

Heritage Team Response

Date – 15/6/2020

APP/20/00241 – Land adj to Saxted House, 5 Tower Street, Emsworth

Background

Saxted House is a Grade II listed building in residential use. It is located on Tower Street in the Emsworth Conservation Area. The original plot included a very large rear garden which extended towards the harbour. However, planning permission was granted in 2003 to subdivide the plot for the construction of 2no. detached dwellings. Only one of these was implemented and the remainder plot has been left undeveloped for 17 years. The planning permission gave approval for 2no. large detached dwellings of a traditional design, using brick and tile materials. The permission included two new separate accesses from Tower Street to serve the new properties.

Legislative and Policy Context

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

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.

The revised National Planning Policy Framework (NPPF) was published in February 2019 and sets down the policies that the Council must take into account when determining planning applications. 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.

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:

'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.

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.

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.

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.

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

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.

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.

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

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 CP16 (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 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.

Proposal:

The proposal is for the construction of 1no. 5 bed dwelling with a detached garage which has an amended design from the one granted approval in 2003, hence the requirement for planning permission.

The revised dwelling would be in roughly the same position as the previously approved dwelling, albeit with a smaller footprint and a modern contemporary design using a very large glazed projecting gable section, modern style windows and roofing materials.

Officer Response:

Contemporary architecture can work well in heritage settings and provide interesting and innovative schemes when executed well, with the use of high quality materials. It can also be successful when it responds to, or draws inspiration the local context.

However, I have concerns that the amended design does not achieve either with no obvious inspiration from either the adjacent listed buildings, or the traditional style 2003 house already built as part of the original permission. The projecting front gable section appears top heavy and bulky with an overly large glazing area which feels out of proportion with the remainder of the elevation. The side car ports are unbalanced, with differing roof heights. The flint panels are a more traditional feature however, they appear contrived with the combination of the modern style windows with vertical glazing panels. I feel the design needs to be reworked in terms of design features and proportions to achieve a more comprehensible building.

The original consultation response advised that a Heritage Statement is required to be submitted as part of the current application. The reason for this is that whilst there is an extant permission for a dwelling on this particular plot, this permission predates current local planning policy including the Core Strategy (2011) and Allocations Plan (2014) and the introduction of the NPPF and its subsequent revisions. One of the requirements of both the NPPF and Policy DM20 of the Local Plan (Allocations) is the requirement for a Heritage Statement to be provided where a designated heritage asset is to be affected. Whilst the subdivision of the original Saxted House plot and the construction of two dwellings have been accepted, the current proposal is a different design approach to that of the

approved dwelling. It is therefore justified that the impact of the redesigned proposal on the designated heritage assets is assessed.

A heritage statement was submitted on 4 June 2020 however, this is lacking in detail and fails to adequately describe the significance of the assets (that being the adjacent Saxted House and the Emsworth Conservation Area. The use of a listing description alone is not sufficient to draw out the significance of the heritage assets and no mention is made of the Emsworth Conservation Area (CA), of which the CA document makes specific reference to Tower Street. There is also a lack of assessment of the proposal on how the significance would be affected but the proposed development.

Conclusion

There are two main issues. One being the design approach and the other the insufficient heritage statement. I am of the view that the design issues could be overcome and the heritage statement could be amended and expanded to satisfactorily assess the significance and impact on the designated heritage assets. It may be the better option to withdraw the application and resubmit an amended scheme which addresses the above issues? I appreciate this relates to heritage matters only however and not the other planning considerations.

However, if the case officer is minded to refuse the application, then it is requested that a reason for refusal is included relating to insufficient information being submitted to adequately assess the impact on the designated heritage assets and that the proposed development would have a harmful impact on nearby heritage assets.

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