



Planning Statement

**Prior Approval Application at 56a East Street, Havant
PO9 1BS**

Livelihood Technology Ltd

McCormack House, 56a East Street, Havant PO9 1BS

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1.0 Introduction

- 1.1 This Planning Statement is prepared by SLR Consulting Ltd on behalf of our client, Livelink Technology Ltd (“the applicant”) in relation to the submission of a prior approval application to Havant Borough Council (“the Council”) for the change of use from offices (Use Class E) to 19 residential units (Use Class C3) at McCormack House (also referred to as ‘Town End House’), 56a East Street, Havant PO9 1BS (“the Site”).
- 1.2 The current lawful use of the Site is for Use Class E offices, hosted within a two-storey building that is located within the settlement boundary of Havant. It is in a highly sustainable location on the eastern edge of Havant Town Centre where development that promotes the viability and vitality of the town centre should be championed. The Site also benefits from an allocation including residential development (19 units) in the Havant Borough Local Plan (Allocations, adopted July 2014). The Site has good access to services (such as the 700 Coastliner and no.27 bus services and Havant and Warblington Train Stations) and facilities (such as schools, open space, doctors’ surgeries and pharmacies, and public car parks). It is within the St Faith’s Conservation Area.
- 1.3 The proposed development seeks the change of use of the building to 19 Use Class C3 residential apartments, with a variety of two-, three- and four-bedroom units all of which meet or exceed national space standards. No external changes are proposed. The proposed development will offer 30 car parking spaces within the existing car park to the south of the Site. Each residential unit will be allocated at least one car parking space, and future residents will use the existing cycle parking stands.
- 1.4 The proposed development is acceptable with regards to transport impacts, contamination, flood risk, noise, impact on the St Faith’s Conservation Area, natural light in habitable rooms, industry, and fire risk. The proposed development also demonstrates that it can achieve nutrient neutrality.
- 1.5 As such, the proposed permitted development satisfies the requirements of Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), as well as Articles 3 (1) and (9A). We respectfully request that the Council grants the prior approval sought at the earliest opportunity.

Supporting documents

- 1.6 Alongside this Planning Statement, the application is supported by:
 - Application forms;
 - Completed CIL form;
 - Location Plan, including Block Plan (ref 24038-PL-001);
 - Existing Ground Floor Plans (ref 24038-PL-002);
 - Proposed Ground Floor Plan (ref 24038-PL-003);
 - Existing First Floor Plans (ref 24038-PL-004);
 - Proposed First Floor Plan (ref 24038-PL-005);
 - Existing Elevations, including Roof Plan (ref 24038-PL-006);
 - Proposed Elevations, including Roof Plan (ref 24038-PL-007);
 - Daylight and Sunlight Appraisal (by CHP Surveyors);
 - Highways Statement (by SLR);
 - Heritage Statement (by SLR);



- Flood Risk Technical Note (by Motion);
- EU Mitigation Checklist; and
- Nutrient Neutrality Assessment, including Nutrient Neutrality Calculator and Nutrient Budget (by SLR).



2.0 The Site

- 2.1 The Site comprises a two-storey building with associated car parking and hardstanding, located adjacent to The Spring Arts and Heritage Centre.
- 2.2 The current and lawful use of the Site is office – Use Class E (Commercial, Business and Service) of the Town and Country Planning (Use Classes) Order 1987 (as amended).
- 2.3 The Site has a shared access and car parking to the east, including the public car park (Town End House Car Park).
- 2.4 Surrounding the Site are residential properties to the north-east, east, south and south-west of the Site. To the immediate north is a Post Office, with additional residential development further north. To the immediate west is The Spring Arts and Heritage Centre, and further east is additional residential development.
- 2.5 The Site is:
 - within the Havant Town Centre boundary;
 - allocated for development (including residential) under Policy HB3 (ref H72) of the Havant Borough Local Plan (Allocations, adopted July 2014);
 - in the St Faiths Conservation Area;
 - not statutorily or locally listed;
 - in flood zone 1 (lowest probability of fluvial flood risk);
 - largely at low risk of surface water flooding, with a small area (outside of the building footprint) at 1:30 risk; and
 - in the Solent Special Protection Area 5.6km buffer zone.

Site Planning History

- 2.6 The Site's relevant planning history comprises:
 - APP/23/00996 - Change of use from office use (Class E) to education use (Class F1) and associated external alterations to the building and its curtilage, including provision of a multi-use games area (MUGA) and new fencing – withdrawn 19 February 2025;
 - APP/18/01161 - Retrospective planning application for erection of a free-standing, open front, smoking shelter – approved 4 February 2019; and
 - APP/16/01270 - Erection of free-standing open fronted smoking shelter – approved 21 April 2017.



3.0 The Proposed Development

3.1 The prior approval application seeks the following (“the proposed development”):

Prior approval application for the change of use from office (Use Class E) to 19 residential units (Use Class C3).

3.2 The table below shows the accommodation schedule:

Unit number	Occupancy	Unit size (sq m)	National Space Standards (sq m)
1	3-bed, 5-person	90	86
2	2-bed, 4-person	72	70
3 (duplex)	2-bed, 4-person	84	79
4	2-bed, 4-person	71	70
5	2-bed, 4-person	81	70
6 (duplex)	2-bed, 4-person	93	79
7	2-bed, 4-person	78	70
8	4-bed, 6-person	101	79
9	2-bed, 3-person	65	61
10	2-bed, 3-person	69	61
11	3-bed, 5-person	91	86
12	2-bed, 4-person	75	70
13	2-bed, 4-person	73	70
14	2-bed, 4-person	72	70
15	2-bed, 4-person	80	70
16	4-bed, 6-person	99	99
17	2-bed, 3-person	63	61
18	3-bed, 4-person	79	74
19	3-bed, 4-person	74	74

3.3 Each unit will be allocated at least one car parking space within the existing car park to the south of the Site. Future residents will use the existing cycle parking stands.

3.4 No external changes are proposed to the building, nor the car park or access.



4.0 Planning Assessment

- 4.1 The prior approval application seeks the following (“the proposed development”):
- 4.2 Permission is sought via permitted development rights as set out in Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Part MA.1 compliance

- 4.3 Part MA.1 of the legislation sets out that the permitted development rights only apply in specific circumstances. The Site satisfies the criteria of Class MA.1 as:
- the offices (Use Class E) have been in use for a period of at least two years prior to the application. This is confirmed via the Havant business rate records, which list the property as ‘Offices and Premises’, with the rates being in effect since 2014;
 - the Site is not, nor forms part of a site of special scientific interest; a listed building; the curtilage of a listed building; a scheduled monument; the curtilage of a scheduled monument; a safety hazard area; nor a military explosives storage area;
 - the Site is not within a national landscape; an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981(a); the Broads; a National Park; nor a World Heritage Site;
 - the Site is not occupied under an agricultural tenancy; and
 - there is no Article 4 Direction, nor any planning conditions, removing Class MA permitted development rights from the Site.

Part MA.2 compliance

- 4.4 Part MA.2 of the legislation sets out that before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the listed matters.
- 4.5 The proposal will satisfy all the criteria in full, as set out below.

a) Transport impacts of the development, particularly to ensure safe site access

- 4.6 The Site is located in a highly sustainable location within Havant, approximately 450m to the east of the Town Centre.
- 4.7 The closest bus stops to the Site are on East Street, within 50m of the Site access (Spring Arts Centre stops). These bus stops serve routes 27 and 700. In addition to this, Havant bus station is located 500m from the Site. The accessible routes provide good access to locations such as: Emsworth, Portsmouth, Southsea, Petersfield and Chichester, amongst other locations.
- 4.8 Havant Station is located 600m to the north of the Site, providing access to destinations such as (but not limited to): Portsmouth, Southampton, Fareham, Chichester, Brighton, and Gatwick Airport, and London Victoria.
- 4.9 The Site has high walking and cycling accessibility. It benefits from pedestrian access to East Street. There is also a Public Right of Way (ref 108/57/1) along the southern boundary of the Site, along with a further Public Right of Way (ref 108/58/1) that starts to the south of the car parking area outside of the Site’s boundary. There is a disused railway line which runs to the east of the Site along the car parking area which is identified as a National Cycle Network.



4.10 Table 2-1 of the Transport Technical Note shows the walking and cycling distances to key amenities and services surrounding the Site.

4.11 In terms of accessibility, paragraphs 5.6 and 5.9 of the Transport Technical Note conclude that:

“The Site is located in a highly accessible location, within Havant Town Centre. Residents of the proposed development will benefit from the existing infrastructure within the vicinity of the Site, aligning with the schemes vision to put people first and ensures access to a choice of sustainable transport modes”

“A trip generation assessment shows that the proposals will result in a net decrease in vehicle movements. Therefore, it is considered that that the proposed development will not result in a detrimental impact along the highway network [...]. The proposals are therefore acceptable in highways and transportation terms.”

4.12 There is a public car park known as ‘Town End House Car Park’ and then the private car parking for McCormack House is further to the south. Within the private car park to the south, each apartment will be allocated at least one car parking space.

4.13 The existing Sheffield-style stand located at the entrance will be retained. Should a need for additional cycle parking arise, this can be secured by condition.

4.14 As concluded at paragraph 5.10 of the supporting Highways Technical Note:

“[...] the Proposed Development has considered the transport impacts, particularly to ensure safe site access. As such, the relevant condition of Class MA of the Town and Country Planning (General Permitted Development) (England) (Order) 2015 is satisfied.”

b) Contamination risks in relation to the building

4.15 There is no evidence of contamination on the National Coal Authority’s Interactive Map, the Environment Agency’s online mapping records, and the Council’s online planning application history in relation to the Site.

4.16 The proposed development would also not involve any ground works.

4.17 As such, there are no contamination risks in relation to the building.

c) Flooding risks in relation to the building

4.18 The Site is located wholly within Environment Agency Flood Zone 1 with the lowest risk of fluvial flooding and is largely at very low to medium risk of surface water flooding.

4.19 There are no external changes proposed, so no additional hardstanding is proposed. As such, the proposed development would not increase the risk of flooding.

4.20 As concluded at paragraph 7.8 of the supporting Flood Risk Technical Note:

“The current flood risks to McCormack House do not preclude the proposed development, which is appropriate in this location”.

d) Impacts of noise from commercial premises on the intended occupiers of the development

4.21 The character of the area is predominantly residential meaning that the proposed development is entirely compatible with surrounding uses. The adjacent The Spring Arts and Heritage Centre is in a leisure use, which is already adjacent to existing residential properties.



- 4.22 Whilst it is not within the parameters of a prior approval application to consider compliance with development plan policies, it is material that the Site is allocated for residential development as per Policy HB3 (ref H72) of the Havant Borough Local Plan (Allocations, adopted July 2014). As such, it is already established that this is a suitable location for residential development.
- 4.23 In conclusion, there will be no adverse impacts to the intended occupiers of the development from nearby commercial premises.

e) Impact of change of use on the character or sustainability of the conservation area

- 4.24 The Site is located within the St Faith's Conservation Area. For the avoidance of doubt, the Site is not statutorily nor locally listed.
- 4.25 The building is not mentioned in the St Faith's Conservation Area Appraisal (2007). 56 East Street and The Spring Arts and Heritage Centre are both listed as 'Positive Contributors' in the Consultation Draft Conservation Area Appraisal and Management Plan (March 2024), but when read in conjunction with the Heritage Assets and Opportunities for Enhancement Plan, this does not include 56a (i.e. the Site).
- 4.26 The proposed development does not result in any changes to the external appearance of the building. As such, the only potential impact that could realistically arise from the proposed development would be a result of the change of use of the building from office to residential.
- 4.27 However, the principle of the change of use of the Site to residential has already been established by its allocation for residential development as per Policy HB3 (ref H72) of the Havant Borough Local Plan (Allocations, adopted July 2014). As such, the impact of this change of use on the character and sustainability of the St Faith's Conservation Area has already been assessed as acceptable.
- 4.28 In terms of the impact of the change of use, Section 6 (Impact Assessment) of the Heritage Technical Note states:

"The proposed works will change the use of McCormack House from office / business use to that of residential use. This change, however, will not have any impact upon how the conservation area is experienced. This is due to the proposals not having any impact upon the historic layout and character of the conservation area, and they will preserve the external appearance of the building. Additionally, the change of use would secure the long-term viability of a vacant / underused building."

- 4.29 As concluded at Section 7 of the supporting Heritage Technical Note:

"The proposed internal works to McCormack House will not result in any changes to its external appearance or the surrounding landscape. As such, there will be no impact on the setting or significance of nearby heritage assets, including the St Faith's Conservation Area, as well as other listed and non-designated buildings within the immediate vicinity and the defined 250-metre study area. Additionally, the works will not affect any potential archaeological remains in proximity to the site. Given the entirely internal nature of the proposals, the works are assessed to have a neutral impact on the local historic environment."

f) The provision of adequate natural light in all habitable rooms of the dwellinghouses

- 4.30 Each living room and kitchen has at least one suitably sized window and all of the new residential apartments will be dual aspect and have suitably sized windows which will provide appropriate levels of daylight and sunlight to all habitable rooms.



4.31 The supporting Daylight and Sunlight Assessment confirms at paragraph 11.3 that:

“The analysis demonstrates that when applying the recommended methodologies set out in the BRE guidelines, the proposed accommodation will enjoy good levels of daylight and sunlight.”

g) The impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses

4.32 The Site is not located within an area the Council has identified as being important for general or heavy industry, waste management, storage and distribution, or a mix of such uses.

h) where the development involves the loss of services provided by— (i) a registered nursery, or (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006, the impact on the local provision of the type of services lost

4.33 The Site is not a registered nursery nor a health centre maintained under section 2 or 3 of the National Health Service Act 2006.

i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building

4.34 The building is two storeys in height, so the proposed development does not meet the fire risk condition.

Other matters

4.35 As demonstrated in table 1, the proposed apartments will each meet or exceed national minimum space standards in accordance with the requirements of Article 3 (9A) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

4.36 The Site is in the Solent Special Protection Area 5.6km buffer zone. The proposed development would be nutrient neutral to ensure that water quality is not adversely impacted by wastewater from all new overnight accommodation (including those that require prior approval). A Nutrient Neutrality Calculator, EU Mitigation Checklist, and Nutrient Budget is submitted in support of the prior approval application to allow the Council to conduct a Habitat Regulations Assessment. The supporting documentation demonstrates that:

- a maximum water use of 110 litres per person per day will be achieved; and
- it is proposed that mitigation credits to offset the nutrient loading from the proposed development (currently 23.73 kg TN/year) will be purchased from the operators of the Warnford Park nutrient credit scheme. The purchase of credits will be secured via a planning condition; so
- water neutrality will be achieved.

4.37 The applicant is also committed to providing a recreational disturbance avoidance and mitigation package in line with the Solent Recreation Mitigation Strategy.

4.38 As such, the proposed development also satisfies Article 3 (1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).



5.0 Conclusion

- 5.1 The proposed permitted development satisfies the requirements of Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), as well as Articles 3 (1) and (9A).
- 5.2 We thus respectfully request that the Council grants the prior approval sought at the earliest opportunity.





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