

Heritage Team Consultation Response

Site – Land adjacent to Old Manor Farm, 15 Lower Road, Bedhampton

Application – APP/19/01083

Proposal – Retrospective change of use of existing building from B8 to mixed use of B1/B2/B8 and retention of six external storage bays; and proposed change of use of agricultural land with associated hard surfacing to form circulation and loading area.

Background

The application site is accessed and located to the south of Lower Road on the edge of an agricultural field. The north side of Lower Road is characterised by residential development. To the immediate east of the site is Old Manor Farm which is a complex of buildings, formerly of agricultural use but now converted to residential properties. This building complex has recently been included as an extension to the Old Bedhampton Conservation Area, following its recent review (2019).

The site comprises a flat roof, metal barn style building which has approval for B8 use. It also includes the area to the north and north east of the barn (0.37h in total). This area has been cleared of vegetation (when compared to photos provided on the public register) and now includes 6no. storage bays for 12no. metal storage containers to the north of the barn, some of which are separated by herras fencing to include external storage space.

There is also a large deposit of soil/hardcore on the area to the NE of the barn, immediately adjacent to the entrance into the site from Lower Road. This is not shown/indicated to on the revised location and block plan. The site is partially screened from Lower Road by a row of mature trees and the site itself is set down from the level of Lower Road. Nonetheless, the site and its current state, is clearly visible from Lower Road and from the A27 junction which lies to the west of the site.

It appears from the responses provided by the public, that the physical changes to the application site have occurred over the past year. Previous to this, the site comprised the barn and the agricultural field with the existing tree belt along Lower Road and one further outbuilding.

Proposal

The proposal is to seek approval for the retrospective change of use which has already taken place, including a change of use to the barn itself to include B1/B2 and B8 instead of solely Class B8 use.

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 that 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

Contrary to advice laid out in the NPPF, the application has been submitted without a Heritage Statement, which sets out the significance of any designated heritage assets likely to be affected by the development proposal has been submitted with the application. The submitted D & A Statement makes no mention of heritage as a planning consideration in its scheme assessment. It is therefore important to assess the significance of the designated heritage asset as part of this consultation.

In this regard the designated heritage asset is Character Area 5 of the Old Bedhampton Conservation Area. This comprises the Old Manor Farm Buildings which are of local historic interest. It is an area which is separated from the main conservation area, but has been included as an additional character area following a recent review of the conservation area and its boundaries in 2019. The appraisal describes the area as follows:

'Old Manor Farm Buildings are situated to the south of Lower Road and was built around the turn of the twentieth century. They are a separate character area to reflect their former agricultural use and originally set apart position from the historic centre. The buildings, now converted to residential use, retain the farmyard layout combined with cottage style fenestration to positive effect. This area also includes the original farm worker cottages to the east, also built of distinctive dark red brick'.

The reason for their inclusion is stated as follows:

'These buildings provide insight into the agricultural past of the settlement. Whilst they are no longer in their original agricultural use, they retain some interesting architectural features and the relationship between the buildings is distinctly that of a farmyard arrangement'.

The application site lies adjacent to Character Area 5 and by virtue, forms part of its setting. The wider area surrounding Character 5 of the Conservation Area is dominated by open countryside. The Conservation Area derives part of its significance from this setting, which contributes to the rural character of the area and its agricultural past.

Part of the analysis on the impact on setting, is to establish whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.

The change of use of this piece of land does raise concerns from a heritage perspective. Whilst the existing tree belt along Lower Road does offer some level of screening, the site and the development which has taken place, is clearly visible from public vantage points on Lower Road and the footpath/cycle path on the A27 junction to the west and from the south i.e. the trainline running from Portsmouth eastwards.

The siting of the storage containers appears haphazard, with further external storage clearly visible. The containers are constructed from metal and no attempt has been made to use a colour finish which blends in with the rural character. Whilst the containers themselves may not need express planning permission, the siting of them does. No attempt to provide additional screening around the containers has been provided.

The clearance of the land and vegetation, particularly to the east of the site in the area to be used for circulation and loading, has diminished the verdant and rural character of the site. There is a currently a large mound of hardcore and soil deposited in the eastern part of the site close to the entrance. This is clearly visible from the public vantage point on Lower Road. This contributes to the untidy feel of

the site which in turn harms the setting of the adjacent conservation area. This mound may not constitute development as such, but it is questionable as to why it is on the site and certainly no attempt has been made to screen it from view.

A landscaping scheme is proposed on the amended 'Location and Block Plan V2', which shows a 3.75m wide landscaping belt along part of the north boundary, east boundary and part of the south boundary. However, whilst such a scheme may obscure the Circulation/Loading area from view, it does not extend to the area of the site where the containers are sited. Furthermore, the success of any landscaping would be dependant on the species and nature of the planting used.

With regards to the change of use to the barn, it is not considered that this would directly impact on the conservation area setting, other than its association with the industrialisation of the overall site.

In summary, it is considered that the change of use of the site to include the siting of several containers and the general industrialisation of the site, introduces a use which is visually inappropriate and out of context with the surrounding area. The industrialisation of the site is considered to be harmful the setting of the adjacent conversation area and therefore the significance of the designated heritage asset.

Conclusion

Overall, is it 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 is isolated to one particular site and does not comprise a significant proportion of the wider countryside setting, it is concluded the level of harm caused is ***less than substantial***.

As such, in line with the NPPF, paragraph 196 which states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

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