

Planning Application Response of Planning Policy

Application No:	APP/23/00851
Site Address:	The Golden Slots, 1 East Street, Havant, PO9 1AA
Development:	Partial demolition of rear outbuilding to provide alterations and extension of ground floor premises to create 4 no. supported living flats (class c3 (b)) with communal spaces, staff accommodation & refuse and bicycle storage
Case Officer:	Tina Pickup
Comments by:	Emma Chisnall
Date of Comments:	7 th March 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 the borough.

The following policies are of relevance:

- AL1- Presumption in Favour of Sustainable Development
- AL2 - Urban Area Boundaries and Undeveloped Gaps between Settlements
- AL3 – Town, District and Local Centres
- CS4- Towns, District and Local Centres
- CS9 – Housing
- CS11- Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS16 – High Quality Design
- CS17- Concentration and Distribution of Development within the Urban Areas
- CS21 – Developer Requirements
- DM7- Elderly and Specialist Housing Provision
- DM8- Conservation, Protection and Enhancement of Existing Natural Features
- DM10 – Pollution
- DM13 – Car and Cycle Parking on Residential Development
- DM14- Car and Cycle Parking on Non Residential Development
- DM20 – Heritage Assets
- DM24- Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development

Principle of the proposed development

In the Adopted Local Plan, the site lies within the urban area as defined by policies CS17 and AL2. These policies seek to concentrate development within the defined urban area and therefore the development proposals would be acceptable in principle, subject to other material considerations.

The application proposes the change of use of the Golden Slots (Sui Generis) to 4 supported living flats which will include communal spaces, staff accommodation with bin and cycle storage. This would primarily be on the ground floor of the site and result in the loss of the ground floor active frontage.

The site falls within the primary shopping frontage in Havant Town Centre as defined by Policy CS4 in the Adopted Local Plan (ALP). As such, any development would be expected to retain an active ground floor frontage.

The [National Design Guide](#) defines an 'active frontage' as: *'The front of a building with openings onto the space that generate[s] activity and engagement between the building interior and the space outside, particularly entrances.'*

Policy CS4 states *'Residential development on upper floors can make an efficient use of town centre land while adding to the mix of dwelling types and tenures available in the borough. Policy CS4 seeks to encourage high quality mixed-use development in designated centres with offices or new homes located on upper floors above town centre uses with active ground floor frontages. The loss of ground floor town centre uses to residential development will be resisted.'*

The loss of a ground floor active frontage in this location would therefore result in a policy objection in the context of Policy CS4. It is noted however that there are other material considerations and this policy conflict must be weighed carefully in the overall planning balance.

5 Year Supply

The Council's [Five Year Housing Land Supply Update \(March 2023\)](#) indicates that the Council has 1.81 years supply with a 20% buffer applied. This is below the five year supply threshold.

The lack of a five year supply triggers a presumption in favour of sustainable development, in line with paragraph 11 of the NPPF. The scheme's potential contribution to the 5 year supply must be afforded weight in the overall planning balance, albeit it is noted that this would make a modest contribution only.

Elderly and Specialist Housing Provision

Policy DM7 is of relevance to the specialised supported housing provision, and requires the following criteria to be met:

- 1. It is demonstrated that appropriate levels of on-site amenity space are accessible for residents' use which provides a satisfactory outlook for all residents.*
- 2. A setting for the building is provided which is in keeping with the surrounding area.*
- 3. Sufficient space for servicing is provided.*
- 4. Services that may generate noise and disturbance (such as laundry rooms, kitchens and refuse storage) are located and designed to avoid undue disturbance to the amenities of neighbouring properties.*
- 5. The development would not result in a concentration of such uses in one of the five areas of the borough or an over-concentration within each of these areas.*

In particular, it is questionable whether criteria 1, 2 and 3 could be met given the constrained nature of the site. It will also be of relevance to consider whether any services would be likely to give rise to disturbance to neighbouring residents and this is addressed in detail below.

Other Material Considerations

- The site comprises a former public house which is Grade II listed and lies within the St Faith's Conservation Area, with various listed buildings nearby. Therefore policies CS11

and DM20 apply, in addition to Policy CS16 which requires high quality design in all development. The Council's Heritage Officer has noted that there has been some visible deterioration in the building's condition and that a new residential use would secure its future longevity. However, further details are sought to understand whether the proposals are likely to be harmful to the significance of the main heritage asset.

- Policy DM13 and the Havant Borough Parking SPD (September 2019) set out the parking standards for new residential development in the borough. Given the specialised nature of the housing provision, consideration should also be given to the parking requirements of staff and visitors.
- It is noted that any conversion to residential would have the potential to have an adverse impact on any neighbouring properties as well as prospective residents living in the units themselves. Policy DM10 would require any such impact to be acceptable on the future occupiers and neighbours. The Council's Environmental Health Team should be consulted on any detailed plans and layout. It is noted that comments have been received.
- Limited information is provided and it is not clear what amenity space is being provided by the proposal. The Borough Design Guide expects new dwellings to achieve a minimum 10m garden depth and for the space to be private.

Conclusion

The loss of an active frontage within the primary shopping area would mean that a policy objection would arise in the context of Policy CS4. However, it is also noted that the residential use would secure the future longevity of a heritage asset in a prominent town centre location.

In addition, a modest contribution would be made towards the Council's 5 year housing supply in a sustainable location.

There are other considerations that need to be addressed by the applicant, notably that of the details sought by the Heritage Officer. This will be key in demonstrating that the development proposals would secure the appropriate use of the heritage asset in the long term, which would offer substantial benefits. In turn these will need to be weighed carefully in the planning balance with the harm arising from the loss of the active ground floor use.