

## **Heritage Team consultation response**

**Site** – Land south of Lower Road, Havant

**Application** – APP/20/01031

**Proposal** – Development of 50 new dwellings, together with access, landscaping and open space (Revised scheme)

### **Background**

The application site comprises a parcel of land located south of Lower Road in Bedhampton. It is currently used as farmland along with the two adjacent fields. The site is adjacent to the Old Bedhampton Conservation Area (CA), which includes 5 no. character areas. The CA was reviewed in 2019, including a change to its boundary and the inclusion of three further character areas – Bidbury Mead, Bedhampton Road and Old Manor Farm. The closest character area to the application site is Old Manor Farm character area, which is separated from the other areas of the CA. To the south of the site lies the railway line and further south of this is the A27.

The site has been identified as a housing allocation site (Policy H20) in the new Draft Local Plan 2036, which is currently going through the adoption process. It was also proposed as a housing site in the Council's Local Plan Housing Statement 2016, which identified the site in principle for up to 50 dwellings.

There are some site constraints set out in Draft Policy H20 which relate directly to heritage. These are as follows:

- The site is adjacent to the Old Bedhampton Conservation Area
- The Old Manor Farm is adjacent to the north and is of local historic interest
- The site is near the Grade II listed buildings of the Church of St Thomas, the Old Mill House, the Elms, Manor Cottage, Bidbury House, Spring Lawn and Manor House.

The previous application APP/1900427 was also for 50 no. dwellings with access taken from Lower Road. This application was refused by the Development Management Planning Committee on in March 2020. An appeal has been lodged against the decision and is due to be heard at Public Inquiry in February 2021.

### **Proposal**

The current proposal is a revised scheme which seeks to overcome the previous refusal. Overall the scheme proposes the same number of dwellings, based on a similar layout with access still taken from Lower Road and includes a mixture of single storey and two-storey dwellings. In the northern part of the site, the dwellings would be set back from Lower Road with the existing hedgerow retained and include detached dwellings, with single storey dwellings adjacent to the Old Manor Farm buildings. The development includes a central green space and also a landscaping buffer to the rear of the site, which will include an attenuation basin. The footbridge over the railway (not a PROW) will remain in situ. The new dwellings would be of a traditional design, proposing materials such as clay and slate roofs, brick, chimneys, black rainwater goods, timber windows, and timber framed porches.

The main changes are as follows:

- Introduction of a new footpath which extends from the vehicular access, along the west of plots 7 and 10 and north of plots 22-25 to join up with a parking court serving plots (26-28). This results in the development being relocated further into the site, creating a greater

separation buffer from the shared boundary with the Old Manor Farm character area of the Old Bedhampton Conservation Area.

- Recognition and retention of historic track along the east boundary of the site.

### **Policy Considerations**

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.

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 must be proportionate to the impact and the significance of the heritage assets and fully incorporated into the development proposals.

### **Assessment**

With regards to the previous application, the heritage position was as follows:

*The Conservation Area's setting to the south and south west is dominated by open countryside. The Conservation Area derives part of its significance from this setting, which contributes to the rural character of the Conservation Area and is important in supporting its historic separation, both physically and in terms of character, from 20<sup>th</sup> century developments that encroached onto the area.*

*The introduction of new dwellings south of Lower Road, will alter the landscape and increase the urban boundary southwards towards the railway line and closer towards Old Manor Farm, although this will be separated by a narrow landscape buffer and rear gardens of only single storey dwellings. The proposal would also extend development into the wider open countryside setting that contributes to the significance of the Conservation Area, diminishing the perception of largely unaltered rural surroundings.*

*However, as in the case of the impact on the setting of the conservation area, detailed above, it is considered that the overall extent of harm to the setting of the conservation area, would be **less than substantial**.*

*This view is formed by the understanding that the direct impact to the listed buildings and their immediate settings would be low and that the proposed development has been designed in such a way that it would minimise harm (to a degree) through the proposed site layout.*

*The proposed development would be set back from the existing dense boundary hedgerow to the south of Lower Road and would be only marginally visible from further up Lower Road, when travelling south, moving outside of the conservation area boundary. The lowest density of housing is proposed near the Lower Road boundary and this will include extensive landscaping and be well spaced to provide a sense of openness and a rural character. Traditional style materials are proposed which is positive, which appear to be well suited to the palette of materials in the local vernacular.*

*Overall, it is considered the development would not either preserve or enhance the setting of the conservation area subject to 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.*

*However, as the harm to the significance of the heritage asset can be moderated to a degree, it is concluded that less than substantial harm would result. In accordance with NPPF, this is a matter which needs to be weighed against the public benefits of the proposal and the overall planning balance.*

An updated Heritage Statement by Terence O'Rourke Ltd has assessed the impact on the nearby heritage assets including the recently extended CA boundary which now includes Old Manor Farm, which shares a boundary with the CA. It reiterates the measures taken to reduce the impact on the CA which includes; the location and layout of open space, retention of site vegetation and new planting, the landscape strategy, the forms of buildings, orientation and integration of parking areas and the variation of density and provision of setbacks from the road and Manor Farm. The lowest density development is proposed to the east of the site and gardens and hedges have been orientated to add an impression of spatial separation. It advises that the development has been set further back from the boundary with Old Manor Farm in order to preserve the views southwards. The connection to the agricultural and holding will remain with a dedicated farm access provided through the landscaped areas. The rural origin of the buildings and their historic and functional setting therefore will remain legible.

As with the previous application, these mitigation measures are recognised, and it is the view that the changes made to the scheme do not increase the level of harm to the CA which was identified in the first application.

The introduction of a wider landscaping and footpath buffer around the shared boundary with Old Manor Farm is an improvement. However, the number of dwellings remain the same and will still alter the landscape and increase the urban boundary southwards towards the railway line and closer towards Old Manor Farm, although this will be separated by a now wider landscape buffer and rear gardens of only single storey dwellings. The proposal would still extend development into the wider open countryside setting that contributes to the significance of the Conservation Area, diminishing the perception of largely unaltered rural surroundings.

Overall, whilst some improvements have been made and the mitigation measures are still proposed, it is considered that the overall extent of harm to the setting of the consideration area, would be the same as before which is **'less than substantial'**.

### **Conclusion**

It is considered the development would not either preserve or enhance the setting of the conservation area subject to 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.

However, as the harm to the significance of the heritage asset can be moderated to a degree, it is concluded that less than substantial harm would result. In accordance with NPPF, this is a matter which needs to be weighed against the public benefits of the proposal and the overall planning balance.

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