

Heritage Team Consultation Response

Site – Brockhampton West, Harts Farm Way

Application – APP/21/000189

Proposal –

Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.

Background

The application site is located adjacent to the A27 to the north and beyond that, agricultural fields. To the east is the Harts Farm Way Industrial area and to the south is Langstone Harbour. Further north of the site is the Old Bedhampton Conservation which is made of 5 separate character areas. The site was previously used as landfill for a variety of materials.

The site is allocated in the Local Plan for the development of approximately 20,000sqm of employment space.

Proposal

Description above. The application contains three proposed layouts but all with the following elements:

- Maximum external height: up to 18.5m from FFL
- Maximum gross internal floor area: up to a total of 29,000 sqm
- Main vehicular access off Harts Farm Way
- Second point of access to the west of Harts Farm Way
- Existing and bunded landscape buffers around the perimeter of the site

Policy Considerations

National Policy / Legislation

Given the proximity of the application site adjacent to the Old Bedhampton Conservation Area (Character Area 5 – Old Manor Farm Buildings), 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.

The recently published Good Practice Advice Notes 1, 2, 3 from Historic England, supersede the PPS 5 Practice Guide which has now been withdrawn by Government. The Historic Environment Good Practice Advice (GPA) 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.

Of particular relevance for this application, given its location adjacent to the conservation area, is Good Practice Advice (GPA) Note 3 – The Setting of Heritage Assets. This note provides advice on understanding setting, how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. This guidance note also advises that setting is not a heritage asset or a designation in itself, but its importance lies in what it contributes to the significance of the heritage asset.

The National Planning Policy Framework (NPPF) 2019 sets out the policies that the Council must take into account when determining planning applications. The NPPF sets out, in Section 16, the Conserving and Enhancing of the Historic Environment. The following paragraphs are of particular relevance:

- Para. 189 advises that in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.
- Para. 192 advises that 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 economic vitality; and

c) The desirability of new development making a positive contribution to local character and distinctiveness.

- Para. 194 states that any harm to the significance of a designated heritage asset requires clear and convincing justification. It should also pass certain tests depending on the magnitude of harm caused.
- Para. 196 states that where a development proposal will lead to less than substantial harm, this harm should be weighed up against the public benefits delivered by the proposals.

Local Policy

Current Local Plan Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) at section 4, advises that planning permission will be granted for development whereby it 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 DM20 from the adopted Allocation Plan 2014 advises the planning permission will be granted for development that conserves and enhances the historic assets of the Havant Borough and are expected to provide a heritage statement for developments which have the potential to affect heritage assets.

Emerging Policy E13 from the Draft Local Plan 2036 provides similar advice to existing Policy CS11, but also adds that where harm cannot be avoided, mitigation may be proportionate to the impact and the significance of the heritage assets and fully incorporated into the development proposals.

Assessment

A revised Heritage Statement (HS) has been submitted with the application by RPS Planning. This assesses the significance of the nearby heritage assets, that being the Old Bedhampton Conservation Area and the listed buildings within it. The HS then assesses the impact of the proposed development on that significance, including the setting which forms part of the significance.

The HS concludes that the application site does not contribute to the significance of the Old Bedhampton Conservation Area with regards to how the heritage asset is experienced or understood as a historic village with a rural character.

The closest section of the CA to the development site would be the Old Manor Farm – Character Area 5, which sits to the south of Lower Road and framed by open fields which carry on until the A27. Given the proposed heights of the industrial units at 16-18m (approx.), it is likely that these will be visible from this part of the CA. However, given the long distances involved and that the application site is located to the south of the A27, which already forms a physical division, it is considered that the proposals would not result in harm to the designated heritage asset or its setting which forms part of that significance. It is also noted that a landscape buffer will surround the development site which will assist to mitigate its visual impact to some degree.

Conclusion

Overall, it is considered the development would not result in harm to the adjacent conservation area. No objection to the application is raised.

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8/4/21