

DELEGATED OFFICER REPORT

PROPOSAL	Conversion of ground floor into a care home facility for 6 residents, incorporating some alterations at rear ground floor level, with 3No. supported living flats at first floor.
LOCATION:	18 East Street, Havant, PO9 1AQ
REFERENCE NO:	APP/25/00590
APPLICANT:	Jonick East Developments Limited
APPLICATION TYPE:	Full planning permission
CONSULTATION EXPIRY DATE:	17/12/2025
APPLICATION EXPIRY DATE:	27/10/2025
WARD:	St Faiths
SUMMARY RECOMMENDATION:	Approve with Conditions

1. Site Description

The application site comprises a prominent, Georgian, two storey building, located on the southern side of East Street. The building has sash windows, a traditional shop front across two thirds of the frontage, brick quoin detailing, and the front façade is rendered and painted white. The building is not Listed, but does fall within St Faith's Conservation Area, and due to its historical and architectural interest is considered a Non-Designated Heritage Asset.

The side and rear of the main building is red brickwork, beneath a clay tile roof. The rear has been extensively extended, with largely flat roofed additions in brick. The site extends south to include a rear car park accessed off Twittens Way by a gap in a high brick wall. To the west, between the site and number 14 East Street, is a side alley serving flats at number 14, as well as a side entrance into one of the rear courtyard style gardens of the application site.

The levels do vary across the site slightly, with internal steps and ramps within the building, and the rear gardens set at different levels.

The building was previously occupied by Barclays Bank PLC, but has been vacant since September 2022. There are double yellow lines outside both East Street and Twittens Way.

The surrounding area is generally mixed, with businesses, dwellings, shops, and vacant units (including the site). The site is located within the defined Havant Town Centre but not within any primary or secondary frontage.

The site is outside any current or future flood zone, but part of the site (front) is at risk of surface water flooding in the future.

2. Planning History

17647 – PERMISSION in April 1966 for alterations and additions to Barclays Bank Ltd

17647/1 – PERMISSION in January 1973 for change of use from caretakers flat to banking offices

17647/3 – PERMISSION in February 1983 for installation of cash vending machine

17647/4 – PERMISSION in November 1983 for two storey rear extension

17647/5 – GRANT of LISTED BUILDING CONSENT in September 1983 for part single storey and part two storey extension at rear of Barclays Bank PLC

92/57488/LB – REFUSAL of LISTED BUILDING CONSENT in August 1992 for the installation of antenna to front elevation at Barclays Bank

94/57488/3 – PERMISSION in January 1995 for additional of 3no. air conditioning condensers on rear and side (east) elevations at Barclays Bank PLC

99/57488/5/ADV – ADVERTISEMENT CONSENT in October 1999 for display on non-illuminated projecting globe sign to front (north) elevation.

99/57488/6 – PERMISSION in October 1999 for replacement ATM to front elevation at Barclays Bank

03/57488/008 – PERMISSION in January 2004 for disabled access ramps to side and end elevations, additional steps on end elevation, and replacement ATM at a height suitable for wheelchair access.

04/57488/009 – ADVERTISEMENT CONSENT in March 2004 for the installation of internally illuminated side panel to right hand side column of ATM.

APP/11/01407 – ADVERTISEMENT CONSENT in October 2011 for the installation of 1no. non-illuminated fascia panel sign and 1no. non-illuminated projecting sign.

APP/11/01441 – PERMISSION in November 2011 for the addition of 2no. floor standing condenser units to rear elevation and relocation of 1no. condenser unit to first floor flat roof to replace redundant unit

3. Proposal

Conversion of ground floor into a care home facility for 6 residents, incorporating some alterations at rear ground floor level, with 3No. supported living flats at first floor.

4. Policy Considerations

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the Planning Considerations section of the report.

Havant Borough Local Plan (Core Strategy) March 2011

CS4 – Town, District and Local Centres

CS6 – Regeneration of the Borough

CS7 – Community Support and Inclusion

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 Contributions

DM7 – Elderly and Specialist Housing Provision

DM10 – Pollution

DM13 – Car and Cycle Parking on Residential Development

Havant Borough Local Plan (Allocations) July 2014

AL1 - Presumption in Favour of Sustainable Development

AL2 - Urban Area Boundaries and Undeveloped Gaps between Settlements

DM18 – Protecting New Development from Pollution

DM20 - Historic Assets

DM24 – Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development

Havant Borough Council Borough Design Guide SPD December 2011

Havant Borough Council Parking SPD July 2016

St Faith's Conservation Area Appraisal & Management Plan July 2007

Listed Building Grade: Site not Listed, but others nearby are

Conservation Area: St Faith's

5. Statutory and Non Statutory Consultations

Conservation Officer – see file for full comments & legislative background

Site / Location

The application site is located on East Street in Havant town centre and within the St Faiths Conservation Area. It comprises a vacant, two-storey building, formerly Barclays Bank, which has been extensively extended at the rear. To the rear of the building is a private car park which is accessed from Twittens Way and enclosed by a 2m high brick wall.

The building dates from the mid nineteenth century and contributes positively, together with other historic buildings in this part of East Street, to the character and significance of the St Faiths Conservation Area. Due to its historical and architectural interest, the building is deemed to be a non-designated heritage asset (NDHA).

Assessment

The proposal is for the conversion of the ground floor into a care home facility for 6no. residents, which would include some alterations to the ground floor layout and conversion of the first floor to a further 3no. supported living at flats on the first floor. The proposal also includes renovation of the rear external space to include parking spaces and landscaped garden areas for the residents. The proposal also includes an external fire escape on the rear of the building from first floor to ground floor.

In terms of its historic interest, the building represents a late Georgian/early Victorian, two-storey building with classical proportions, wooden sash windows, a clay tile roof,

a rendered façade, corner brick quoin detailing and a traditional shopfront-style ground floor, including pilasters and a central fanlit doorway. The front elevation is deemed to be of the highest architectural and historic significance. The side elevations of the building are not rendered and display the original red brick facades. These elevations also contain timber framed windows. The rear elevation has been heavily altered by several modern extensions to facilitate the former bank use.

The proposed change of use does not include any alterations to the front, or side facades of the original building. There will be some minimal alterations to the rear and the proposal does include a rear fire escape, which will be attached to the building. It is also proposed to relocate the existing vehicular entrance into the car park further along the existing boundary wall. This wall is not deemed to be of historic interest and therefore this alteration would not result in harm to the conservation area.

Overall, given that the proposed works would not require any physical alterations to the external façades of the main historic building and that the works to the rear are minimum and in keeping with the building, it is considered that no harm would arise to either the NHDA, nor the St Faiths CA.

Conclusion

The proposal would not result in harm to the NDHA, nor the significance of the St Faiths CA and is therefore in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, along with the relevant sections of the NPPF and the adopted local plan.

NO OBJECTION subject to the following conditions:

1. Details of all new external materials (including new windows / doors) to be provided and agreed prior to use.

Building Control – none received
Environment Agency – none received
Environmental Health – none received

County Highways Team

The site is located centrally within Havant and has good access to local services and facilities.

This current application is supported with a Design, Access and Heritage Statement (July 2025) and accompanying drawings.

The Highway Authority is satisfied that the proposed change of use will not result in a material increase in traffic generation or adversely impact the operation of the local highway network.

The Planning Authority, as local parking authority, will need to be satisfied that there is adequate parking available having regards to Adopted Parking Policy and Standards document.

Recommendation

Subject to the Planning Authority being satisfied that the parking arrangements are in accordance with adopted standards, the Highway Authority raises no objection to the proposed development.

Ecologist

Thank you for consulting me on this application. I would not expect the application site to be of significant ecological interest and the proposed works do not appear to entail substantial disturbance of roof materials or any roof voids. I would welcome clarification on this latter point, please.

If it confirmed that none of the roof materials and no roof void areas will be affected by the redevelopment of this site then I would be content that no further ecological information is required. If this is not the case then I would recommend that the applicant carries out an ecological assessment, to be undertaken by a qualified ecologist. The Chartered Institute of Ecology and Environmental Management (CIEEM) (www.cieem.net) holds a database of suitably qualified ecologists. An ecological assessment which will determine whether there is any evidence of protected and notable species, and whether the proposed works are likely to result in impacts to those species. Unless the qualified ecologist can conclude that there is no reasonable likelihood of protected species being present (due to negligible potential) or that if present they are not to be impacted by the works, it is likely that further ecological survey work will be required prior to determination of any application. The results of any further surveys should be used to provide an assessment of the likely ecological impacts of the proposed works and to inform any mitigation, compensation and enhancement measures.

In relation to Biodiversity Net Gain (BNG) the application states that the proposal meets the *de minimis* exemption based on the extent of habitat being affected. I am happy to agree with this statement.

The redeveloped site could readily incorporate ecological enhancement features. I would welcome the inclusion of at least two each of nesting boxes for Common Swift and bat boxes. The two gable ends at the southern elevation would be ideal locations for the nest boxes, and wall-mounted bat boxes could be fitted at first floor eaves level to the building's rear. I would recommend that these enhancement features are secured by the following condition:

The redeveloped site shall incorporate a minimum of two externally mounted nesting boxes for Common Swift and two externally mounted crevice bat roost boxes. These ecological enhancement features shall be installed in suitable locations as per manufacturer's instructions. Reason: to provide ecological mitigation and enhancement in accordance with the Environment Act 2021, NPPF, and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Development Infrastructure Team (CIL & S106)

CIL

The ground floor care home facility will not be CIL liable.

With regard to the first floor supported living flats, the CIL Charging Schedule refers to the following evidence base: 'Extra Care Housing Toolkit published by the Care Services Improvement Partnership'.

Having viewed the 'Toolkit', provided the information contained within the Design and Access and Heritage Statement submitted with the application translate to the plans, the scheme as presented is not CIL Liable as it can be considered Extra Care Housing.

MITIGATION

Pending a response from Natural England on the 'HRA', instructions should be passed by the Case Officer to the CI Team to:

- (a) Issue the **Solent Recreation Mitigation Strategy** Unilateral Undertaking. However, firstly the Case Officer would need to consider the ("Definitive") Solent Recreation Mitigation Strategy (SRMS), details accessed from:
www.havant.gov.uk/unilateral-undertaking-solent-recreation-mitigation-strategy
See extract taken from the strategy below:

6.9. The need for mitigation for the recreational impact of other types of residential accommodation will be assessed on a case-by-case basis by the local planning authority. The key 'test' is based around the likelihood of the proposed development generating additional recreational visits to the SPA(s). For example, in respect of residential accommodation designed specifically for elderly people, a developer contribution (or bespoke mitigation) will be required for apartments for the active elderly, but not for self-contained accommodation such as a residential nursing home for people who are unable to independently leave that accommodation and which does not provide residents parking, allow pets (this would also apply to people living with conditions that limit their mobility). However, mitigation may be required for any staff living on-site. Retirement properties designed for independent living with parking provision and which allow pets will be treated the same as C3 residential properties.

The current scale of charges is available on our website using the link above. The rates are indexed at 1 April each year.

- (b) Issue the **Nutrient Neutrality Unilateral Undertaking**. See <https://www.havant.gov.uk/planning-services/planning-policy/supplementary-planning-documents/nutrient-neutrality/nutrient-0>

Planning Policy

Principle of development

The site lies within the urban area as defined by policies CS17 and AL2 in the adopted Local Plan. There is a presumption in favour of sustainable development in this location subject to other considerations.

The application form states that the proposal seeks to convert the ground floor to a care home facility for people with disabilities for 6 residents, with 3 No. supported living flats at first floor.

Town Centre and Regeneration

The application site lies within the Havant town centre boundary as defined by Policy CS4. The site is currently vacant, having previously operated as a bank, and lies within the allocated boundary for Regeneration under policy CS6, which supports development that positively contributes to the social, economic and physical regeneration of the borough, particularly Havant Town Centre.

Policy CS4 encourages high quality, mixed-use development in designated centres that retain active ground floor frontages. Policy AL3 has requirements for designated primary and secondary frontages, but outside of these, there is greater flexibility for acceptable uses. The site is not in one of these designated frontages of the town centre. The policy also asks for main town centre uses in order to contribute to the vitality and viability of the centres, and while housing is not considered to be a main town centre use under the NPPF definition, the policy does not preclude it.

It is acknowledged that East Street has recently seen an increase in the number of units which previously occupied Class E and town centre uses convert to residential uses.

Therefore, a conversion to a form of residential use in this part of the town centre is considered acceptable in principle.

Specialist Housing

The proposal seeks to provide accommodation for those with disabilities. Policy CS7 supports development that provides services for older people and other vulnerable groups, including extra care facilities.

Policy CS16 supports development which considers the needs of those with disabilities, ensuring safe and convenient access for all; and integrating affordable and supported housing with market housing through tenure blind design to minimise social exclusion and promote social integration. DM7 sets out criteria for development specific to the requirements of people with disabilities and other forms of specialised supported housing provision.

Flood Risk

The National Flood Map for Planning indicates that the site may be at risk of surface water flooding. A flood risk assessment is therefore required, which should consider in detail the surface water risk and drainage arrangements for the site. For the avoidance of doubt, a sequential test is not required, as conversions, including to residential are exempted from the sequential test through paragraph 176 of the NPPF.

Parking

Policy DM13 states that residential development will only be permitted where it provides car parking and cycle storage in accordance with the Council's Parking SPD. The SPD sets out the requirement for car and cycle parking for residential units for adults with learning or physical disabilities. This requirement includes standards for residential staff, non-residential staff and visitors. The proposed ground floor plan shows cycle provision for 6 cycles and 8 car parking spaces, including 1 disabled space, which should be assessed against the required standards, while taking into account the sustainable town centre location.

Heritage

Although the building itself is not listed, it is located within St Faith's Conservation Area with a number of listed buildings located nearby on East Street. As such, due care and consideration should be given to the protection of such assets.

Conclusion The proposal is supported in terms of providing specialist housing for those with disabilities in a sustainable town centre location and occupying a vacant unit within the town centre. It is considered that the proposed development is acceptable in principle subject to detailed considerations including the design in context within the Conservation Area, flood risk and parking arrangements.

County Waste Management Team – none received

Natural England

Natural England considers that without appropriate mitigation the application would have an adverse effect on the integrity of European designated sites.

Your authority has measures in place to manage potential impacts through contributions to an agreed strategic solution(s) which we consider to be ecologically sound. Natural England is of the view that if these measures, including contributions to them, are implemented, they will be effective and reliable in preventing harmful effects on the Habitats Site(s) for the duration of the proposed development. Mitigation measure(s) to offset any positive nutrient budget should be provided within the relevant catchment area(s).

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

A lack of objection does not mean that there are no significant environmental impacts.

Natural England advises that all environmental impacts and opportunities are fully considered, and relevant local bodies are consulted

Nutrients Team

I can confirm there is sufficient capacity in the Council's strategic mitigation scheme to accommodate the application proposals.

It should be noted that there is limited capacity remaining in the Council's mitigation scheme at Warblington Farm. There is alternative mitigation available from third party providers in order to avoid and mitigate the water quality impact arising out of the proposed development. The details of other schemes have been published on the Partnership for South Hampshire's website

at: <https://www.push.gov.uk/work/mitigation-schemes-available-to-developers/>.

6. Publicity and Community Involvement

This application was publicised in accordance with the Council's Local Code of Corporate Governance and the Statement of Community Involvement.

Publicity Type	Publicity Details	Start Date	End Date	Reasons
Press Advert		03/10/2025	24/10/2025	Is in conservation area
Site Notice		01/10/2025	22/10/2025	Is advertised in the public interest; Is in conservation area; Affects a Listed Building and/or the setting of a Listed Building

Neighbouring properties consulted (as defined by the Statement of Community Involvement)

Number consulted: 29; **2 letters received:**

Comment on behalf of Havant Climate Alliance and Havant Friends of the Earth:
We broadly support this repurposing of the Bank building, but wish to raise some issues, hence our neutral stance:
Is the developer working with the care provider to ensure that the development will best meet the needs of service users?
The building needs to be checked for bat roosts.
Is there scope to improve insulation of the building?
We hope that heating will be electrical, possibly by an air source heat pump, and not use gas.
Are solar PV panels planned for the roof, possibly with storage batteries?
Could some bird and bat boxes or bricks be attached to the building?
.....
.....

Correspondence concerning the ownership of the alley between 14 & 18 East Street which had originally erroneously been included in the red line. Amended plans received omitting this alley from the application site.

7. Planning Considerations

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development, Use and Housing position
- (ii) Impact upon Conservation Area and Character of area and non-designated Heritage Asset
- (iii) Impact upon residential amenity
- (iv) Employment
- (v) Access and parking

- (vi) Flood Risk
- (vii) Compliance with Habitats Regulations
- (viii) CIL
- (ix) Ecology and BNG

(i) Principle of development, Use and Housing position

- 7.2 The application site is located within the urban area, as defined by Policy AL2 of the Havant Borough Local Plan (Allocations) and Policy CS17 of the Core Strategy. Therefore, development is considered acceptable in principle, subject to development management criteria. Since the site lies within a Conservation Area then Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant to the determination of this application requiring special regard to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 7.3 In terms of the use of the site, this is currently a vacant Class E bank with associated offices above and the proposal would involve conversion to specialist housing, a 6 bed care home on the ground floor and 3 supported living flats on the first floor. The site is within the town centre where policy CS4 is relevant which seeks to encourage high-quality, mixed-use developments that retain active ground floor frontages. However, the site lies beyond any defined shopping frontage so policy AL3 is not relevant. Policy DM2 seeks to protect shops and community facilities and requires marketing evidence to demonstrate premises are no longer viable. However, the Policy team advise that this policy is worded to relate to the old A1 'shops' and D1 'non-residential institutions' i.e. community facilities; and not A2 'financial and professional services'. Policy DM2 would therefore not apply to this former A2 bank site.
- 7.4 The supporting text to policy CS4 also notes that new homes on upper floors can make efficient use of town centre land and contribute to promoting their vitality and viability. Whilst residential uses on the ground floor is not supported by policy CS4, it is however recognised that East Street has recently had a lot of conversions to residential. It is also noted that the emerging Building a Better Future Plan omits East Street from the defined Town Centre as it no longer performs a town centre function. It is therefore considered that it would be appropriate for the regeneration of East Street to be led by residential development. Taking these factors into account, overall the Policy team advise that the residential use of the whole building in this is part of the town centre is acceptable in principle.
- 7.5 It is further noted that the supporting text to policy DM7 on Elderly and Specialist Housing Provision states at paragraph 10.26 that "It is recognised that the occupiers of some specialist housing often require access to local services including shops and health facilities and public transport routes. Development for sheltered housing, facilities for the active elderly and for the disabled will be encouraged towards locations where these services can be accessed by non-motorised modes of transport so that a degree of independence can be maintained." As a town centre site, close to both the bus station and train station as well as services, it is considered an appropriately accessible site for supported living accommodation.

- 7.6 The Council's Five-Year Housing Land Supply, Updated at April 2025, indicates the Borough's housing land supply position as 1.3 years with a 20% buffer applied. This shortfall engages Paragraph 11d) of the NPPF with its presumption in favour of granting permission unless there are any adverse impacts that would significantly and demonstrably outweigh the benefits. It is accepted that the proposal for 3No supported living flats and a 6 bed care home, within the main urban area of Havant, would make a modest contribution to housing supply and this benefit of the proposal must be afforded weight in the overall planning balance.
- 7.7 It is noted that the building has been vacant since late 2022 and the proposal would bring it back into use. Overall, it is considered that the proposed specialist residential use would be an appropriate use of the building and site, to compliment and help support Havant town centre, subject to other detailed considerations.

(ii) Impact upon Conservation Area and Character of area and non-designated Heritage Asset

- 7.8 The Council's Conservation Officer has been involved in negotiations with respect to this application to ensure that any potential harm to the significance of the heritage asset is fully assessed, and the character of the conservation area is preserved or enhanced, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 7.9 The significance of the St. Faiths Conservation Area is set out in the Conservation Area Appraisal and Management Plan. The St Faith's Conservation Area is focused on the church of St Faith and the survival of a medieval street plan (based on a Roman cross-roads) with its associated expansion of the eighteenth, nineteenth and twentieth centuries. In addition, there is the survival of a small number of industrial buildings reflecting some of the importance of Havant as a small market town with naturally occurring good quality water supplies.
- 7.10 The architectural features of the building subject to this application, particularly the front elevation, contribute positively to the Conservation Area. The proposed change of use of the building would be largely achieved with internal alterations only, with no change to the front elevation. The sash windows would be refurbished and painted. Alterations to the side and rear would be fenestration changes only, with a series of new door openings on the NW elevation. All new windows and doors are shown to be white painted timber which is appropriate for the Conservation Area.
- 7.11 The old vault internally would be retained, but openings made into it, including another window in the west elevation. To the rear a fire escape is necessary and amended plans have been received reducing the visual impact of the fire escape stairwell by making it a tighter structure sited centrally on the rear, descending to the flat roof of the ground floor projection. A cycle store and refuse store are also proposed in the rear car park, against the eastern boundary wall, and the gate entrance into the rear car park would also be re-sited. This is within a modern section of wall, not the original Twittens Wall, and provided the rebuilding is done in materials to match would not have any adverse heritage or visual impact.

- 7.12 Overall the external changes of the amended plans are modest and would not result in any harm to the non-designated heritage asset. The bringing of the building back into use and its associated refurbishment would help to preserve the character of the conservation area in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and would not result in harm to its significance. Therefore, the proposal is considered to be acceptable, meeting the requirements of Policies CS11 and CS16 of the HBLP (Core strategy) and policy DM20 of the HBLP (Allocations).

(iii) Impact upon residential amenity

- 7.13 It is noted that the majority of surrounding buildings are in residential use, particularly at first floor level, and the proposed change of use would therefore be compatible. The function of internal rooms would change, with associated change to outlook. Instead of employees in offices looking out over adjacent properties and amenity spaces during office hours, the rooms would be in residential use. At ground floor level this would have no impact as the site is enclosed by high boundaries; at first floor level a new window is proposed in the east elevation, but as a bedroom the outlook from and any overlooking would be limited. Two of the existing windows in the rear elevation would serve lounge/dining rooms and there is some potential for overlooking towards the residential property sited to the rear, number 5 Twittens Way from these. However the presence of intervening single storey structures, combined with separation distances, and fact that number 5 Twittens Way does not appear to have any private sitting out area, is such that any impact on the occupiers of this property would be limited.
- 7.14 The original plans with large fire escape across the flat roof towards the east half of the site could have resulted in overlooking and noise and disturbance from the use of the fire escape. The revised plans with central fire escape is considered to minimise these concerns. Overall, given the fact that it's a town centre site with existing cross overlooking, it is considered that any additional harm to neighbouring amenity is likely to be limited.
- 7.15 In terms of impacts on future occupiers, the first floor would be supported living flats for single occupancy. Each of the flats exceed the minimum standards set out in the nationally described space standards and have access to adequate light. The first-floor flats do not have any outdoor amenity space that is directly accessible from the first floor, but the ground floor care home does have the benefit of outdoor space. The management of the ground and first floor would be linked, with the potential for residents from upstairs to use the ground floor garden spaces.
- 7.16 The ground floor care home for 6 residents includes a small sensory room, lounge and kitchen area for residents. One of the bedrooms is lit via a lightwell outdoor space, and given the southerly orientation of this should provide adequate light. As noted above garden space would be available for amenity, on two levels, that links to the rear car park.
- 7.17 Overall it is considered that the proposed conversion would provide adequate on site levels of amenity for future residents in accordance with policies DM7 and CS16, whilst not unduly impacting neighbouring residents.

(iv) Employment

- 7.18 The proposed users of the ground floor care facility would be adults with severe learning difficulties requiring 24/7 care. There would always be 2 staff members on duty. The first-floor flats would be occupied by younger adults who require assistance to facilitate independent living, and it is expected that there would be one member of staff on duty during the day and a waking night staff.
- 7.19 Therefore the proposed development would result in some local employment to support the facility, benefitting the local economy.

(v) Access and parking

- 7.20 The site is located within an accessible town centre location, close to public transport links. Vehicular access to the site is from the rear, via Twittens Way, and the proposal would centralise the gate and result in part of the boundary wall being rebuilt to match. Trips to the site are likely to be less than when in use as a bank, and there is no objection on highway safety grounds.
- 7.21 Eight parking spaces, one of which would be a disabled space, are provided, together with a cycle store for 6 bikes. None of the future residents would drive so these spaces are for staff, visitors and servicing only. The Parking SPD notes that an assessment of the parking requirements will be considered on a site-by-site basis for sheltered housing, and nursing homes require 1 space per 8 residents in Havant Town centre. It is therefore considered that the provision of 8 spaces for this 6-bed care home and 3 flats would be sufficient to meet demand.

(vi) Flood Risk

- 7.22 The site lies outside any current or future tidal or fluvial flood zone, but the front part of the site is identified as at risk of surface water flooding in the future, 1 in 1000 year event. The Council's current advice on Flood Risk for an application that is for conversion of buildings where engineering works are internal only within a future surface water flood area is that a sequential approach to siting of development on site should be taken, and no flood risk statement is required.
- 7.23 In this case the area identified as at risk of surface water flooding is largely under the existing building and any new development (cycle and refuse stores) are sited on parts of the site that are not at risk. Overall, it is considered that the proposed development, which is largely achieved with internal works only, would not change the flood risk at the site and the proposal would be safe for its lifetime without increasing flood risk elsewhere.

(vii) Compliance with Habitats Regulations

- 7.24 The proposal would result in the net gain of three, 1 bedroom supported living C3 flats and a 6 bed C2 care home, which needs to comply with the Habitats Regulations. The Council has conducted a Habitats Regulations Assessment (HRA), including Appropriate Assessment (AA), of the proposed development under Regulation 63 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The Council's assessment as competent Authority under those regulations is included in the case file. The screening under Regulation 63(1)(a) found that there was likely to be a significant effect on several Solent European Sites due to both the increase in recreation and the decrease in water quality that would result from the proposed development.

- 7.25 Using Natural England's updated Methodology in January 2024, the planning application was then subject to Appropriate Assessment under Regulation 63. This included two packages of avoidance and mitigation packages. The first is a package of measures based on the suggested scale of mitigation in the Solent Recreation Mitigation Strategy. The second is a package of measures based on the Position Statement on Nutrient Neutral Development.
- 7.26 With respect to the Solent Recreation Mitigation Strategy, it is considered that it is only the occupants of the 3 supported living flats that would be sufficiently mobile to undertake recreational trips. Therefore, SRMS has only be charged for the flats, not the 6 care home residents.
- 7.27 The applicant has entered into a Unilateral Undertaking and paid the appropriate sum of £1,543.80 to address the potential recreational harm from the new development. Therefore, it is considered that the recreational element of the impacts of development have been adequately mitigated against.
- 7.28 With respect to the water quality issue and the Council's updated Position Statement, April 2023, the appropriate mitigation in this instance has been based on the occupation of each flat and care home having a single occupancy only – this would be conditioned to ensure compliance.
- 7.29 The applicant has been able to also enter into the mitigation scheme at Warblington Farm to offset the nitrogen from the development. A Unilateral Undertaking has been received, together with the appropriate contribution of £13,599.90 as nutrient mitigation. This is based on the development achieving a water efficiency of 110 l/p/p/d in the individual flats, and certain flow rates achieved in the care home development that accords with the water efficiency table set out in the Council's Position Statement and Mitigation Plan for Nutrient Neutral Development (August 2025). Appropriate conditions are required to achieve this, together with ongoing compliance.
- 7.30 The Appropriate Assessment concluded that this is sufficient to remove the significant effect on the SPAs which would otherwise have been likely to occur. The HRA was subject to consultation with Natural England as the appropriate nature conservation body under Regulation 63(3) who have confirmed that they agree with the findings of the assessment and raise no further objection. The Council's assessment as competent Authority under those regulations is included in the case file.

(viii) CIL

- 7.31 The development for supported living accommodation in the 3 first floor flats is considered to be Extra Care Housing which, as set out in the Borough's Developer Contribution Guide at paragraph's 2.06 and 2.07 is not charged the residential rate for CIL purposes. Similarly, the accommodation in the care home is not subject to CIL.

(ix) Ecology and BNG

- 7.32 The agent has confirmed that the roof of the property would be unaffected and as such no further ecological information is required. The Council's ecologist is of the opinion that the site could support ecological enhancement features and has recommended the provision of common swift and bat boxes. These can be secured via condition.

- 7.33 In terms of Biodiversity net gain (BNG), this is now a legal requirement for planning permission introduced for small sites such as this (since 2nd April 2024). In this case the applicants have claimed an exemption from the BNG requirements based on the de minimis exemption i.e. 'the development must not impact any onsite priority habitat (defined as a habitat specified in a published list); secondly, the development must impact no more than 25 square metres of onsite habitat with a biodiversity value greater than zero, and no more than five metres in length of onsite linear habitat.'
- 7.34 The Council's ecologist agrees with this statement.

8 Conclusions

- 8.1 Due to the Borough's current housing supply position, paragraph 11d) of the NPPF is engaged which gives a presumption in favour of granting permission unless there are any significant adverse impacts that would outweigh the benefits. As a Heritage asset clause d) i) is relevant. It is considered that there are no policies that seek to protect the heritage asset that provide a clear reason for refusing the development. It is considered that the bringing of the building back into use and its associated refurbishment would help to preserve the character of the conservation area in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 8.2 Furthermore, the provision of 3 supported living units and a 6-bed care home would contribute to the Borough's housing need and represents a modest benefit. There would also be an economic benefit from the conversion process and future employment of support and care staff; as well as a social benefit from the provision of supported living opportunities for people in need in a sustainable location. Overall, it is considered that there are no adverse impacts that would significantly and demonstrably outweigh the benefits and therefore the tilted balance benefit of this development prevails.
- 8.3 The proposal meets the Habitats Regulations with recreational and water quality impacts adequately mitigated against. Overall, the proposal is therefore considered acceptable and recommended for conditional permission.

9. RECOMMENDATION:

That the Development Manager be authorised to Approve with Conditions for application APP/25/00590

Conditions:

1. The development must be begun not later than three years beginning with the date of this permission.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Planning, Design, Access and Heritage Statement updated October 2025
Proposed Ground Floor Site Plan - Drawing number 88-24-PA-10 Rev A
Proposed Ground Floor Plan - Drawing number 88-24-PA-11 Rev A

Proposed First Floor Plan - Drawing number 88-24-PA-12 Rev A
Proposed Elevations - Drawing number 88-24-PA-15 Rev C
Proposed Roof Plan Drawing number 88-24-PA-14 Rev A

Reason: To ensure provision of a satisfactory development.

3. The external materials used in all refurbishment and new works, including the boundary wall infill, shall match, in type, colour and texture, those of the existing building and wall so far as practicable.

Reason: In the interests of the amenities of the area and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

4. The first floor accommodation hereby approved shall be used for Class C3(b) supported living units only, and the ground floor accommodation shall be used as a Class C2 care home only, and for no other purpose in the Schedule to The Town and Country Planning (Use Classes) Order 1987 (as amended) or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order.

Reason: To accord with the terms of the application and in the interests of neighbouring and highway amenity, in accordance with policies CS9, CS16 and DM13 of the Havant Borough Council Local Plan (Core Strategy) 2011.

5. Each of the units of accommodation hereby permitted shall be for single occupancy only with a maximum of 9 residents at the site.

Reason: To accord with the nutrient budget and Habitats Regulations Assessment undertaken at the site as part of the mitigation required, in accordance with Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

6. The cycle store, refuse store and car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be provided, and the car parking spaces marked out, and made fully available for use prior to the development being first brought into use and shall be retained thereafter for their intended purpose.

Reason: In the interests of highway safety and having due regard to policy DM13 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

7. Prior to the first occupation of the hereby approved development, a minimum of two externally mounted nesting boxes for Common Swift and two externally mounted crevice bat roost boxes shall be erected at the site. These ecological enhancement features shall be installed in suitable locations as per manufacturer's instructions and thereafter retained and maintained.

Reason: To provide ecological mitigation and enhancement in accordance with the Environment Act 2021, NPPF, and Policy CS 11 of the Havant Borough Core Strategy March 2011.

8. The 3No supported living flats hereby permitted shall not be occupied until:

(a) A water efficiency calculation in accordance with the Government's National Calculation Methodology for assessing water efficiency in new dwellings has been undertaken which demonstrates that no more than 110 litres of water per person per day shall be consumed within the development, and this calculation has been submitted to, and approved in writing by, the Local Planning Authority; and

(b) All measures necessary to meet the approved water efficiency calculation have been installed.

Reason: There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified 7 that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent. Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. In compliance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the local planning authority has a duty to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council has also had regard to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011.

9. At all times following occupation of the 3No supported living flats hereby approved, all measures for water usage within the submitted nutrient budget shall be maintained in the development in perpetuity.

Reason: There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent. Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. In compliance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the local planning authority has a duty to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council has also had regard to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011.

10. At all times following occupation of the hereby approved 6 bed care home, all sanitary fixtures and fittings which are installed as part of the ground floor development hereby permitted, shall comply with the water efficiency standards set out in table 1 of the Position Statement and Mitigation Plan for Nutrient Neutral Development (August 2025). All measures necessary to meet the approved water efficiency calculation shall be maintained so as to ensure that no more than 110 litres per person per day shall be consumed in the development in perpetuity.

Reason: There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some European designated nature conservation sites in the Solent catchment. The PUSH Integrated Water Management Strategy has identified that there is uncertainty as to whether new housing development can be accommodated without having a detrimental impact on the designated sites within the Solent.

Further detail regarding this can be found in the appropriate assessment that was carried out regarding this planning application. In compliance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the local planning authority has a duty to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council has also had regard to Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011.

11. With respect to condition 7 and the provision of the swift and bat boxes, you are advised that the two gable ends at the southern elevation would be ideal locations for the nest boxes, and wall-mounted bat boxes could be fitted at first floor eaves level to the building's rear.

Informatives:

In accordance with paragraphs 38-50 of the NPPF Havant Borough Council (HBC) takes a positive and proactive approach and works with applicants/agents on development proposals in a manner focused on solutions by:

Offering a pre-application advice service, and
Updating you of any issues that may arise in the processing of your application and where possible suggesting solutions, and,

In this instance:

You were updated about issues after the initial site visit, amended and additional information requested and forthcoming, making your proposal acceptable.