of Havant town centre which have potential for residential development. The map opposite (source HBC website) shows these sites, with the orange coloured sites being discounted and the purple sites identified as requiring further assessment for development potential. The application site is shown here as HB43.

The sites identified in purple are:

HB58 is H17 - Portsmouth Water Headquarters in the emerging Local Plan

HB1 is H21 - Wessex Site in the emerging Local Plan

HB3 is H24 - Land at Palk Road

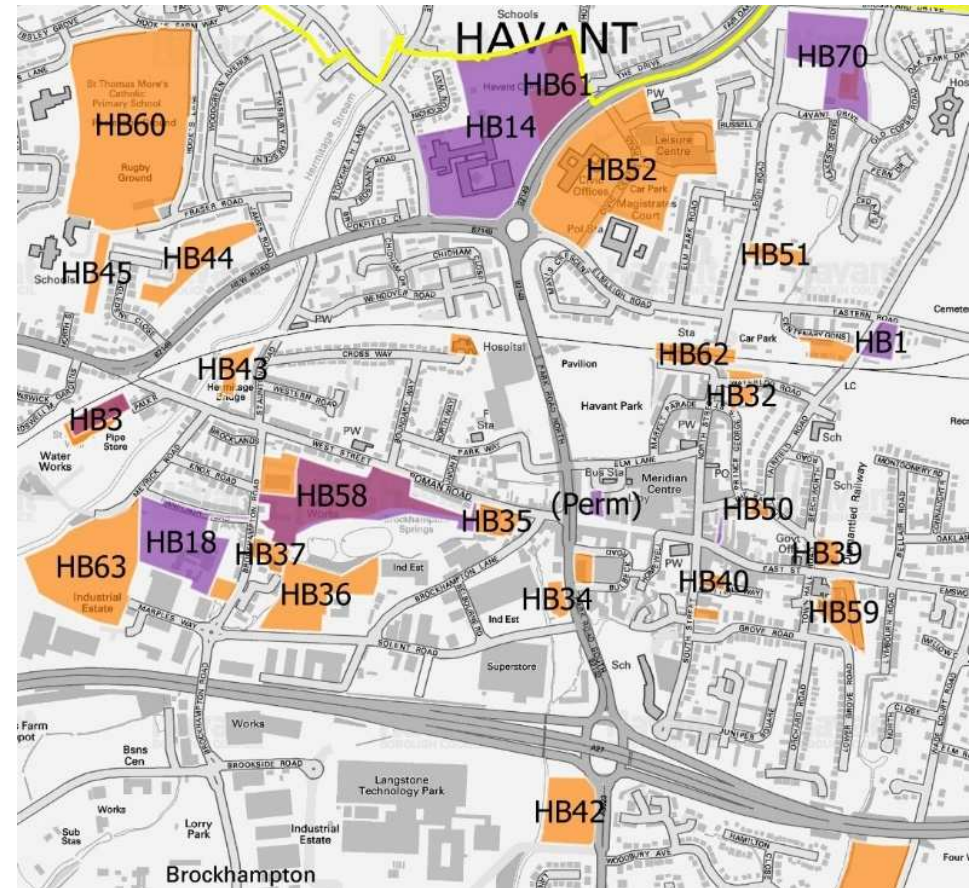
(Perm) is H26 - 9 East Street in the emerging Local Plan

HB18 is land that has been developed into residential housing via a number of planning approvals including APP/12/00772 and APP/16/00379

HB14 is Havant and South Downs College, which is still operational as a college and therefore is not currently on the market for development opportunities.

HB70 is Havant Health and Well-Being Campus which has planning approval APP/15/00303 for an 80-bed nursing home, 51 Extra Care apartments and 48 market apartments, and the planning consent has already been activated with construction due to resume shortly.

Therefore all the sites identified in the SHLAA that meet with Havant Housing Associations criteria, have either been or are being developed or assessed as per the allocated sites in section 1.5 of this Sequential Test Statement.



Havant and Bedhampton SHLAA (25.06.2019)

1.7 Brownfield Register sites:

The Brownfield Land Register provides up-to-date, publicly available information on Brownfield (previously developed) land that is suitable for housing.

Opposite is the Brownfield Map for the Havant town centre and Bedhampton area.

Most of the areas identified repeat those already explored in the Local Plan allocation sites and the SHLAA assessments in sections 1.5 and 1.6.

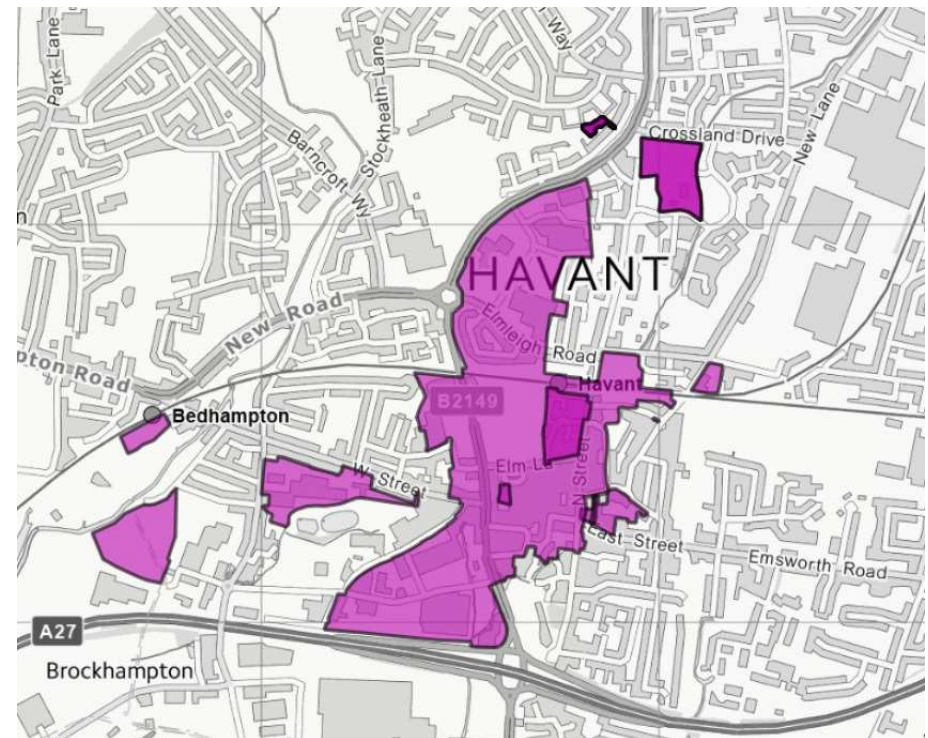
Other than the general mass of Havant town centre (which is discussed in section 1.8) the other sites the brownfield register highlights within HHA's criteria area are:

Market Parade - outline planning approval (APP/14/01225) for 36nr 1-bed and 94nr 2-bed apartments. A requirement for 30-40% of the apartments was for affordable housing which would equate to 42 apartments. Whilst the site is within HHA's required area, and could deliver the 20 1-bed apartments required, the planning approval is dated August 2016, so will have expired in August 2019 and was for as a multi-storey building with limited amenity space.

44-54 West Street (APP/10/00992) – this site is detailed in section 1.4 of this statement.

Kingscroft Farm – A proposal for 90 dwellings was presented to the Havant Developer Consultation Forum in January 2020. The proposal was for market housing, and whilst 30-40% would be required to be affordable, this would be aimed at more 'traditional' affordable housing providers as opposed HHA's specific 1-bed 1-person requirement for supported living. As such HHA's proposals would not be financially competitive with other registered affordable housing providers.

Another site which has been identified as having development potential is the Bear Hotel car park site. The Bear Hotel is still operational as a public house and hotel and the site is not currently being marketed. It is likely that if it does come on the market for development opportunities, HHA's requirements and limitations as a charity which provides bespoke accommodation would mean it could not compete with market providers who can get a greater return on their development.



Havant and Bedhampton brownfield sites

1.8 Havant Town Centre Regeneration

Havant Town Centre regeneration is part of the wider vision for Havant's future and forms part of the Local Plan to 2036.

The vision is bold and envisages largescale redevelopment of the centre of Havant including sites already explored in this statement such as Market Parade and 44-54 West Street sites.

The masterplan estimates up to 750 residential dwellings could be provided by rebuilding the area to the south of the railway station and even demolishing the Meridian shopping Centre.

As a provider of affordable homes for local people with specialist supported living needs, the project is one which Havant Housing Association would be willing to be involved with, given HHA continues to add properties to its portfolio with the aim of them being purpose built and enabling local Havant residents to be able to live and integrate into everyday Havant life.

However the masterplan vision is still very much at the early concept stage with all the sites proposed for redevelopment still being used by local and national businesses, so a delivery of such schemes is still a few years away, and when considering the current Covid-19 pandemic, is likely to be pushed further away.

HHA has a commitment to fulfil the needs of Havant people requiring supported living in the short term, so whilst HHA may be able to gain additional specialist apartments within the proposals in the future to expand the provision they already provide, that does not meet their requirement to provide it now, and as such is not a viable option at the time of this application.

By contrast the proposed application development aims to be housing people by early 2022.



1.9 Why HHA requires Havant town centre sites:

Havant Housing Association (HHA) has property across the borough of Havant but is consolidating existing housing stock, often converted from residential homes, to purpose built accommodation located close to highly accessible public amenities such as shops, transport hubs and leisure and entertainment facilities.

Havant is the only town centre hub in the Havant Borough which has:

- Shops (both local and national chains)
- Bus Station
- Main Line Railway Station
- Public Parks
- Entertainment and Leisure Centres

Havant town centre also has the main offices of Havant Housing Association where residents can drop in as part of their support, so being within walking distance of HHA's offices is a huge advantage to the support HHA can provide.

This proposal is also designed to house people local to the Havant area, so their friends and families will be in close proximity as an extra level of support in their ability to live independently. To house these people in other parts of the borough would remove them from such a support network.

1.10 Aqua Callidus Report (Exceptions Test):

A report on the Flood Risk Mitigation Strategy for the site to show how it can be developed by raising the floor levels of the proposed building and re-sculpting the northern area of the site to enable a more purposeful sacrificial flood plain can be found accompanying this planning application.

1.11 Sequential Test Conclusion:

For any other type of development, the proposed site would most likely fail a sequential test as it could be proven there were other sites available within the Borough which could meet the requirements of the applicant. However the applicant for this application, Havant Housing Association has specialist requirements to provide supported living services to allow their residents to live independent lives within the wider community. These specific needs require the development site to be within a short walking distance from Havant town centre. Given the limited opportunities for such sites in the built up area around the town centre, suitable sites are hard to come by and those which do occasionally come on to the market can often prove financially unviable given their prime location or sellers high expectation of land value.

The proposed site obviously has its constraints, which are probably why it has remained undeveloped, and why its land value makes development by HHA viable given they are a not for profit housing provider who are funded by central government grants. However, as this application shows, there are mitigation strategies proposed which will enable the developed part of the site to be raised into Flood Zone 1 levels allowing it to be safely developed and provide much needed specialist housing for people who require low level support and access to local amenities to enable them to live normal lives. The proposal also allows the northern part of the site, in Flood Zones 2 & 3 to be left undeveloped and enhanced as a meaningful flood plain, not only making the site safer, but the neighbouring properties less susceptible to flooding than is the current condition. For this reason the applicant believes such specialist requirements mean there are no other suitable sites close to Havant town centre currently available and therefore this site with this evidence passes a sequential test.