

2 Planning History

99/51772/012 - Single storey extension to rear to provide 2 additional surgery rooms., PERM,30/07/1999

99/51772/013 - Single storey extension to rear to provide 2 additional surgery rooms., PERM,30/07/1999

APP/16/00371 - Replacement of metal windows with double glazed aluminium frames to rear elevation of flats 1-4., PERM,10/06/2016

Other current application:

APP/20/01116 - Listed building application for works to convert existing doctors surgery (E) to offices (E) plus erection of a two storey building comprising of a retail unit at ground floor and one residential dwelling (C3) following demolition of existing single storey extension. Associated parking and hard and soft landscaping., DEL,

3 Proposal

- 3.1 Works to convert existing doctors surgery (E) to offices (E) plus erection of a two storey building comprising a retail unit at ground floor and one residential dwelling (C3) following demolition of existing single storey extension. Associated parking and hard and soft landscaping.
- 3.2 During the course of determining this application the scheme has been revised from a three storey building with 2 flats above, sited forward of 6 High Street, to the current reduced proposal. The proposal now comprises the demolition of the existing side and rear extensions; construction of a detached ground floor retail unit of 49sqm with 2 bed flat above, in a gable fronted two storey development that would visually appear connected to Central Buildings (4 North Street). It would be set back in alignment with the Listed Building and its eaves and ridge would match 6 North Street. The separation to the Listed Building would be 1.5m. The conversion of the Listed Building to offices would involve some internal works for which Listed Building Consent is separately applied for under APP/20/01116.
- 3.3 The rear car park would be enlarged through the demolition of the old extension and laid out to provide 12 spaces. The landscaping scheme would include the closure of the frontage dropped kerb, to form an outdoor seating area with renewed paving, low boundary wall and green wall affixed to the side facade of 4 North Street. The existing garden to the north would be largely unaffected by the proposal, except for the proposed removal of 1 Goat Willow tree. An Arboricultural Impact Assessment and Method Statement, as well as ecological Bat Survey have been submitted.

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

- | | |
|------|---|
| CS11 | (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) |
| CS12 | (Chichester Harbour Area of Outstanding Natural Beauty (AONB)) |
| CS16 | (High Quality Design) |
| CS17 | (Concentration and Distribution of Development within the Urban Areas) |

CS21	(Developer Requirements)
CS4	()
CS9	(Housing)
DM10	(Pollution)
DM13	(Car and Cycle Parking on Residential Development)
DM14	(Car and Cycle Parking on Development (excluding residential))
DM2	(Protection of Existing Community Facilities and Shops)

Havant Borough Local Plan (Allocations) July 2014

DM20	(Historic Assets)
AL1	(Presumption in Favour of Sustainable Development)
DM18	(Protecting New Development from Pollution)
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)

Submission Version Havant Local Plan

E23	(Air Quality)
E22	(Amenity and pollution)
E5	(Chichester Harbour Area of Outstanding Natural Beauty)
C4*	(Emsworth District Centre)
E1*	(High quality design)
H1*	(High quality new homes)
E13	(Historic environment and heritage asset)
C7*	(Protection of community facilities and shops.)
E16	(Solent Special Protection Areas)
IN3	(Transport and parking in new development)
EX1	(EX1 Water Quality impact on the Solent European Sites)

Emsworth Neighbourhood Plan Post Examination Version 2020

ENP_M1	(Cycle Storage Provision)
ENP_H1	(Design & Heritage)
ENP_D4	(Design of Public Spaces & External Areas)
ENP_D1	(General Design Policy)
ENP_L1	(General Housing Policy)
ENP_D2	(Height, Mass & Materials)
ENP_D3	(Layout, Form & Density)
ENP_D7	(Mitigate Light Pollution)
ENP_C3	(Public Realm Design)
ENP_C2	(Retail, High Street & Food/Drink Uses)

Listed Building Grade: Grade 2

Conservation Area: Emsworth

5 **Statutory and Non Statutory Consultations**

Building Control

Building Regulation consent will be required for this work

Changes to office area appears to affect MOE provisions with the creation of inner rooms

External means of escape routes should not be affected by adjacent buildings with regards to window locations

Chichester Harbour Conservancy

Fully delegated Officer decision from Chichester Harbour Conservancy

Recommendation – No objection, subject to –

- Securing the Solent Bird Aware recreational disturbance mitigation contributions;
- Secure mitigation for the nitrates increase revealed by the nitrogen/nutrient calculation;
- Tree protection during the build in accordance with the recommendations of the arboricultural assessment;
- Require implementation of the submitted landscape design and ensure that if any planting fails in the first five years, that it would be replaced;
- Biodiversity enhancement measures set out in the Hampshire Ecological Services Ltd March 2021 being implemented to a set timescale and thereafter retained; and,
- Agreeing the facing and roofing materials.

Officer reasoned justification

The Conservancy is supportive of the amended plans that have been negotiated and fully agrees with the Heritage Officer's concerns regarding the originally submitted plans which proposed a very unusual incongruous architectural solution, sitting forward of the adjacent Listed Building.

Officers are pleased to see a detailed soft/hard landscape design has been submitted, which will hopefully give potential for a biodiversity enhancement for the site.

We note the nitrogen budget calculation which will require mitigation to be offered. The Conservancy knows the Council will negotiate this to ensure pressure is not increased on eutrophication in Chichester Harbour, especially now English Nature has described the condition of the SSSI as unfavourable, declining.

The Conservancy notes that the doctor's surgery is not being lost, but is relocating to a site to the north already consented under APP/19/00414, where it can continue to serve the needs of those living in the AONB in Emsworth. The mixed use development/conversion put forward is supported. The character and appearance of the Emsworth Conservation area would be enhanced in compliance with the Development Plan, improving the townscape of this part of the AONB.

Community Infrastructure

CIL Liable:

Additionally, 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, based on the number of additional dwellings and their respective number of bedrooms. See <http://www.havant.gov.uk/unilateralundertaking-solent-recreation-mitigation-strategy>.

Issue the Nutrient Neutrality Unilateral Undertaking. See <https://www.havant.gov.uk/nitrogen-developers>

Conservation Officer - on original submission

INTERIM RESPONSE - OBJECTION

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.

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 graveled 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 submitted 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.

Conservation Officer - on revised plans

FURTHER RESPONSE

Since the previous response, an external site visit has been undertaken and the agent has provided detailed photos of the interior of the listed building, as an internal site visit cannot be carried out at present. This further response is also based on the amended plans and heritage statement received on 4/3/2021.

Assessment

The amended proposal includes two main elements; the conversion and alterations to the listed building and the erection of a new, 2-storey building adjacent to the listed building, which will be attached to the neighbouring building – Central Buildings.

1. 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.

2. Erection of new two-storey extension to Central Buildings, adjacent to North Street House

Erection of a two-storey, pitched roof extension to the north flank of Central Buildings, constructed of painted brick with a natural slate roof, grey aluminium windows and a traditional style, glazed shop front on the ground floor and a residential flat above.

- 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.
- Installation of a green wall on the north flank wall of the Central Buildings.

The application is accompanied by an updated 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.

Officer Response to amended plans:

1. There is no objection to the principle of conversion of the listed building from doctor's surgery to offices. 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.
2. The proposed internal alterations appear to be focused on the restoration and enhancement of the listed building. Where openings are to be made wider, these are areas where the historic fabric has already been lost. The proposed conversion will restore the original layout of the building and remove unsympathetic alterations whilst minimising any further loss of historic fabric.
3. 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.
4. The amended plans show a significantly revised design with a two-storey building which would not protrude forward of the front building line of North Street House. It would feature a traditional style pitched roof and a glazed, traditional shopfront. The Design and Access Statement states that the building will be finished with a brick paint finish. However, it would be preferable to see this as a rendered finish to match with the adjacent listed building. These details can be subject to a planning condition.
5. Unlike the previous design which would have had a harmful impact on the setting of the listed building, the amended design would enhance the relationship between the listed building and the adjacent Central buildings. This is by replacing the existing extension with a simple, yet high quality design which complements the traditional style of the listed building and does not detract from its architectural significance, particularly the front elevation.
6. When approaching from the south along the High Street, the revised design would not detract from the view of the listed building in the wider streetscene. When approaching from the north, the view of the flank wall of Central Buildings will still be visible and will see the introduction of a 'green' wall which will add an attractive and interesting feature into the streetscene.

7. Overall, I am of the view that the amended design would not result in harm to the setting of the listed building which forms part of its significance. It would also meet the test of Section 72 of the TCPA which is to preserve or enhance the character of the conservation area.

Conclusion – No objection subject to the following conditions: _

1. All external materials samples and / or details to be provided and agreed prior to above ground construction.
2. Schedule of works detailing the removal of the existing extension and repair to south elevation of listed building to be provided and agreed prior to commencement of development.
3. Detailed shopfront design to be provided and agreed including materials and window / door details at 1:20
4. Details of the siting and design of any proposed external meter boxes / metal ducting / flues shall be provided and agreed prior to above ground construction.
5. Notwithstanding details provided, details of any new boundary treatments to be provided and agreed prior to above ground construction.
6. Details of all other proposed windows and external doors to be provided and agreed prior to above ground construction. Details to include:
 - a) a 1:20 plan, section and elevation shown in relation to the opening into which it is to be set,
 - b) full size glazing bar section,
 - b) the method of opening and external finishes.All work shall be carried out in full accordance with such approval and be retained thereafter.

County Ecologist

The submitted Bat Survey Report by Hampshire Ecological Services Ltd (November 2020) confirms that the existing doctors surgery has low potential for roosting bats and therefore a single dusk emergence survey was carried out in August 2020, during which no bats were recorded emerging from the building. Therefore, I raise no concerns in relation to the proposals. However, as a single tree is to be felled to facilitate the proposals and in line with the NPPF requirements, I suggest that the below condition is added to the decision notice:

- A minimum of four bird boxes as per the recommendations in Section 5.6 'Outline enhancement measures' of the Bat Survey Report by Hampshire Ecological Services Ltd (November 2020) shall be incorporated into the design of the new or refurbished buildings, along with the planting of a minimum of two native trees in the area of green space in the north-eastern corner of the site. Reason: to enhance the biodiversity value of the site in accordance with NPPF.

The development will result in a net increase in residential dwellings within 5.6km of the Solent Special Protection Areas (SPAs). Therefore, the required scale of developer contributions should be secured at the appropriate stage to ensure no adverse impacts on the integrity of the SPA. Furthermore, the nitrogen budget calculated for the site indicates a positive input into the Solent and therefore a suitable mitigation package will be required to ensure no adverse impacts on the integrity of the designated sites.

Crime Prevention

None received

Southern Water

Exact position of the existing foul sewer/public asset must be determined on site; clearance of 3m either side required to protect from construction and allow for future maintenance; no new development or tree planting within 3m; no new soakaways, swales, ponds, watercourses or surface water retaining or conveying within 5m.

The impact of any works within the highway/access road on public apparatus shall be assessed and approved, in consultation with Southern Water, under a NRSWA enquiry in order to protect public apparatus.

If any sewer found during construction then investigation of sewer required; Formal application for any new connection required.

Surface water discharge should follow Building Regs part H3 hierarchy

Environmental Health - on original submission

Thank you for consulting the Pollution Team on this application. Please note that these comments relate to noise only.

The proposed residential properties are located within an area that is potentially exposed to significant levels of road traffic noise (as indicated by DEFRA noise mapping data). I note there is no acoustic report submitted with this application, and for this reason we recommend refusal.

The applicant should provide an acoustic report in accordance with the guidance contained within 'ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise for New Residential Development (May 2017). The existing daytime and night time noise levels need to be assessed (including night-time L_{Amax} noise levels). Due to a temporary reduction in road traffic noise, predictive methodology using existing road traffic data should be included in the report. A good acoustic design process must be followed which clearly demonstrates in an Acoustic Design Statement how the adverse impacts of noise will be mitigated and minimised and which clearly demonstrates that a significant adverse noise impact will be avoided in the finished development.

The applicant should consider the risk of overheating inside the residential development using the Good Homes Alliance Overheating Risk Tool. Where overheating is identified as an issue and where opening of windows is required to mitigate this, then alternative means of ventilation may be required. However, following a good acoustic design process should allow the applicant to design-out the need for alternative means of ventilation. It is very unlikely that we would accept a development which relies on permanently windows to control noise. The applicant should follow the guidance contained within the 'Acoustics Ventilation and Overheating Residential Design Guide (January 2020)? produced by the Association of Noise Consultants and Institute of Acoustics.

The report should identify whether any existing plant/process will affect the proposed residential development and provide details of what mitigation measures will be used to reduce the noise impact/s.

Environmental Health - on revised submission and noise report

We do not have any objections to the development on noise grounds. However, the proposed residential aspect of the development falls between LOAEL and SOAEL (as referred in GOV planning noise guidance) which means that noise should be mitigated and reduced to a minimum.

We do not have concerns regarding the internal noise condition of the proposed bedrooms as they are N/NE facing and are further away from the road traffic noise.

Our only concern is the internal day time noise level within the combined living room/kitchen area.

Opening of windows is acceptable in order to provide ventilation during periods of overheating, however, what the guidance says is that with higher noise levels the amount of time that a window can be left open is reduced because having the windows open for long periods will increase the exposure time residents have to road traffic noise.

However, I've had a quick look at the guidance again and it would appear that for the east facing lounge that acoustic trickle vents would probably be sufficient in this case. Please condition provision of such.

Hampshire Highways - on original submission

The Design and Access Statement suggests that a Transport Statement has also been submitted, however this does not appear on the planning portal. Until this has been submitted, the Highway Authority cannot provide detailed comments on the application.

The Transport Statement may cover the following, however the Highway Authority raises initial concerns over the following;

- The proposed parking arrangements, whilst a function for the Local Planning Authority to comment on, appears tight in places and the Highway Authority has concerns that five of the proposed spaces will not be able to be used in practice. This may lead to overspill onto Havant Road which would be unacceptable
- The existing dropped kerb on High Street would be made redundant if these proposals were granted and should be reinstated as a full height kerb. Should this not occur, the dropped kerb could increase the opportunity for vehicles to park on the footway if they are using/servicing the proposed retail unit. The applicant should state that they are willing to reinstate the kerb through appropriate highway licence.

Having regard to the above the Highway Authority cannot provide a recommendation.

Officer Note - Agent has confirmed the dropped kerb will be re-instated

Hampshire Highways - on revised proposal

No further comment received

Historic England

Consultation considered un-necessary for proposed development

Landscape Team - on original submission

- We have no objections to the principle of the conversion of the doctors surgery into offices.
- We have concerns with the proximity of the proposed three storey building to the existing grade II listed building. From a landscape perspective the new dwelling is deemed to have a negative impact on the setting of the North Street House. At present the scale, height, and building materials are deemed to be contrary to the following built form strategies and guidelines as stated in the Havant Borough Townscape, Landscape and Seascape Character Assessment;
 - 'Pressure on the subdivision of larger historic properties into multiple dwellings, with increasing demand for car parking in the tight knit urban core, and the loss of authentic internal plan form, layout and architectural detail of important listed buildings
 - 'Conversion of existing vernacular buildings should be carefully controlled to prevent loss of local character
 - 'Any new development within, or adjacent to the historic core should be of a scale and massing in keeping with the historic precedent
 - 'The entrance to Emsworth from the east should be better defined with an improved building edge creating a defined gateway. Improvements also to the built edge adjacent the A259 should be considered
- We echo and support the comments of the conservation officer in relation to the loss of views of North Street House from the south due to the new extension. We also agree that a single storey addition may be achievable but this would need to be carefully considered and must not have a negative impact on the listed building or conservation area.

Natural England Government Team

Thank you for consulting Natural England on the Habitats Regulations Assessment and Appropriate Assessment for the above application.

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question.

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. Please find comments on the mitigation below.

Solent Recreation Mitigation Strategy

Since this application will result in a net increase in residential accommodation, impacts to the coastal Special Protection Area(s) and Ramsar site(s) may result from increased recreational pressure. Havant Borough Council has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be ecologically sound.

Subject to the appropriate financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s). It is Natural England's view that the Solent Mitigation Recreation Strategy Contribution adequately mitigates the effects of the development on potential recreational impacts on the designated sites.

Deterioration of the water environment

The nutrient budget has been calculated in line with Natural England's Advice on Achieving Nutrient Neutrality in the Solent (version 5 June 2020). Provided the competent authority is assured and satisfied that the site areas used in the calculation are correct and that the existing land uses are appropriately precautionary, then Natural England raises no concerns with regard to the nutrient budget.

Please note the calculation is based on all wastewater from the development being treated at Thornham WwTWs. If this situation changes, a reassessment of the nutrient calculation will be required and a revised Habitats Regulations Assessment will be necessary.

In line with Natural England's advice, it is noted that a planning condition will be imposed on any permission to secure that the dwellings shall not be occupied until the Building Regulations Optional requirement of a maximum water use of 110 litres per person per day has been complied with.

It is noted that the approach to address the positive nitrogen budget for this development is via Havant Borough Council's mitigation scheme. We welcome and support this initiative which has scope for nutrient offsetting and biodiversity gain.

Natural England has reviewed the Position Statement and Mitigation Plan for Nutrient Neutrality Development (August 2020) and Warblington Farm Study Evidence Base (Ricardo, June 2020). Natural England concurs with the conclusion of this work that this scheme will deliver effective mitigation for developments draining to Budd's Farm WwTW and Thornham WwTW.

The nitrogen capacity of the land and proposed management of the offsetting land has been discussed and agreed. It is understood that this has been secured through legal agreements to ensure that effective mitigation is delivered for the lifetime of the development. It is also understood that a system has been set up to monitor the developments using the mitigation scheme to ensure there is capacity available for each scheme. Provided this is the case and the long term management of the mitigation scheme is monitored by the local planning authority, as competent authority, to ensure effective mitigation for the lifetime of the development, Natural England raises no further concerns.

It is for the competent authority to determine the importance of timing issues for each development, depending on location and form of mitigation applied. Given the close proximity of the mitigation land to designated sites, Natural England is not expecting any significant timing issues in this case, provided the land is brought into appropriate management at the earliest opportunity. In considering the significance of timing issues within an appropriate assessment competent authorities should take account of the average time taken from the removal of agricultural activities to first occupation and rate of completions for each development. Provided the local planning authority is satisfied that timely mitigation can be delivered in this case, Natural England raises no further comments for consideration.

Nutrient Team, Planning Policy

I can confirm there is sufficient capacity within the Council's mitigation scheme for planning application APP/20/01115.

Planning Policy**Protection of Existing Community Facilities and Shops**

Policy comments are sought in particular on the application of policy DM2 of the adopted plan and CS7 of the emerging Plan to this proposal. Both policies seek to protect existing community facilities and shops, and both policies set out requirements which applicants must meet before such a loss will be supported.

The supporting text to DM2 explicitly includes health facilities in the uses to which this policy applies (paragraph 10.08). Under this policy, the applicant is required to undertake an active marketing exercise to demonstrate the premises are 'no longer viable for their authorised use or any other use which would provide a beneficial facility to the local community'. In addition, alternative provision of the facility must be demonstrated. The new surgery currently under construction a very short distance to the north of the application site clearly meets the second criterion. However, no marketing has taken place to satisfy the former.

Emerging policy C7 contains similar requirements, but they must no longer both be met. As noted above, the replacement surgery clearly meets the requirement under C7a that

'Alternative provision is made available of equivalent or, where possible, greater community benefit which is easily accessible to the community it is intended to serve'. While this policy may only be given limited weight, it does set the direction of travel.

In addition, it must also be considered that health facilities and offices (the proposed replacement use) now both fall into the same use class, class E, since the changes enacted nationally in September 2020.

Taking all these factors into consideration, it is suggested that it would be disproportionate to insist on the requirement for marketing as set out in DM2 in this particular case.

Southern Gas Network

None received

Traffic Management - on original submission

The Traffic Team would be concerned that although the proposed parking allocation for this development appears to be met, we have issues as to the access into and out of these spaces, and that there could be an overspill of vehicles onto the local highway network.

If this development is permitted then the Traffic Team would want a provision to be made for a sum of £5000 (plus the costs associated with advertising the proposals and any works) to be provided by the developer to be set aside from commencement to allow a TRO to be processed ending 5 years from practical completion of the development, to ensure that any parking from the development does not interfere with the capacity, operation or safety of the local highway network.

Traffic Management - on revised scheme

The Traffic Team would be concerned that although the proposed parking allocation for this development appears to be met, we have issues as to the access into and out of these spaces, and that there could be an overspill of vehicles onto the local highway network.

If this development is permitted then the Traffic Team would want a provision to be made for a sum of £5000 (plus the costs associated with advertising the proposals and any works) to be provided by the developer to be set aside from commencement to allow a TRO to be processed ending 5 years from practical completion of the development, to ensure that any parking from the development does not interfere with the capacity, operation or safety of the local highway network

Waste Services Manager

None received

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: 62

Number of site notices: 1 - posted by agent due to Covid restrictions

Statutory advertisement: 12/03/2021

Number of representations received: 1

Comment	Officer Comment
On original proposal:	
<u>1. Materials</u> Note proposed use of white painted brick work; but in the main, the taller white buildings in Emsworth conservation area have front elevations that are rendered and painted white or off-white. (Although often, for cost saving, the side elevations have been left unrendered and but similarly painted.) Being sited between 2 rendered buildings use of white painted brick is inappropriate and should be white painted render to front.	Noted - amended plans received showing use of render

2. Façade

The Heritage Statement claims that "...the proposed extension will soften the visually domineering and detracting north flank of the Central Buildings and serve as an architectural bridge between the Art Deco style block and the late Georgian frontage of 6 North Street by referencing both existing buildings in terms of scale, height and fenestration". In fact, the fenestration on the facade of the new building, in size and in position, draws little from the adjacent buildings. Only the head of the first floor windows follows through from those of 6 North Street.

3. Vegetation

Drawing 10.03B and 10.00A are not consistent. Drawing 10.03B shows the existing climbing shrub remaining in place at the north-east corner of 6 North Street. Drawing 10.00A shows the shrub removed. A relatively minor observation is that, although deciduous, the shrub is valued for adding to the balance of greenery at this south west corner of the cross-roads compared with the other three corners. The Planning Department may consider stipulating that the shrub remains in place. From the practical aspect of allowing space for the new gate to the north garden area, it would surely be possible to prune the lower branches and tie in the upper branches to a support structure or trellis arch, for example.

I do not object to the proposed development as a whole, only the detail points that I have raised above.

Noted and agreed; this original 3 storey scheme now superseded

Conservation Area status protects "trees" with a trunk diameter of over 75mm measured 1.5m above ground level. This climbing plant may not constitute a "tree" for protection.

Whilst its value is noted there are no planning controls over shrubs/climbers.

The revised plans with proposed green wall will further enhance this area

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 and use
- (ii) Impact upon Listed Building, Conservation Area and AONB
- (iii) Impact upon residential amenity, including noise and heating
- (iv) Access and parking
- (v) Landscape (inc hard) and Impact on Ecology
- (vi) Compliance with Habitats Regulations
- (vii) CIL

(i) Principle of development and use

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 and affects a Listed Building, Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are relevant to the determination of this application requiring special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest, as well as 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 Doctors surgery, who are due to re-locate to the former Victoria Cottage Hospital site opposite, which is currently completing works under APP19/00414. Under the revised Use Class Order 2020, the existing site has a lawful use as Class E; and the proposed use of the main building to offices is also Class E. Therefore planning permission is not needed for the use as offices, as no change of use would occur. In this instance this update to national Use Classes supersedes adopted Policy DM2 which would otherwise have resisted the loss of the community facility without appropriate marketing. Policy DM2 also requires alternative provision of the community use which in this case is being met at the Victoria Cottage hospital site. Overall the use of the main building on the site for offices does not require planning permission but is considered acceptable and appropriate to this town centre location.

7.4 Being a Listed Building the associated internal and external alterations do require Listed building Consent and relevant issues are considered under APP/20/00116.

7.5 The site falls within Emsworth District Centre and within the Secondary Frontage Area (Policies CS4 and AL3). The proposed new building would comprise a ground floor retail unit (also Class E) with first floor residential flat and would be an appropriate town centre use with active ground floor frontage. In principle it would compliment and further promote the vitality and viability of Emsworth District Centre in accordance with policies CS4 and AL3 and emerging policy C4.

(ii) Impact upon Listed Building, Conservation Area and AONB

- 7.6 As originally submitted the then proposed three storey development that aligned with Central Buildings to the south and sited forward of the Listed Building at number 6, was considered to dominate and block views of the Listed Building, having an adverse impact on its setting. As a result the plans were significantly revised and now propose a two storey development sited in line with the Listed Building but separated by 1.5m. It would have a simple gable end to North Street with traditional shop front, and its height, eaves and fenestration proportions would match the Listed Building and would replace a single storey linked entrance extension that is of no particular merit.
- 7.7 It is considered that the high quality design would compliment the Listed Building and the separation i.e. removal of existing attached side extension, would allow the original architectural and historical significance of the symmetrical front of North Street House to be more clearly viewed and appreciated. The alignment of the siting of the proposed building with the Listed Building is important in the setting relationship between the two buildings and would not dominate or detract the view of the front of the listed building in the wider streetscene from either the north or south. Third party comment noted the use of painted brickwork would not entirely match most buildings in Emsworth, and amended plans have been received confirming the use of render to match the front facade of the Listed Building. Overall, the siting, simple traditional design and scale of the development, when viewed from the High Street, would not result in any harm to the setting of the Listed Building.
- 7.8 To the rear other existing structures would also be removed from the site, again opening up to view more of the original features of the Listed Building. The proposed rear elevation is also simple with single window serving the stairwell and would be sympathetic to the more functional rear elevation of the main listed building which features multiple openings.
- 7.9 In terms of preserving or enhancing the character of the Conservation Area, the proposal includes the provision of a green wall on the remaining flank wall of Central Buildings. This would break up this blank wall and provide visual interest to a key vista when approaching Emsworth centre from the main roundabout. This would be an attractive and interesting feature in the streetscene that would enhance the character of the Conservation Area. The site is also within the Chichester Harbour AONB and the Conservancy support the mixed use development proposed, noting the improvement to the townscape of this part of the AONB.
- 7.10 Overall, the removal of old extensions of no merit and their replacement with a new high quality detached building of sympathetic traditional design of matching height and proportions, is considered a visual enhancement to the Conservation Area that would not harm the setting or significance of the Listed Building. The proposal is therefore considered to be acceptable, meeting the requirements of Policies CS11, CS12, and CS16 of the HBLP (Core strategy) and policy DM20 of the HBLP (Allocations).

(iii) Impact upon residential amenity, including noise and heating

- 7.11 Upper floors of town centre locations are appropriate for residential accommodation and the proposed 2 bed flat would offer a modest contribution to the Borough's housing needs. Due to the sensitive siting adjacent the Listed Building, design constraints largely limit fenestration openings to the north elevation. Such windows would have a limited outlook over a 1.5m separation to the flank wall of the listed building. Whilst not ideal for future occupiers, the internal layout has achieved secondary room windows with this limited outlook on the northern elevation, with the primary habitable windows serving the living space on the east elevation to North Street. In a town centre location such an outlook is not uncommon.
- 7.12 A noise impact assessment was undertaken (due to Covid restrictions this was done using agreed historic data from a similar site location) to consider the internal noise levels for future residents, mainly from traffic noise. Noise sensitive rooms are located away from the front so that windows can be opened for ventilation. The front living space however will be subject to slightly higher noise levels which could result in behavioural changes that limits the time a window can be left open. Acoustic trickle vents are therefore proposed for these windows and the Environmental Health officer has confirmed that these would be appropriate in this case. Provided these are conditioned, then the proposed acoustic design features are such that it would be unlikely for any adverse impacts from noise or over-heating and the amenity of future residents would be protected. The proposal is therefore considered compliant with adopted policy DM18 and emerging policy E22.

(iv) Access and parking

- 7.13 The existing surgery has a dropped kerb to North Street for 2 parking spaces. These would be lost and the agent confirmed the kerb would be re-instated. This frontage would then become a seating area serving the new retail unit with pedestrian access to the site only. Vehicular access would continue to be taken off the Havant Road (A259) to the rear car park. This is bounded by historic walls and there is no change proposed to the access arrangements. The car park itself would be enlarged slightly through the demolition of the single storey additions and remain a gravel surface. It would provide 12 spaces. This meets the adopted Parking SPD standards which would require 1.3 unallocated spaces for the 2 bedroomed residential unit; 2.45 spaces for the 49 sqm retail unit; and 8.1 spaces for the 243 sqm office floorspace i.e. a total of 11.85 spaces. In addition a secure cycle store would be provided within the new retail and residential unit.
- 7.14 It is acknowledged that some of the spaces are tight to the boundary walls and may be tricky to manoeuvre into, and 2 spaces are provided in tandem. Both the Traffic Team and County Highway Engineer had recommended the need for a contribution towards monitoring of any overflow parking situation and potential Traffic Regulation Order on the Havant Road. This has been discussed and because there is not a shortfall of parking spaces provided to meet current adopted standards, this is not considered justified. The site has been in use as a busy doctors surgery for a number of years and the existing overflow parking problem can't be assumed to continue; adequate on site provision is available for new office users. A Section 106 agreement cannot be used to correct an existing overflow parking problem when the proposed development meets standards. Both the Traffic Team and County Highways Engineer accept the situation but wanted their observations noted.

- 7.15 Overall it is considered the highway access and parking provision on site is adequate for the proposed uses and meets adopted policies DM13 and DM14 and emerging policy IN3.

(v) Landscape (inc hard) and Impact on Ecology

- 7.16 The proposal includes renewed hard landscaping to the site frontage, including new granite sett paths and forecourt area in front of the new retail unit, with seating benches surrounded by a low wall. A green wall is also proposed to be affixed to the flank wall of Central Buildings (Cert B Notice has been served to allow for this fixing). This landscaping would improve the visual setting of the site and provide a functional but traditional appearance to an important gateway vista to the town centre. As such the landscaping proposal is considered appropriate in principle, subject to details that can be conditioned.
- 7.17 Since the proposal includes some demolition at the site of an old building with chimneys, soffit's, dormers and some lifted/slipped tiles etc a Bat Survey was undertaken to check for the potential as a bat roost site. This study found no evidence of bats emerging or entering the building. The report considered ecological enhancements and as mitigation for the loss of one tree, recommends the site could be enhanced for birds with the provision of bird boxes in the garden area to the north. The County Ecologist concurs with the findings and recommendation.

(v) Compliance with Habitats Regulations

- 7.18 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 of eight new residential units.
- 7.19 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.
- 7.20 With respect to the Solent Recreation Mitigation Strategy the applicant has entered into a Unilateral Undertaken and paid the appropriate sum of £571.10 to address the potential recreational harm from the new development. Therefore it is considered that this recreational element of the impacts of development have been adequately mitigated against. With respect to the water quality issue and the Councils updated Position Statement, August 2020, 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 £1,015.80 as nutrient mitigation. This is based on the development achieving a water efficiency of 110 l/p/p/d and to ensure these measures are provided as part of the development, and for ongoing compliance, it is necessary to add 2 conditions.

- 7.21 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.

(vi) CIL

- 7.22 The development is CIL liable for the net additional residential (97sqm) and retail (49sqm) internal floor space, which amounts to 146 sqm; and will be credited for the demolition which totals 126 sqm. The Havant Borough Community Infrastructure Levy Charging Schedule, was adopted by the Council on the 20th February 2013 and followed two public consultation exercises and an Examination into the Charging Schedule by an independent Examiner. The Examiners Report concluded that the Havant Borough Council Community Infrastructure Levy (CIL) Charging Schedule provided an appropriate basis for the collection of the levy in the borough. The CIL Regulations require the use of the national All-in Tender Price Index published by the Build Cost Information Service and this index has now increased to 2020 - 49.107%.
- 7.23 The levy to be charged for this development would be £100 + indexation per square metre on net gain of floor space and calculates as £2,374.71. The Draft Liability Notice has been sent to the agent.

8 Conclusion

- 8.1 The amended proposal comprising works to enable the Listed Building to be re-used for offices with associated demolition; and proposed new retail unit with flat above is considered to represent a visually appropriate and sympathetic design that would not harm the setting of the Listed Building and would provide an enhancement to the Conservation Area. In conclusion, having regard to the presumption in favour of sustainable development and the requirements of paragraph 11 of the NPPF, that planning permission should be granted for such development unless any other material considerations indicate otherwise, it is considered that there are public benefits from the environmental, social and economic dimensions that can be captured from this proposal, and as such the proposal does constitute sustainable development.
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9 RECOMMENDATION:

That the Head of Planning be authorised to **GRANT PERMISSION** for application APP/20/01115 subject to the following 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 Statement, by CPC Ltd, Issue 3 dated 26/02/21
Built Heritage Statement by Pegasus Group Version 3 P20-3044 dated 3rd March 2021

Bat Survey Report by Hampshire Ecological Services Ltd Revision 3 dated March 2021

Transport Statement by tpa Revision C dated February 2021

Nitrogen Budget Calculator dated 26 February 2021

Arboricultural Implications Assessment and Method Statement by Ecourban Arboricultural dated 25th February 2021

Site Location Plan Drawing Number 0.00 rev A

Proposed Site Plan Drawing Number 10.00 Rev B

Proposed Elevations & Street Scene Drawing Number 10.02 Rev C

Proposed Landscaping Plan Drawing Number 10.03 Rev B

Proposed Floor Plans of New Unit Drawing Number 10.01 Rev B

Proposed Floor Plans of Office Drawing Number 10/01 Rev B

Reason: To ensure provision of a satisfactory development.

- 3 Notwithstanding any description of materials in the application no above ground construction works shall take place until samples and / or a full specification of the materials to be used externally on the hereby approved retail and flat development have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of all the external materials, window and doors and guttering and down pipes . Only the materials so approved shall be used, in accordance with any terms of such approval.

Reason: To ensure the appearance of the development is satisfactory 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 No above ground construction works shall take place until details of the hereby approved shop front design including section at 1:20 of the fascia detail and any cornice and corbel detail; stall riser detail and shop display window and door details including materials and colour have been submitted to and approved in writing by the Local Planning Authority. Only the design so approved shall be used, in accordance with any terms of such approval.

Reason: To ensure the appearance of the shop front is satisfactory to the setting adjacent a Listed Building and in a Conservation Area, having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 5 No above ground construction works shall take place until a more detailed soft and hard landscaping scheme for the frontage of the site, that accords with the hereby approved "Proposed Landscaping Plan" Drawing No 10.03 Rev B, has been submitted to and approved in writing by the Local Planning Authority. Such a scheme shall include:

- a) provision of samples and or a full specification of all materials to be used in the hard landscaping for the surface materials, new front boundary walls and benches/seating
- b) provision of elevations and cross sections at a suitable scale showing full details of the front boundary treatment and benches/ seating
- c) provision of details of the green wall including dimensions, method of fixing, support detail, planter dimensions and detail of plants including specification of their species, sizes and numbers
- d) a programme for the timing provisions for completion of the implementation of all such landscaping works.

The implementation of all such approved landscaping shall be completed in full accordance with such approved timing provisions. Any plant that dies, becomes diseased or is otherwise removed within the first 5 years shall be replaced with another of the same species and size in the same position during the first available planting season.

Reason: To ensure the appearance of the development is satisfactory to the setting adjacent a Listed Building and in a Conservation Area, having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 6 The car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be made fully available for use prior to the development being first brought into use and shall be retained thereafter for their intended purpose. The existing dropped kerb to North Street shall be removed and the kerb re-instated to the satisfaction of the Highway Authority prior to the first use of any part of the hereby approved development.

Reason: In the interests of highway safety and having due regard to policies DM13 and DM14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 7 No part of the development shall be first brought into use until a minimum of four bird nesting boxes in accordance with Table 5.6.1 of the Bat Survey Report by Hampshire Ecological Services Ltd dated March 2020 have been provided on site. The boxes shall be retained as such thereafter.

Reason: To provide ecological protection and enhancement in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, NERC Act 2006 and Policy CS11 of the Havant Borough Core Strategy March 2011 and National Planning Policy Framework.

- 8 The windows serving the first floor flat in the front elevation shall be fitted with Acoustic Trickle Vents in accordance with the Airtight & Noisecheck Ltd Acoustic Testing Report dated 12th April 2021. The Acoustic Trickle Vents shall thereafter be retained in working order in perpetuity to the satisfaction of the Local Planning Authority.

Reason: To mitigate any noise and overheating issues in the interests of the amenity of future occupiers, having regard to policy CS16 of the Havant Borough Core Strategy March 2011; policy DM18 of the Havant Borough Allocations Plan July 2014 and National Planning Policy Framework.

- 9 The residential flat 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 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. To ensure that the proposal may proceed as sustainable development, there is a duty upon the local planning authority to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council have had regard to Regulation 63 of the Conservation of Habitats and Species Regulations 2017, Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011, and Policy E14, EX1 and E12 of the Pre-Submission Havant Borough Local Plan.

- 10 At all times following occupation of the hereby approved residential flat, 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. To ensure that the proposal may proceed as sustainable development, there is a duty upon the local planning authority to ensure that sufficient mitigation is provided against any impacts which might arise upon the designated sites. In coming to this decision, the Council have had regard to Regulation 63 of the Conservation of Habitats and Species Regulations 2017, Policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011, and Policy E14, EX1 and E12 of the Pre-Submission Havant Borough Local Plan.