

DELEGATED OFFICER REPORT

Site Address: Park Road South, 2-14 and 41-49 West Street, Havant
Proposal: Prior Approval for development consisting of works for the construction of new dwellinghouses immediately above the topmost storey on a terrace building for Part single-, part two-storey extensions to the existing terraced commercial buildings, comprising 24 residential apartments (Use Class C3), including the construction of external staircases and refuse / cycle storage.
Application Type: Prior Approval - dwellings/terrace/mixed
Application No: APP/25/00544 Expiry Date: 27/08/2025
Applicant: Brockhampton Developments
Agent: Mr J Russell Case Officer: Lesley Wells
 CPC Planning Consultants
Ward: Bedhampton

Recommendation: Refuse

1 Site Description

- 1.1 The site of 2-14 Park Road South and 41-49 West Street lies on the west side of Park Road South and the junction with West Street. The site also lies to the south and east of the Black Dog Conservation Area.
- 1.2 The existing commercial premises located at ground level in respect of the application all fall under Use Class E, and comprises of: hairdressers, employment services, various shops, and a café / tearooms.
- 1.3 All of the first floor accommodation currently falls under commercial use which comprise of offices, which also falls under Use Class E.
- 1.4 The Property itself is late 20th Century and is almost entirely comprised of red facing brickwork with rendered / glazed / UPVC shop fronts, save for 12 Park Road South which is faced with ceramic tiles. A concrete coping stone runs across the top of the Property, which has a flat roof. Much of the ground floor features glazed / UPVC shopfronts, the upper floors feature white UPVC windows. On the corner of the Property, at 39 West Street, is a branch of Domino's Pizza which is different in character from the rest of the terrace insofar as it is comprised of facing concrete and is largely glazed at both ground and first floor levels. Domino's Pizza is not included in the application.
- 1.5 The site lies within Flood Zone 2 and 3.

2 Planning History

07/72673/000 - Change of use from shop (Class A1) to Retail Bank (Class A2)., PERM,12/12/2007
08/72673/001 - Installation of new shop fronts. 1No. TTW ATM and 1No. business pay-in machine. Installation of external roof mounted air handling unit., PERM,28/03/2008
08/72673/002 - Display of 2No. internally illuminated fascia signs. 2No. internally

illuminated projecting signs. Several illuminated Modular Window Marketing units and ATM/cash withdrawal surrounds to front elevations., PERM,28/03/2008
08/72673/003 - Application for removal or variation of Condition 2 of Planning Permission 08/72673/001 for requirement of a new barrier to be removed and replaced with a pavement 'Safety Zone' adjacent to the machines and formed by a change in surface material. , PERM,08/08/2008
10/74378 - , UNK,
APP/10/00990 - New manually operated swing doors on east elevation. , PERM,07/02/2011

APP/14/00372 - Change of use of first floor from mixed use A2 and B2 to use class D2., WD,30/05/2014

APP/18/01234 - Change of use from a former bank (Class A2) to a hot food takeaway (Class A5); installation of extraction/ventilation equipment and other external alterations (resubmission of application ref: APP/18/00706). , PERM,28/01/2019
APP/19/00135 - Display of 2No. internally illuminated Fascia Signs and 1No. internally illuminated Projecting Sign., PERM,29/03/2019

APP/23/00146 - Variation of Condition 4 of Planning Permission APP/18/01234 (Change of use from a former bank (Class A2) to a hot food takeaway (Class A5); installation of extraction/ventilation equipment and other external alterations) relating to the temporary extension of opening hours for the delivery of Pizzas until 01:00, 7 days a week, for one calendar year.
, TPP,05/05/2023

APP/25/00238 - Variation of Condition 4 of Planning Permission APP/18/01234 (and temporary permission APP/23/00146) relating to permitted opening hours to the following - The premises shall only be open to the public for trade or business between the hours of 09.00 and 23.00 Sunday to Thursday and between 09.00 and 00.00 on Fridays and Saturdays. No delivery of pizzas shall take place outside the hours of 09.00 to 01.00 the following morning on Sunday to Thursday and 09.00 to 02.00 Friday and Saturday., DEL,

3 Proposal

Prior Approval for development consisting of works for the construction of new dwellinghouses immediately above the topmost storey on a terrace building for Part single, part two-storey extensions to the existing terraced commercial buildings, comprising 24 residential apartments (Use Class C3), including the construction of external staircases and refuse / cycle storage.

4 Policy Considerations

National Planning Policy Framework
Havant Borough Council Borough Design Guide SPD December 2011
Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS21	(Developer Requirements)

CS4	(Town, District & Local Centres)
CS9	(Housing)
CS11	Protecting & Enhancing the Special Environment and Heritage of Havant Borough
DM10	(Pollution)
DM11	(Planning for More Sustainable Travel)
DM12	(Mitigating the Impact of Travel)
DM13	(Car and Cycle Parking on Residential Development)

Havant Borough Local Plan (Allocations) July 2014

DM17	(Contaminated Land)
AL1	(Presumption in Favour of Sustainable Development)
DM18	(Protecting New Development from Pollution)
DM20	Historic Assets
DM24	(Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development)
AL3	(Town, District and Local Centres)
AL2	(Urban Area Boundaries and Undeveloped Gaps between Settlements)

Emsworth Neighbourhood Plan

N/A

Listed Building Grade: Not applicable.

Conservation Area: 1

5 Statutory and Non Statutory Consultations

Building Control - No Comment

Community Infrastructure - Comment

Community Infrastructure Levy (CIL)

CIL Liable: <http://www.havant.gov.uk/community-infrastructure-levy-charging-schedule>.
If prior approval is granted we will require a CIL Form 5: Notice of Chargeable Development prior to commencement.

Mitigation

As this is a prior approval application, payment in respect of mitigation is required up front before commencement. However, we strongly recommend the applicant puts the required mitigation in place prior to the decision being made. If a prior approval is implemented without having met the obligations under the Habitat Regulations, there will be a breach of planning control.

Bird Aware Solent Revised Strategy:

If the applicant chooses to address the likely impact of bird disturbance utilising the Bird Aware Solent Revised Strategy, we can issue a unilateral undertaking on request. More information on our website here:

https://www.havant.gov.uk/planning-services/planning-policy/community_infrastructure-levy-cil/section-106-legal-agreements-3 Nutrient Neutrality: To mitigate against the increased nutrient load at the Solent European Sites, the developer will need to purchase third party mitigation and supply additional documentation. More information on our website

here: https://www.havant.gov.uk/planning-services/planning-policy/supplementary_planning-documents/nutrient-neutrality/nutrient-0 Please note that there is a monitoring charge of 1% of the third party mitigation cost.

Officer Comment: *Determination of the application is not dependent on the mitigation for nitrates and the Bird Aware Solent Revised Strategy being secured. This may be secured prior to development commencing, if approval is granted for the proposal.*

Conservation Officer – Objection

Heritage Consultation Response

Site / Location

The site is located on the corner of Park Road South and West Street in Havant Town Centre. It comprises a terrace of two-storey commercial units, which has frontages along the south side of West Street and the west side of Park Road South.

To the north and west of the site on West Street, is the Black Dog Conservation Area, which was designated in 1994. To the immediate west of the site, on Brockhampton Lane, is the former Black Dog PH which is a Grade II listed building, along with its flint boundary walls. This is identified in the Conservation Area Appraisal as being the most prominent building within the Black Dog Conservation Area.

At the end of the terrace fronting onto West Street, is No. 16 Park Road South which is included on the Council's List of Buildings of Local Interest. This building dates back to C18 and was originally a barn but has since been converted into a shop on the ground floor, with a residential flat above. Due to its architectural and historic interest, this is deemed to be a non-designated heritage asset (NDHA).

The St Faiths' Conservation Area lies to the east of the site however, this is not immediately adjacent, with some intervening modern development separating the conservation area from the application site.

Legislation

When assessing the proposal, the following legislation and policy context is taken in consideration.

Planning (Listed Building and Conservation Areas) Act 1990

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("1990 Act") requires local planning authorities to have **special regard to the desirability of preserving a listed building, its setting or any features of special architectural or historic interest** when considering whether to grant listed building consent.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which **affects a listed building or its setting**, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a **Conservation Area**, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

National Planning Policy Framework (revised December 2024)

Chapter 16 of the NPPF relates to **the Historic Environment** including paragraphs 202-221. The following paragraphs are most relevant to the determination of this application:

Para 212 states that:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Para 214 states that:

*'Where a development will result in **substantial harm to, or total loss of**, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 208 requires this harm to be weighed against the public benefits of the proposed development*

Para 215 states that:

*'Where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.*

Havant Borough Local Plan (Core Strategy 2011 and Allocations Plan 2014) **Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of the Havant Borough**

Policy CS11 (4) states that planning permission will be granted for development which:

'Protects and where appropriate enhances the borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest'.

Policy CS16 – High Quality Design

Policy CP16 (1a) of the Core Strategy states that:

'Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

- a. *Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site'.*
- b. *Integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design of a scheme wherever possible to create variety and interest;*
- c. *Uses the characteristics of the locality to help inform the design of the new*

- development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;*
- d. *Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible; and*
- e. *The development does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking.*

Policy DM20 (Allocations Plan) - Historic Assets

Policy DM20 states that;

'Planning permission will be granted for development proposals that conserves and enhances the historic assets of Havant. It also states that application which affect, or have the potential to affect, heritage assets are expected to provide a Heritage Statement that:

1. Describe the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal.

2. Sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets.

Assessment

The application is for a prior approval under Class AB of the GPDO for development consisting of new dwellinghouses above the existing terrace, comprising 24no. apartments, along with the construction of external staircases and refuse / cycle storage.

Lack of Heritage Statement

As stated above, the site is within a sensitive historic context with potential to affect the immediate settings of the Black Dog CA, the former Black Dog PH and boundary walls (Grade II listed) and No. 16 Park Road South, a NDHA included on the Council's Local List. From a review of the application documents, no assessment has been made with regards to the significance of these assets and the potential impact arising from the development. In fact, there is no reference to their existence within the application. This is contrary to advice set out within the NPPF and Local Plan Policy DM20 of the Local Plan (Allocations).

Impact of proposed design on the identified heritage assets

The proposal is split into two sections with the corner unit of Domino's remaining as two-storey. For the proposed extension to the West Street section, this would be a flat roof, two storey extension with no set back from the frontage. It would step down to a single storey roof extension above the unit immediately adjacent to Dominos.

NDHA:

With regards to the impact on No. 16 Park Road South (NHDA on the Local List), the proposal would result in a 4-storey flat roof structure, immediately adjacent to the NDHA. Whilst the existing building is already flat roof and not of a historic character, the existing height of the terrace does not dominate the NDHA. The introduction of a further two-storey's, would result in a highly overbearing impact which would visually detract from the character of the NDHA and result in harm to its immediate setting.

Black Dog CA:

With regards to West Street section, the unit immediately adjacent to Domino's would be single storey, whilst the remainder would be two-storey, extending right up to the end of the building. This terrace is immediately opposite the Black Dog CA and within its immediate setting. The north side of West Street is characterised by a group of domestic buildings dating from C17 to C19 which still exhibit the architectural styles and local materials of those periods including brick and rendered elevations with clay tiles roofs, with the scale of the original architecture remaining intact. Whilst the application site is a post-modern style terrace, not reflective of the historic character of West Street, its scale and massing does not dominate the streetscene and does not detract from the character of the conservation area which is directly opposite.

The proposed two-storey would alter the building into a 4-storey, flat roof structure, which would be highly dominant and overbearing, when viewed in context with the adjacent section of the Black Dog CA. By reason of its appearance and design, the proposal would result in less than substantial harm to the immediate setting of the CA.

Former Black Dog PH (Grade II):

This building sits to the immediate west of the site, being separated by the entrance to Brockhampton Road. Due to the proximity of the two sites, the proposed 4-storey, flat roof building, would be viewed in direct context with the listed building when stood on West Street looking south and when travelling along West Street from either side. As with the CA, at present the existing terrace, whilst not historic in character, does not visually compete with the listed building due to its limited scale. The introduction of a 4-storey, flat roof structure, would be highly dominant and overbearing to the setting of the listed building. By reason of its design (scale and bulk), the proposal would result in less than substantial harm to the setting of the Former Black Dog PH.

Summary

The application is contrary to the NPPF and Local Plan (DM20) due to the absence of a heritage statement, which identifies the affected heritage assets and their significance and assesses the impact of the proposed development.

It is considered that due to the design of the proposal, this would result in less than substantial harm to the settings of the Black Dog CA, the former Black Dog PH (Grade II listed building) and No. 16 Park Road South (NHDA on the Local List).

The application as submitted, fails to meet the tests set out in S16, S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("1990 Act"), as well as the relevant policies in the NPPF and Local Plan.

Conclusion

OBJECTION

Councillor Liz Fairhurst - Bedhampton - No Comment

Councillor Michael Lind - No Comment

Councillor Phillipa Gray - No Comment

Crime Prevention - Major Apps – No Comment

Environment Agency – Objection

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason

The proposed development is unacceptable because it proposes to develop an additional 2-storeys above the existing building, which is situated above the existing main river watercourse/culvert.

The proposed additional loading over the main river watercourse/culvert, proposes a significant flood risk concern and would be unlikely to receive Environment Agency consent for the works for the following reason:

- The foundations for the proposed building are likely to adversely affect the construction and stability of the culvert which will compromise its function. The proposal will therefore increase the risk of flooding to surrounding properties.

Advice to Local Planning Authority/Applicant

A culverted section of the Lavant runs under the site of the proposed building. The proposed development could potentially damage this culvert by adding additional load which would increase the risk of flooding to the development and neighbouring properties. This is contrary to the policy aims of the NPPF and policy CS15 of the Havant Borough Council Core Strategy.

It is important that not only is the development not built over the culvert, but also that development is not placed so close to the culvert that it damages the culvert or interferes with its maintenance. The term “maintenance” includes the possibility of replacing the culvert within the lifetime of the development (100 years for residential development). It should be noted that the riparian owner of the culvert, normally the owner of the land over the culvert, not the Environment Agency, is responsible for such maintenance.

Overcoming our objection

The applicant should investigate and evidence the additional load the proposed development places on the existing main river watercourse/culvert that is located through their site. They should indicate any impacts and mitigation measures proposed to ensure flood risk is not increased elsewhere. Further work should be undertaken to identify the precise line of the culvert to inform these plans, including:

- A plan and cross sections showing the accurate juxtaposition of development and the culvert, showing actual dimensions and levels, and taking into account the full size of the culvert structure and building foundations. All levels to be to Ordnance Survey datum.

- A structural survey of the pipeline within the site undertaken by an incorporated or chartered civil or structural engineer.

Advice to LPA/applicant

The FRA (ref: FLOOD RISK ASSESSMENT & SEQUENTIAL TEST) and supporting information submitted by the applicant is based on outdated modelling (Havant 2008 fluvial model). The NAFRA2 updated modelling demonstrates that the site is now at high risk of fluvial flooding (flood zones 2 and 3). It is recommended that the applicant reviews their evacuation plan according to the updated flood risk and have that approved in writing by the LPA.

The following issues are not within our direct remit or expertise but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Details and adequacy of an emergency plan
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood

The applicant has provided an evacuation plan (ref: APPENDIX D FLOOD WARNING & EVACUATION PLAN) that is based on an outdated model (Havant 2008 fluvial model), which has been replaced with the NAFRA2 model. The updated model indicates that the flood extent has increased, and the site is now at high risk of flooding from the river (flood zones 2 and 3). The evacuation route identified is now within flood zones 2 and 3 from fluvial flooding and is no longer a viable option for residents to safely evacuate the site.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be

limited to delivering flood warnings to occupants/users covered by our flood warning network.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners

and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

We strongly recommend the use of flood resistance and resilience measures. Physical barriers raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Structural Stability

Depths of and over 600mm poses a significant risk to structural stability.

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and
- potential impacts are not controlled by a planning permission

For further guidance please visit
<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Environmental Health Manager, Community Group – No comment at the time of writing the report

Hampshire Highways - Comments

Site Location

Figure 1.1 of the TS sets out the location of the proposed site which is located within Havant Town Centre. Havant Town Centre provides access to a wide range of facilities and services within an 800m walking distance including retail, leisure and employment facilities.

Sustainable Access

Walking and Cycling:

The TS provides a summary of the pedestrian and cycle infrastructure within the vicinity of the site.

Along Park Road South, dedicated off carriageway shared use facilities on the western side of the carriageway forming part of National Cycle Network (NCN Route 22). This provides connections towards Solent Retail Park and Hayling Island to the south and Havant Station and the Leisure Centre to the north.

A number of signalised pedestrian crossing points are provided along Park Road North and South running to the east of the site providing connections towards Havant Town Centre, Railway Station and Bus Station. West Street immediately to the east forms part of a pedestrianised high street providing direct access to various local amenities.

Brockhampton Lane has continuous footways on both sides of the carriageway providing access to the Solent Retail Park via Selbourne Road.

A development of 24 additional residential units is not insignificant and will undoubtedly have additional impacts on the highway network regardless of a car free development. The Highway Authority through study work have identified clear deficits in the pedestrian and cycle infrastructure along the Solent Road corridor up to Park Road South and down to Harts Farm Way with contributions sought from adjacent town centre applications. The scheme is not yet fully funded and additional monies should be sought from developments where additional walking and cycling trips are generated within the town centre.

Public Transport:

The nearest bus stops to the site are located along Park Road South, with Havant Bus Station located c. 200m to the north west. 10 bus routes are available from the bus station providing high frequency access to a number of destinations including Hayling Island, Waterlooville, Portsmouth and Chichester.

Havant railway station is c. 450m north from the site providing regular services to London, Portsmouth, Southampton and Brighton.

Access

Pedestrian access into the site is to be provided via existing site access points on Park Road South and Brockhampton lane. Stepped access is to be provided directly to the apartments themselves. Given the development is proposed as car free, no narrative is provided within the TS on vehicular access. This is noted.

Parking Provision

Vehicular:

The proposed development does not offer any on-site car parking provision and is intended to operate as a car-free scheme given the town centre location.

It is noted that Havant Borough Council's Parking SPD does outline that Havant Town Centre may be suitable for a lower level of car parking provision. It is noted that the site is located within close proximity to public transport services and local amenities and other public pay and display car parks which could accommodate any visitor parking demand. There is no opportunity for the local highway network to accommodate any overspill parking given the presence of parking restrictions.

Given the scale of the development and presence of parking restrictions within the vicinity of the site, Havant Borough Council in their capacity as the Local Parking Authority should confirm whether a car free development is acceptable.

Cycle:

Cycle parking is to be provided in excess of the HBC Parking standard which suggests one space per apartment. A total of 30 covered and secure spaces are to be provided in a dedicated ground floor cycle store. An additional 6 short stay Sheffield Stands are provided. Ideally these should be covered and secure to encourage use of sustainable modes for visitors however this would be for Havant Borough Council to raise in their capacity as the Local Parking Authority.

Refuse and Servicing Arrangements

Refuse and servicing arrangements are intended to remain as existing with vehicles to access the site from Brockhampton Lane with additional refuse storage provided on ground floor level. The Highway Authority are not aware of any issues regarding the current servicing arrangements and are therefore content for these to operate in the same manner. The Planning Authority should be satisfied that a fire tender is able to access the buildings in a safe and suitable manner.

Traffic Impact

Given the car free nature of the development, any traffic impact will be negligible and therefore not considered to have any material impact on the local highway network operation. Should the Planning Authority not be agreeable to a car free development then the impact of any additional trips on the local highway network should be fully assessed.

Officer Comment: *The Local Planning Authority is content for the proposal to be a car free development for the reasons given below under the heading 'Parking'. There is considered to be sufficient space to the rear of the site for a fire tender to access the building in a safe and suitable manner.*

Norse South East, Operations Director - No Comment

Policy - Objection

As a prior approval, the following comments do not cover the usual policy considerations such as brownfield redevelopment, town centre location and housing supply, covering only key policy matters for consideration under the prior approval.

Flood Risk

The site is at considered of fluvial flood risk, now and in the future, lying in Flood Zones 2 and 3, according to the National Flood Map for Planning and the Council's Strategic Flood Risk Assessment. The applicant has provided a Flood Risk Assessment. However, it is noted that this uses outdated information, including Flood Zone information from 2024. New national flood risk data was published by the EA in March 2025, and together with the Council's SFRA should form the starting point for flood risk assessments. While it is acknowledged that the flats are proposed at upper floors, the entrance and exist to the proposed flats now lies in Flood Zones 2 and 3. The applicant's Flood Warning and Evacuation Plan assumes a lesser extent of the flood zones and has therefore not fully considered the risk to any future occupants, or suitable evacuation arrangements in the event of a flood. Overall, it is considered that flood risk to the site has not been adequately assessed, so it cannot be assumed that the proposed development is safe.

A policy objection therefore arises on the basis that the proposal does not meet national or local policy expectations with regard to flood risk.

Parking

No parking provision for residents is made within the proposal. This is discussed further in the applicant's Transport Statement. In acknowledgement of the higher accessibility of Havant Town centre compared to other part of the Borough, the Council has set maximum, rather than minimum parking standards for Havant Town Centre, and considers that zero parking development schemes could be considered suitable in this location (see p.22 of the Council's Parking SPD). It is also noted that cycle parking is

provided, supporting sustainable transport aims.

Overall, a car free development is considered to be acceptable in this location in policy terms. However, the SPD also states at paragraph 3.06 that 'On any site where a reduced level of parking provision is considered justified by the Local Planning Authority, the design and layout of the development must include a sufficient space for servicing, emergency services and medical personnel to park, loading and drop off, courier and supermarket deliveries. This should be provided as a single space, the size of which is related to the scale of the proposed development' Such provision does not appear to have been made in this proposal, and given the proliferation of deliveries, and the limited on street parking available this would need to be addressed to make the scheme acceptable.

Waste Services Manager - No Comment

6 Community Involvement

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 92

Number of site notices: 2

Statutory advertisement: Not applicable.

Number of representations received: 6

The following is a precise of the representations received. Their full comments may be viewed on the Council's website.

Highways & Parking

Transport Statement fundamentally flawed - naive to believe that new residents will embrace public transport and eschew car ownership

Misleading to suggest all residents will be cyclists – cars primary mode of transportation

No parking for residents – very limited space in the area – only short-term parking in town centre

Recognise need for housing, but where will residents park?

Why did the car park opposite be closed/demolished?

What is to prevent residents with cars adding to the pressure in West Street?

Will residents be excluded from residents parking in West Street when introduced?

Residents parking should be introduced on all roads up to Warblington

Reject proposal unless sufficient parking provided.

Traffic already a major issue - is there evidence that the proposal would not lead to an

increase in car usage in the area? National Travel Survey shows an increase in car ownership, with some households having two or more cars.

24 properties, potential for 24 cars or more, plus visitors & potential for increase for deliveries

No problems if occupation limited to cyclists/public transport users only.

Traffic is an issue in the town - infrastructure should be improved first

Junction of West Street & Park Road South barely functions now - construction traffic will gridlock Havant – construction impact likely to be a statutory nuisance, whether generated by dust, noise, waste generation or working outside of prescriptive hours.

Amenity

Catastrophic effects on health and well-being

Potential adverse Impact on local business during construction by erection of scaffolding– impact on population unacceptable.

Other Matters

No guarantee that the dedicate waste storage will be used as stated– what restrictions to prevent use on collection day only?

Officer Comment: *most of the points are covered under Section 7 below, which the exception of the following:*

Any controls over how waste is stored on site would be a management issue for the development if approval is granted

7. Preliminary Matters

- 7.1 Article 3 (1) Permitted development of The Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended) states:

“ Subject to the provisions of this Order and regulations 75 to 78 of the Conservation of Habitats and Species Regulations 2017 (general development orders), planning permission is hereby granted for the classes of development described as permitted development in Schedule 2”

- 7.2 In turn Regulation 75 of the Conservation of Habitats and Species Regulations 2017 (as amended) (CHSR) sets out that to be permitted development, any development that is likely to have a significant effect on a European site must not be begun until written notification of an appropriate assessment has been undertaken in accordance with Regulation 77.
- 7.3 Therefore, the determination of this application is not dependent on a Habitats Regulations Assessment (HRA), including an Appropriate Assessment (AA) under Regulation 63 of CHSR, being undertaken at this stage. No such assessment has been carried out by the Local Planning Authority in respect of the proposal. However, if approval is granted for the proposal, it is open to the applicant, prior to development commencing, to apply to the LPA under Regulation 77 of the CHSR for an HRA/AA to be undertaken and for Natural England, be consulted.

7.4 In addition, Article 3 (9A) does not grant permission for, or authorise any development of, any new dwellinghouse:

- (a) where the gross internal floor area is less than 37 square metres in size; or
- (b) that does not comply with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015.

7.5 In this instance all 24 flats meet the minimum size requirement set out in the nationally described standard and would comply with Article 3 (9A).

8 Planning Considerations

8.1 **Schedule 2, Part 20, Class AB of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (the GPDO), permits development of new dwellinghouses on terrace buildings in commercial or mixed use.**

8.2 Class AB (1) allows development consisting of works for the construction of new dwellinghouses, up to two additional storeys, immediately above the topmost storey on a terrace building subject to a number of criteria.

8.3 Class AB(3) provides for any engineering operations, replacement of existing plant or installation of additional plant on the roof of the extended building, construction of a safe access/egress from the new dwellinghouses and for the construction of storage, waste and other ancillary features reasonably necessary to support the new dwellinghouses.

8.4 **AB.1. Development is not permitted by Class AB if –**

(a) the building was constructed before 1st July 1948 or after 5th March 2018;

The building was constructed between the above two dates.

(b) on 5th March 2018 the building was in a use other than –

(i) a use or mixed use within paragraph AB(2)(a) or (b); or

(ii) a use falling within Class C3 of the Schedule to the Use Classes Order;

All of the existing commercial premises which comprise the ‘Property’ to be extended fell under Classes A1, A2, A3 or B1(a) of the 1987 Order on 5th March 2018 and so comply with paragraph (2)(b)(i). Now Class E uses.

The lawful use therefore qualifies.

(c) the additional storeys are constructed other than on the principal part of the building;

The upward extension would be directly above the ground floor of the principal

building. The proposal complies.

(d) the floor to ceiling height of any additional storey, measured internally, would exceed the lower of –

- (i) 3 metres; or
- (ii) the floor to ceiling height, measured internally, of any storey of the principal part of the existing building;

The floor to ceiling height of both additional storeys measures 2.4m in height, which is less than the floor to ceiling height in the existing building which measures 2.4 metres to 2.8 metres. The proposal complies.

(e) the new dwellinghouses are not flats;

The proposal would provide flats. The proposal complies.

(f) the height of the highest part of the roof of the extended building (not including plant) would be greater than 18 metres.

The building would be no higher than 12 metres and complies.

(g) the height of the highest part of the roof of the extended building would exceed by more than 3.5 metres the height of the highest part of the roof of every other building in the row of terrace buildings of which it forms part (not including plant, in each case);

The proposal is a two storey extension which can exceed the height of the existing buildings by up to 7m, with the height of the highest part of the extended building not exceeding the height of the highest building in the terrace by more than 3.5m

The proposal complies.

(h) the height of the highest part of the roof of the extended building would exceed the height of the highest part of the roof of the existing building (not including plant, in each case) by more than –

- (i) 3.5 metres, where the existing building consists of one storey; or
- (ii) 7 metres, where the existing building consists of more than one storey;

The existing building is two storey with offices at first floor, and the height of the highest part of the extended building would not exceed 7 metres above the highest part of the existing building. The proposal complies.

(i) the existing building has been enlarged by the addition of one or more storeys above the original building, whether in reliance on permission granted under this Part or otherwise;

AB(3)(a) Relates to the existing building not being previously enlarged by an additional one or more storeys. The proposal complies.

(j) development under Class AB(3)(a) would include the provision of visible support structures on or attached to the exterior of the building upon completion of the development;

AB(3)(a) Relates to engineering operations reasonably necessary to construct the additional storeys. The proposed works would not require the provision of visible support structures on or attached to the exterior of the building upon completion of the development. The proposal complies.

(k) development under Class AB (3) (a) would consist of engineering operations other than works within the existing curtilage of the building to –

- (i) strengthen existing walls;
- (ii) strengthen existing foundations; or
- (iii) install or replace water, drainage, electricity, gas or other services;

AB(3)(a) Relates to engineering operations reasonably necessary to construct the additional storeys. Any works to strengthen existing walls or the foundations of the building, and to install or replace services, will take place within the curtilage of the building. The proposal complies.

(l) in the case of Class AB(3)(b) development there is no existing plant on the building.

AB (3) (b) relates to replacement to existing plant on the building. There is existing plant visible on the exterior of the building. The proposal complies.

(m) in the case of Class AB(3)(b) development the height of any replaced or additional plant as measured from the lowest surface of the new roof on the principal part of the extended building would exceed the height of any existing plant as measured from the lowest surface of the existing roof on the principal part of the existing building;

AB (3) (b) relates to replacement or new plant on the roof of the extended building. No plant will exceed the height of any existing plant. The proposal complies.

(n) development under Class AB(3) (c) would extend beyond the curtilage of the existing building;

AB (3) (c) relates to provision of safe access to, and egress from, the new dwellinghouses via additional staircases. which would be located within the curtilage

of the existing building. The proposal complies.

(o) development under Class AB (3) (d) would –

- (i) extend beyond the curtilage of the existing building;
- (ii) be situated on land forward of a wall forming the principal elevation of the existing building; or
- (iii) be situated on land forward fronting a highway and forming a side elevation of the existing building

AB (3) (d) relates to works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses. The proposed refuse and recyclable Waste Management collection point and cycle storage facility would be sited within the rear courtyard and within the site boundary. The proposal complies.

- (p) the land or site on which the building is located, is or forms part of –
 - (i) article 2(3) land;
 - (ii) a site of special scientific interest;
 - (iii) a listed building or land within its curtilage;
 - (iv) a scheduled monument or land within its curtilage
 - (v) a safety hazard area;
 - (vi) a military explosives storage area; or
 - (vii) land within 3km of the perimeters of an aerodrome.

The site is not within any of the areas mentioned in paragraph (p). The proposal complies.

Conditions

8.5 **AB.2 (1) Where any development under Class AB is proposed, development is permitted subject to a condition that before the beginning of the development, the developer must apply to the local planning authority for prior approval as to –**

- (a) transport and highways impacts of the development;

8.6 A Transport Statement accompanied the application. As noted above, the Highway Authority has reviewed the information submitted and raises no highway objection.

8.7 As noted above, several representations have been received regarding the existing lack of on street parking, the high demand for such parking, that no parking is proposed, and that the proposal would exacerbate existing car parking problems in the area.

The accompanied Planning Statement states:

"The proposed development will not result in the loss of any parking spaces for the existing commercial uses located at the Site, this is because of the residential apartments themselves do not require parking spaces due to their location within the Town Centre."

The application has therefore been submitted on the basis of no on site parking and the supporting statement notes the site is in a highly accessible location close to shops, employment and amenities, as well as being close to multiple bus routes and where both cycling and walking are viable transport options. This is discussed further in the applicant's Transport Statement. In acknowledgement of the higher accessibility of Havant Town centre compared to other parts of the Borough, the Council has set maximum, rather than minimum parking standards for Havant Town Centre, and considers that zero parking development schemes could be considered suitable in this location (as per page.22 of the Council's Parking SPD). It is also noted that a Cycle Store providing 30 spaces in two tier racks, with an additional 6 short stay Sheffield provision, would be provided supporting sustainable transport aims. A refuse recyclable waste management collection point would also be to the rear.

Havant's Car Parking SPD identified Havant Town Centre as *"...the most accessible part of the Borough with the widest choice of shops, services and public transport options."* The SPD recognises that *"... reliance on private vehicle use and ownership should be less."* and that *"Given its comparatively higher level of accessibility, zero parking development schemes could be considered suitable in Havant Town Centre..."*. The proximity of the site to public transport and a wide range of facilities by foot or cycle is an important material consideration.

Overall, a car free development is considered to be acceptable in this location in policy terms. However, the SPD also states at paragraph 3.06 that *'On any site where a reduced level of parking provision is considered justified by the Local Planning Authority, the design and layout of the development must include a sufficient space for servicing, emergency services and medical personnel to park, loading and drop off, courier and supermarket deliveries. This should be provided as a single space, the size of which is related to the scale of the proposed development'* Such provision is not provided for in the proposal, and given the proliferation of deliveries, and the limited-on street parking available this would normally need to be addressed to make the scheme acceptable. If approval was granted such provision to the rear would be conditioned.

(b) air traffic and defence asset impacts of the development;

8.8 The development would not interfere with any air traffic or defence asset.

(c) contamination risks in relation to the building;

8.9 A Phase 1 Land Contamination Assessment accompanied the application. The proposal only relates to building upwards above the existing building, with no ground works involved, nor any ground floor amenity landscaped space, limiting ground disturbance or contamination risks.

(d) flooding risks in relation to the building;

8.10 The site is considered to be at fluvial flood risk, now and in the future, lying in Flood Zones 2 and 3, according to the National Flood Map for Planning and the Council's Strategic Flood Risk Assessment.

The applicant has provided a Flood Risk Assessment. However, it is noted that this uses outdated information, including Flood Zone information from 2024. New national flood risk data was published by the Environment Agency in March 2025, and together with the Council's Strategic Flood Risk Assessment should form the starting point for flood risk assessments.

The Environment Agency on being consulted raised concerns regarding the adequacies of the Flood Risk Assessment and supporting information stating it is "... *based on outdated modelling (Havant 2008 fluvial model)*" not the National Flood Risk Assessment 2 updated modelling which demonstrates that the site is now at high risk of fluvial flooding (flood zones 2 and 3).

The entrance and exit to the proposed flats now lie in Flood Zones 2 and 3. The applicant's Flood Warning and Evacuation Plan assumes a lesser extent of the flood zones and has therefore not fully considered the current risk.

Overall, it is considered that flood risk to the site has not been adequately assessed, so it cannot be assumed that the proposed development is safe and therefore does not meet national or local policy expectations with regard to flood risk. The proposal is therefore contrary to Policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

Notwithstanding, the fundamental concerns regarding the flood risk associated with fluvial flooding, the EA has raised an objection to the proposal on the following grounds:

"The proposed development is unacceptable because it proposes to develop an additional 2-storeys above the existing building, which is situated above the existing main river watercourse/culvert.

The proposed additional loading over the main river watercourse/culvert, proposes a significant flood risk concern and would be unlikely to receive Environment Agency consent for the works for the following reason:

- The foundations for the proposed building are likely to adversely affect the construction and stability of the culvert which will compromise its function. The proposal will therefore increase the risk of flooding to surrounding properties."*

To overcome the EA's objection the following information was required:

"The applicant should investigate and evidence the additional load the proposed development places on the existing main river watercourse/culvert that is located through their site. They should indicate any impacts and mitigation measures proposed to ensure flood risk is not increased elsewhere. Further work should be undertaken to identify the precise line of the culvert to inform these plans, including:

- A plan and cross sections showing the accurate juxtaposition of development and the culvert, showing actual dimensions and levels, and taking into account the full size of the culvert structure and building foundations. All levels to be to Ordnance Survey datum.*
- A structural survey of the pipeline within the site undertaken by an incorporated or chartered civil or structural engineer".*

The agent's response did not cover this information, providing instead a survey in respect of the foundations, with a recommendation "... *that the building are fully surveyed for any potential structural defects before construction begins.*" No reference is made to the culver under the building in this survey

As the applicant has not addressed the EA's objection, nor has the FRA adequately assessed the flood risk for the development the proposal fails to satisfy these criteria.

(e) the external appearance of the building, including—

(i) the design and architectural features of –

(aa) the principal elevation; and

(bb) any side elevation that fronts a highway; and

(ii) the impact of any works under sub-paragraph AB(3)(c) or (d);

The existing building is two-storey, located on a prominent corner position in the centre of Havant, opposite the Black Dog Conservation Area in West Street and Brockhampton Lane. The proposal is also opposite the former Black Dog PH (Grade II) in Brockhampton Lane.,

As to the existing buildings at ground floor is a range of Class E uses, with direct access onto the pavement, with offices at first floor. There is also access to these commercial uses from the rear of the buildings. Domino's Pizza which sits at the junction of Park Road South and West Street is not part of the proposal, but lies within the centre of it, as it does not fall within a Class E use, as it is a takeaway which is a Sui Generis use, which means it does not belong to any specific Use Class.

The main frontages of the proposal onto Park Road South, West Street and Brockhampton Lane would be treated with red facing brickwork at the first level. As to the second level this would be treated with a grey zinc cladding. As to the colour of the UPVC windows this is not clear as the Planning Statement refers to white UPVC, with plans stating Grey UPVC windows, with the latter more in keeping with the proposed grey zinc cladding. With reference to the existing building, windows would be placed centrally to the existing windows/architectural features on the ground and first floor, to following the relative symmetry of the existing building.

The scale of the existing building is very much in keeping with the immediate street scene, which is two storey, albeit it is acknowledged that there are higher buildings within South Park Road.

As stated above, the proposal is located on a prominent corner location in the centre of Havant, where its impact on the street scene would be significant. Due to proposal excessive height, mass and bulk, it would have an adverse impact on this prominent town centre location.

The two-storey upward extension does not include Domino's, due to this property falling within a different use class, which is sited effectively in the centre of the development, in a highly visual town centre location at the junction of Park Road South and West Street. Instead, the proposal drops down to a single upward extension on either side of Domino's, resulting in an unbalanced and jarring element, which would be at odds with the existing pattern of development at this prominent corner location, which is two-storey. This incongruous design would dominate t this prominent location, which would not be in harmony or keeping with its surroundings. The upward two storey extension would also dominate lan's to the south, which is a chalet type building, failing to follow the established

pattern of properties on the street. The design and visual prominence of the proposal would adversely impact the established rhythm and scale of the street scene at this highly visible town centre crossroads location contrary to Havant's Design Guide SPD, Policy C16 of Havant Borough Council Local Plan (Core Strategy) and the National Planning Policy Framework which positively promotes quality development.

The Council's Conservation Officer (CO) has been consulted over the proposal raising an objection to the proposal. Full detail of the CO's comments is set out above. In summarising the objection, the proposal would have a highly overbearing impact on 16 Park Road South which is a Non-Designated Heritage Asset; would be highly dominant and overbearing when viewed in context with the adjacent section of the Black Dog CA; and would be highly dominant and overbearing to the setting of the Former Black Dog PH.

(f) the provision of adequate natural light in all habitable rooms of the new dwellinghouses;

7.16 As to the proposal all of the bedrooms and living areas of the proposed flats would be served by windows. The application is accompanied by a Daylight, Sunlight and Overshadowing Assessment, which found:

"Proposed Buildings

The vast majority of the habitable rooms within the proposed development (94%) will meet the guidance levels for SDA daylight illuminance and all dwellings will meet the minimum criteria for sunlight exposure."

The proposal is considered to provide adequate natural light in all habitable rooms of the new dwellinghouse.

(g) impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light;

7.17 The application is accompanied by a Noise Impact Assessment on which Environmental Health has been consulted, with no comments received.

The application is accompanied by a Daylight, Sunlight and Overshadowing Assessment, which analyses the daylight and sunlight impact of the proposal on residential properties in Park Road South/West Street/Brockhampton Lane. This concludes:

"Existing Buildings

The majority of windows and rooms in the neighbouring properties will meet the BRE recommendations for VSC, DD and APSH.

Proposed Buildings

The vast majority of the habitable rooms within the proposed development (94%) will meet the guidance levels for SDA daylight illuminance and all dwellings will meet the minimum criteria for sunlight exposure."

As regard the amenity of neighbouring residential properties, there is existing residential developments to the north and west of the site. The site is located above commercial premises, within a town centre location, where existing residents would be subject to a level of noise and disturbance from activities associated with these uses and the location.

As to privacy, loss of light/sunlight and impact the proposal would increase the height of the existing building from approximately 6.5m to 11.5m high with a separation distance of approximately 17m from residential properties on the north side of West Street. There is a road and pavements in between. Havant Design Guide SPD states “...that the extensive obstruction of sunlight to an existing property or its garden by the construction of a new building or extension is likely to be unacceptable.” “This is particularly important where neighbouring properties are taking advantage of the sun’s orientation for solar gain.” The properties fronting West Street face south, take advantage of solar gain from the sun. Based on the above report, it is considered that the proposal would not adversely impact on the light/sunlight currently enjoyed by the properties on the north side of West Street and the properties in Brockhampton Lae. However, due to the excessive scale, massing and bulk the proposal which would increase in height of the existing building from two to four storey it is considered that the proposal would be dominant and overbearing to the residential properties in West Street and Brockhampton Lane.

As to the impact on the amenity of the existing commercial buildings, it is not considered that the proposal would give rise to any adverse effects including overlooking, privacy and loss of light. This is considered to also be the case as to neighbouring commercial premises.

(h) impact of noise from any commercial premises on the intended occupiers of the new dwellinghouses;

7.18 The existing uses of the buildings are Class E, which by their definition, must not create noise, dust, fumes, smells, or other emissions that interfere with the reasonable enjoyment of neighbouring properties, pose a risk to health, or are a persistent occurrence. Therefore, it is considered that the impact from the commercial premises would not reasonably interfere with the amenity of the proposed residential properties.

Environmental Health has been consulted over proposal, but no response has been received. If the proposal was granted appropriate conditions would be imposed.

(i) impacts of the introduction of, or an increase in, a residential use of premises in the area on the carrying on of any trade, business or other use of land in the area;

7.19 It is not uncommon to have mixed uses comprising of retail/commercial at ground floor and residential above. Arguably the increase in residents would increase footfall and customer base for the local businesses. Overall, it is not considered that the proposal would have any harmful impact on trade or business in the area.

(j) whether, because of the siting of the building, the development will impact on a protected view identified in the Directions Relating to Protected Vistas dated 15th March 2012/190 issued by the Secretary of State.

7.20 The development will not impact on a protected view.

8 Conclusion

8.1 The construction of new dwellinghouses on terrace buildings in commercial or mixed use is permitted development, under Schedule 2, Part 20, Class AB of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, subject to prior approval. In light of the foregoing analysis, it can be concluded that the development does not comply with the relevant permitted development criteria and moreover the matters which are the subject of prior approval, have not been satisfied as to flood risk, design criteria and adverse impact on neighbouring properties and, adversely impact on the conservation area. Prior Approval is therefore required and refused.

9 RECOMMENDATION:

That the Development Manager be authorised to refuse application APP/25/00544

for the following reasons:

The foundations for the proposed building are likely to adversely affect the construction and stability of an existing main river watercourse/culvert which is located under the existing building which would compromise its function. The proposal would therefore increase the risk of flooding to surrounding properties. The proposal is therefore contrary to policies CS15 and CS16 of the Havant Borough Local Plan (Core Strategy)

The site is situated within an area defined by the Environment Agency and the Council's Strategic Flood Risk Assessment as being at serious risk of flooding (ie Flood Zones 2 and 3) and the proposal to add additional dwellings would therefore be inappropriate due to the potential risk of loss of life. It is therefore contrary to policies CS15 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

The proposal would be located on a prominent corner location in the centre of Havant, where its impact on the street scene would be significant. The two-storey upward extension does not include Domino's Pizza due to this property falling within a different use class, which is sited centrally in the development, in a highly visual town centre location at the junction of Park Road South and West Street. Instead, the proposal drops down to a single upward extension on either side of Domino's Pizza, resulting in an unbalanced and jarring element, which would be at odds with the existing pattern of development at this prominent corner location, which is two-storey. This incongruous design would dominate this prominent town centre location, which would not be in harmony or in keeping with its surroundings. The upward two storey extension would also dominate Ian's to the south, which is a chalet type building, failing to follow the established pattern of properties on the street. The design, excessive height, mass, bulk and the visual prominence of the proposal would adversely impact the established rhythm and scale of the street scene at this highly visible town centre crossroads location contrary to Havant's Design Guide SPD, Policy C16 of Havant Borough Council Local Plan (Core Strategy) 2011 and the National Planning Policy Framework which positively promotes quality development.

Due to the scale of the proposal which would increase the height of the existing

building from two to four storey it would dominant and be overbearing to the residential properties in West Street and Brockhampton Lane contrary to Policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011

The proposal would have a significantly harmful impact on the Black Dog Conservation Area contrary to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011 and Policy DM24 of the Havant Borough Local Plan (Allocations) 2014 and the National Planning Policy Framework.