

Heritage Team Response

Date – 10/2/2021

APP/20/01115 and 1116– 6 North Street, Emsworth

INTERIM RESPONSE

In order to provide a full response, I will need to undertake both an internal and external site visit to fully assess the site in its current form and consider how the proposals will impact on the designated heritage assets and the wider environs, from a heritage perspective. However, due to current lockdown restrictions I am unable to carry out these site visits at present.

I am therefore providing interim comments based on a desktop study and an assessment of the proposals and accompanying Heritage Statement by Pegasus Group Ltd November 2020.

To my knowledge, no pre-application advice for the scheme has been sought.

Application site

North Street House is located on the corner junction of Havant Road and the High Street, adjacent to the roundabout which separates the High Street from North Street in Emsworth town centre. The site is located within the boundary of the Emsworth Conservation Area and comprises a detached 2 ½ storey building of late C18 construction. The building is Grade II listed, first being listed in 1952. The listing description is as follows:

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'House, late C18. Stucco, with a tile roof. Symmetrical front (east) of 2 storeys and attic, 3 windows, Hipped roof, with coved and molded plaster eaves. Sashes in reveals. Doorcase with pediment and Doric fluted ½ columns and ½ glazed door. The north side brick wall is bowed, with a sash window'.

The front / principal elevation faces onto North Street. A substantial brick wall extends around the north boundary of the site to a car park at the rear which is accessed from Havant Road. The building itself has had a number of extensions and additions over the years. To the south of the main listed building is a single storey link extension which is attached to the adjacent building. This comprises a 3-storey art deco style development (Central Buildings) with commercial units on the ground floor and residential accommodation on the floors above. The application site is currently in use as the Emsworth Doctor's surgery however, this is due to relocate hence the proposal to find a new use for the listed building and redevelop part of the site.

Proposal

Conversion of existing doctor's surgery to offices, demolition of single storey extension and erection of a three storey building comprising of a retail unit at ground floor and two residential dwellings on the first and second storeys, associated parking and hard and soft landscaping.

Legislative and Policy Context

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

Legislation

Section 66 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

listed building or its setting, to 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.

Historic England Planning Advice Notes

The 'Historic Environment Good Practice Advice in Planning Note 2', states at paragraph 4: 'The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest' and provides at paragraphs 8, 9 and 10 that in order for the Local Planning Authority to make decisions in line with legal requirements, the objectives of the development plan; and, the policy requirements of the NPPF, great importance is placed on understanding the nature, extent and level of the significance of the heritage asset.

National Planning Policy Framework

The revised NPPF (February 2019) sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions in the following paragraphs:

Paragraph 184:

Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraph 189:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 190:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 191:

Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Paragraph 192:

In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

Paragraph 193:

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.

Paragraph 194:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Havant Borough Council Local Plan

With regards to local planning policy, the following policies are relevant:

Policy CS11 of the Core Strategy 2011 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough)

Policy CS11 of the Core Strategy states that planning permission will be granted for development that:

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 of the Core Strategy 2011 (High Quality Design)

Policy CS16 (1a) of the Core Strategy states '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:

Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site’.

Policy DM20 of the Allocations Plan 2014 (Historic Assets)

Policy DM20 of the Allocations Plan 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.

Emerging Policy in the Emerging Local Plan

Policy E13 (Historic Environment and Heritage Assets)

Heritage assets are an irreplaceable resource and consequently great weight will be given to their conservation. Development proposals should, in the first instance, avoid any harm to or loss of the significance of assets and any harm or loss considered unavoidable will require clear and convincing justification, irrespective of the level of that harm.

Assessment

The proposal includes two main elements; the conversion and alterations to the listed building and the erection of a new, 3-storey building adjacent to the listed building, which will be attached to the neighbouring building – Central Buildings.

Conversion / alterations to North Street House – Grade II listed building

With regards to the listed building itself, various alterations are proposed including:

Internal:

- The removal of modern fixtures and fittings
- Sympathetic repairs to existing features
- Removal of modern partitions on GF and FF
- Widening of existing opening between room 1 and 3a/3b and insertion of glazed partition on GF
- Minor removal of walling to facilitate ease of circulation – loft space

External:

- Demolition of side and rear single storey structures
- Hard and soft landscaping including new paving to replace existing tarmac and concrete, the extension of the gravelled yard area to the rear and erection of timber close board fencing to the rear of the new building.

Erection of new three-storey extension to Central Buildings, adjacent to North Street House

- Erection of a three-storey extension to the north flank of Central Buildings, constructed of painted brick with a natural slate roof, 3no. lead covered dormer windows facing north, grey aluminium windows and a traditional style shop front on the ground floor.
- Erection of a bin and cycle store in the alleyway to the south-west of the Listed building.
- The new building would be located 1m from the south elevation of North Street House.

The application is accompanied by a Heritage Statement by Pegasus Group Ltd. This considers the impact of the proposals on the historic environment including the direct impact on the two designated heritage assets, that being the Grade II listed building and the Emsworth Conservation area.

The heritage statement comes to the following main conclusions:

- The proposals would cause a negligible, less than substantial harm to the heritage significance of the Grade II listed building through change to its physical fabric.
- The very low level of harm will arise from the widening of an existing opening at GF level
- Paragraph 196 of NPPF requires balanced judgement to be made which weighs up the harm against the public benefits. These benefits include:
- The enhancement of the special historic and architectural interest of the listed building by restoring its historic plan through the removal of later additions
- Improving the frontage through the replacement of visually unappealing tarmac and concrete with sympathetic paving slabs
- Restoring elements of its internal layout through the removal of modern partitions
- Restoring visibility of one of the historic fireplace surrounds
- Sympathetic repair works to the listed building.
- The proposals will enhance the character and appearance of the CA and improve views in the CA from the north.
- The proposals will soften the appearance of the north flank elevation of the Central Buildings
- The proposed extension will sympathetically blend the host Art Deco style building with the neighbouring late Georgian façade of 6 North Street, whilst restoring the appearance of No. 6 North Street.

Officer Response:

1. There is no objection to the principle of conversion of the listed building from doctor's surgery to offices.
2. The proposed internal alterations appear to be focused on the restoration and enhancement of the listed building which is supported in principle. However, this will be subject to an internal inspection once site visits are able to be carried out.
3. There is no objection to the removal of the single storey link section, or rear single storey extension as these are of no special or architectural interest.
4. The existing extension, whilst of no particular architectural merit, is set back from and subservient to the main listed building. It therefore allows 'breathing space' between the listed building and the much larger adjacent Central Buildings. The new building, which would comprise an extension to Central Buildings, would sit forward of the front building line of North Street House and be of a significantly greater height at 2 ½ storeys, than the existing single storey extension.

5. As the extension would only be located 1m from the south elevation of the listed building, I am concerned that all views of the south elevation of the listed building will be severely restricted due to the scale and massing. This would have a harmful impact on the setting of the listed building.
6. When approaching from the south along the High Street, the new extension would dwarf the view of the listed building in the wider streetscene context, to a much greater extent than it is currently dwarfed by Central Buildings. When approaching from the north, the view of the flank wall of Central Buildings will be replaced with a two-storey flank wall with flat roof dormer windows, which contrasts with the principal front elevation of the listed building.
7. I appreciate that the design approach was to create an architectural bridge between the two buildings. However, the result is a contrived and awkward design which bears little resemblance to either building and as a result of its scale and position, would be highly overbearing on the adjacent listed building. As well as resulting in direct harm to the setting of the listed building, the proposal for the new building would not meet the test of Section 72 of the TCPA which is to preserve or enhance the character of the conservation area.
8. I am of the view that any proposed development in this gap between the buildings will be limited in scope due to the proximity and position of the listed building. It may be possible to propose a single storey addition however this would need to be very carefully designed to avoid any harmful impact.
9. For these reasons I am unable to support the proposals as submitted from a heritage perspective. If a separate application of the conversion of the listed building to offices is submitted, this is likely to receive a more favourable outcome subject to an internal site visit being carried out to assess the acceptability of the loss of historic fabric internally.

Conclusion - Objection

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