

From: Steve Lawrence [<mailto:steve.lawrence@conservancy.co.uk>]
Sent: 08 December 2016 12:34
To: Rachael McMurray
Cc: Rosie Spanner; Richard Austin; Richard Craven
Subject: FW: Dolphin Quay Queen street Emsworth PO10 7BU – APP/16/00921

Dear Rachel,

Further to your email dated 17.11.16, timed at 12.12 hours, the Conservancy's Planning Consultative Committee, gave further consideration to the applicant's response to the Conservancy's concerns.

Members were dissatisfied with the applicant's responses and resolved to maintain its objection for the previously advised reasons.

The proposals show a new stepped access over the new sea wall before one reaches the pontoons. The Conservancy is aware of the ramp leading down to the sea wall, but was not referring to that. Is it possible to create 12% (DDA compliant) gradient ramped access over the new sea wall?

The proposals, if approved will further marginalise boating infrastructure and marine enterprise in the Harbour, which does not comply with council policy (Core Strategy Policy DM3) nor the objectives of the conservancy's Management Plan (cross-referenced under Core Strategy Policy CS12) and Planning Principle PP02, recently adopted by the Conservancy on 17.10.16 to assist its internal assessment of such proposals.

The lack of regard to waste-water disposal from berthed vessels is also disappointing, given the loss of an on-site toilet that would result and the ecological sensitivity of the Harbour.

Yours sincerely

Steve Lawrence MRTPI
Planning Officer (Typically Mon/Weds/Thurs)
Chichester Harbour Conservancy
Harbour Office, The Street, West Itchenor, PO20 7AW
01243 510 001
www.conservancy.co.uk

Site: Dolphin Quay, Queen Street, Emsworth

Proposals: Demolition of the single storey shop, two-storey office building and associated outbuildings. Erection of 4 No. houses (3x 3 No. bedrooms and 1x 2 No. bedrooms), fronting onto Queen Street and associated parking and erection of 2 No. detached dwellings (4 No. bedrooms) fronting onto to the Mill Pond with associated parking and access from Queen Street.

Recommendation:

That Havant Borough Council be informed that Chichester Harbour Conservancy objects to the application, as it considers that the scale mass and appearance of the rear, detached houses is considered out of keeping with its surroundings and detrimental to the historic views of adjoining Listed Buildings, particularly the 'Old Flour Mill'. Furthermore, the rear jetted roof balcony/terraces to the front block of town houses are considered to be an alien feature detracting from the character and appearance of the Emsworth Conservation Area. In combination, these design flaws are considered to be symptomatic of an inappropriate overdevelopment of the site. The Conservancy remains disappointed that no amenity facilities for those berthing boats at the south of the site have been considered by the developer.

Conservancy Officers' comments and reasoned justification



1.0 Site and its context

- 1.1 The site lies within the Old Town and Harbour character sub-area 'A' of the Conservation Area. This forms part of the H1 Havant to Chichester Coastal Plain

Landscape Character area, in a study of the AONB commissioned by the Conservancy in 2005, whose relevant key characteristics are listed as:-

- *"Linear historic settlements follow, or are located in close proximity to the Roman Road line of the A259.*
- *Dense urban development of Havant, Chichester, Emsworth and Southbourne.*
- *Occasional views from south of the A259 to the harbour".*

The site itself lies outside of the SPA, SSSI and Ramsar designations, but within 200m of them. There is no boat lift crane at the site, but there is a slipway.



- 1.2 It comprises 3 non-listed buildings, but abuts the Lord Raglan pub and lies to the south and east of/opposite 'The Old Flour Mill' and 29 Queen Street (Dolphin House), which are all Grade II Listed. There is an open pub garden to the rear of the pub. A more recent two storey housing development known as Chequers Quay lies east of the Lord Raglan pub and one public footpath passes through it to reach Queen Street.
- 1.3 Whilst not visible from the outer Harbour, these buildings occupy a prominent position in the street and from adjacent public footpaths and the Slipper mill pond. In overall terms the existing buildings and open yard do not make a positive contribution toward the cultural heritage of the AONB, but do allow long views and vista north of the prominent , Listed, 'Old Flour Mill' in Queen Street. A view from Slipper Road is shown below.

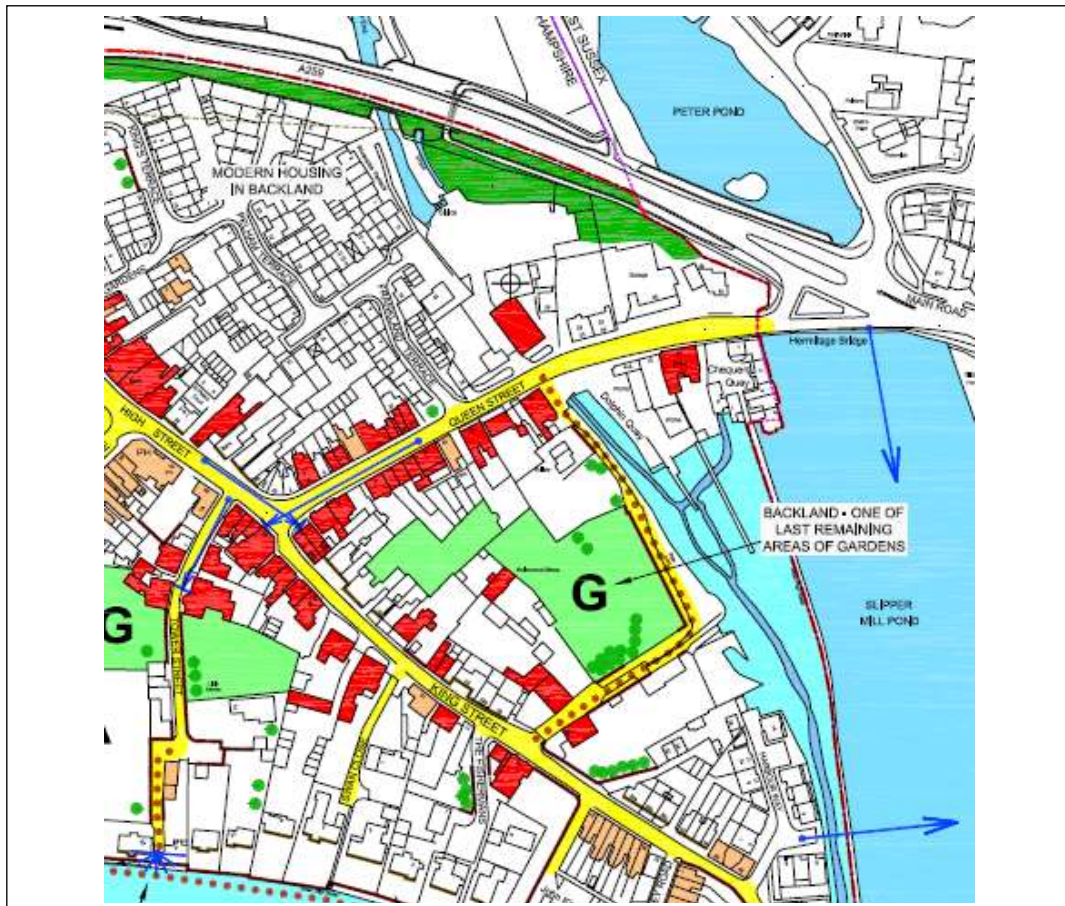


- 1.4 A jetty and various moorings project from the site into what is known as Dolphin Cut, where the River Ems flows into Chichester Harbour, they are owned by the applicant but do not form part of the application site. Access to them would be maintained.
- 1.5 There is a solitary tree on the site, but this is not considered to have either good amenity or ecological value. Surveys of the site have not revealed any protected species to be present and the overall conclusion is that the site has very limited ecological value.



- 1.6 An extract of the Emsworth Conservation Area Character Appraisal Map is shown below. It identifies prominent views down and across the Slipper mill pond.

EMSWORTH CHARACTER APPRAISAL			
KEY:-			
	CONSERVATION AREA BOUNDARY		IMPORTANT VIEW
	COUNTY BOUNDARY		TERMINATED VIEW
	LISTED BUILDINGS		PANORAMIC VIEW
	BUILDINGS OF LOCAL INTEREST(POSITIVE CONTRIBUTION)		WATER FEATURE - NON-TIDAL
	IMPORTANT WALLS (BUILDINGS)		WATER FEATURE - INTERTIDAL
			WATER FEATURE - LOW TIDE



2.0 **Proposed development**

- 2.1 The moorings south of the site are to remain and pedestrian access to them is to be provided through the application site, albeit not with wholly level access, there being a set of steps proposed over the proposed flood defence sea wall.
- 2.2 A residential development of the site is proposed following the removal of all existing buildings. A marketing report, with comments on overall viability of this site to perpetuate marine employment activity has been submitted by the applicant. The applicant has continued to market the site and has produced evidence of this right up to 18.8.16, using a local commercial estate agent.
- 2.3 Served by a single point of vehicular access along the west side of the site, the applicant proposes to erect 2 new blocks of housing: one on the street frontage, the other behind it. A servicing spur would separate the two new blocks. Each block would be raised up and a new flood defence wall would flank the southern and western sides of the site. The development would be served by a total of 25/18 car/bicycle parking spaces respectively arranged underneath each block.

As stated, pedestrian access to the existing moorings would be provided through the site, between the blocks and the Lord Raglan pub. The rear block also appears to be being raised up, with a ramp passing down the east side leading to the private boating berths. The proposed layout is shown below. A public seating area would be provided on the north-western tab of the site and two new trees are shown to be planted.



- 2.4 The front block would be more traditional and simple in its elevational composition, partly built from red stock brick, render and flintwork and whose cropped roof sections would be clad with slate, flanked by plain clay tiles. The block would be 2 storeys high adjoining the Lord Raglan pub 5.2 & 8.0m above pavement level to eaves and roof ridge respectively) and step up to 3 storeys in height, 8.0 & 10m above pavement level to eaves and roof ridge respectively). The block would then step down to two and a half-storeys (upper floor contained in the roof with dormer windows) 6.2 and 8.9m to eaves and ridge respectively. This block would contain 4 houses (3 x 3 bed and 1 x 2 bed [with a study]).
- 2.5 A cantilevered/supported terrace/balcony (glazed balustrade) would project from the rear of the block, providing each dwelling with some amenity space. The front block would take an outlook to the rear block, but there would be no interlooking, owing to the way the accommodation has been laid out in that block. Stepped stoop access points, which are a distinctive feature elsewhere in

Queen Street, would be provided off the street frontage and is consciously part of the flood defences. Details of the front block are shown in the images below, with the former 14/00510 scheme beneath it so Members can see how the scheme has been altered.





- 2.5 The rear two houses (2 x 4 bedrooomed) would be more contemporary in appearance with a gabled boathouse aesthetic and projecting balcony elements providing amenity space for each house and arranged on 3 levels, the ground level providing car parking off the central access spur. The eaves and ridge of the building would be 6.9 and 10m above access spur level. Cladd in standing seam metal on a red brick plinth, elements of the north and south recessed elevations would be clad in timber boarding. Most of the south elevation above ground level would be glazed, albeit broken up by the elevation framework and glazing bars. A contextual section and images of the proposed rear block are shown below, with the last scheme for comparison below that.





2.6 The application has been supported by a number of reports including:-

- Design and Access Statement
- Planning Statement
- Marketing report
- Flood risk assessment
- Context analysis
- Heritage Statement
- Ecological assessment.

2.7 The applicant has continued to market the property during its becoming vacant. Highlights paraphrased from the Marketing Report prepared by Holloway, Iliffe & Mitchell (using their paragraph numbering) reveal:-

4.0 CONDITION

- *All buildings in various states of repair with the small office relatively good order, but still evidence of watermarks on the ground floor where this has been previously flooded*
- *Former antiques centre in poor state internally – previous shop fittings remain and roof is in a poor state of repair which has led to water ingress in many areas*
- *Roof and construction at rear of site would need completely replacing or removing as this is deteriorating and allowing water to percolate into the building*
- *Workshop area is a prefabricated structure and in a terrible state internally – areas of water ingress, issues with electrical supply which looks unsafe, structure and access ways in poor condition and some exposure of steel supports which are rusting. In the opinion of the marketing agency Holloway, Iliffe and Mitchell the building needs to be removed as not viable to repair. No toilet in the building, however an external toilet on site*

6.0 *MARKETING ACTIVITIES*

Variety of activities undertaken:

- *Erection of marketing board on the front of the building in Queen Street*
- *Marketing details in hard copy form at the office and on the agent's website and from other commercial websites that the agent also lists on (11 external websites listed) – we select these for relevance*
- *Marketing details emailed to all applicants on agent's database and to anyone else enquiring*
- *Full colour adverts in THE BUSINESS magazine published by The News*
- *Blanket mailshots to all live applicants*
- *Targeted hard mailers to commercial occupiers in and around the area*

7.0 *MARKET CONDITIONS*

Over the past 12-18 months the general commercial property market has steadily improved – but as with all sectors where buildings are not in good condition, they struggle to be attractive to occupiers particularly where there is too much work for an occupier to do prior to starting their own fit out.

The poor condition of the units has put off virtually all interest that has been in the site. Lack of parking and outside yard space has an impact on the workshop and office premises.

9.0 *ALTERNATIVE USE CONSIDERATION*

Agent's view is that any interest is worth pursuing (unless instructed otherwise) though this may mean an alternative use. Have had an open mind to all types of users who may occupy the site- throughout the marketing period a variety of operators have approached them in relation to the whole site or part thereof.

11.0 *COMPETING MARKET*

Better quality units at other sites in the area:

- *Palmers Industrial Estate*
- *Station Approach*
- *Wren Centre in Westbourne*
- *Hart's Farm Way, Havant*
- *Langstone Technology Park*
- *Langstone Gate*

13.0 *CONCLUSION*

Site is problematic:

- *Flooding issue*
- *State of buildings – only a matter of time before these become dangerous.*

Dilemma – for any landlord to invest in the refurbishment of the site, long term leases would need to be secured. The types of businesses that have been interested are mainly young, small companies who cannot commit to such a deal.

It is the view of the agent that the buildings have reached the end of their economic life and alternative uses should be found for the site in order to allow it to fit into the surrounding environment.

3.0 Relevant planning history

- 3.1 The site was principally used to manufacture and repair timber boats and part was used as a shop to sell antiques. The premises are currently vacant (the boat repairer having left in 2012) and in recent years the site has been badly flooded. This and the limited usefulness of the accommodation has hampered marketing of the site as a boat building yard.
- 3.2 There have been previous proposals to re-develop the site on a mixed residential/smaller boatyard basis. These were presented to a local design review panel but did not find unanimous favour. No planning application was therefore submitted.
- 3.3 A pre-enquiry application was made to the Borough Council in respect of the previous proposals (originally for 13 dwellings). However, no overtures were made to the Conservancy, for its opinion. Revisions were made reducing the scheme to 11 dwellings and a public exhibition held 14.4.2014. As a result of views expressed, further revisions were made and application APP/14/00510 submitted for a quantum of 9 dwellings. Significant amendments were made to the elevational treatment of the rear block and the materials with which it was to be faced, reducing the overall amount of glazing previously designed. A western 'wing' with undercroft providing access to the site was also deleted, to open views of the 'Old Flour Mill' and place the vehicular access to the east side of the site, pulling development away from the Listed Lord Raglan pub.
- 3.4 APP/14/00510 – *"Demolition of the single storey shop, two-storey office building and associated outbuilding and the boatyard. Erection of 4no. houses (3x 3no. bedrooms and 1x 2no. bedrooms) fronting onto Queen Street and associated parking and erection of an apartment building (4 x 2no bedrooms and 1 x 3no. bedrooms) fronting onto to the Mill Pond with associated parking"*. The application was refused for the reasoning in **Appendix 'A'** to this report. An Appeal lodged. The Appeal was later withdrawn. The Conservancy lodged objections on the following basis:-
- "Insufficient efforts have been made to retain, or even partially retain the site in marine employment use, this being the remaining boatbuilding infrastructure in Emsworth with direct access to water and use of a slipway. Also that the scale mass and appearance of the rear, flatted block is considered out of keeping with its surroundings and detrimental to the historic views of adjoining Listed Buildings, particularly the 'Old Flour Mill'. Furthermore, the rear jetted roof balcony/terraces to the front block of town houses are considered to be an alien feature detracting from the character and appearance of the Emsworth Conservation Area. In combination, these design flaws are considered to be symptomatic of an inappropriate overdevelopment of the site"*.
- 3.5 GEN/16/00311 (April 2016) – Pre-application enquiry to the council for demolition of existing buildings and redevelopment to include 4 No. terraced dwellings onto Queen Street and 2 No. detached dwellings to the rear with associated parking. A public exhibition was held to show the revised proposals. Copies of public comments echo some of the concerns below. A summary of conservancy Officer comments was:-
- In principle objection for still not providing sufficient evidence of marketing the site (wholly or partly) for marine enterprise;
 - 2 rear-most dwellings' mass/scale/bulk still considered excessive and harmful to setting of Listed 'Old Flour Mill';
 - Rear balconies for front houses and amount of glazing for rear houses uncharacteristic features.

4.0 **Planning considerations**

PLANNING POLICY FRAMEWORK*

NPPF – 7, 9, 11, 14, 17-23, 47-50, 56-58, 60-61, 64, 66, 69, 74, 93-94, 99-101, 103, 109, 111, 115, 118, 126, 128-129, 131-134, 137, 188; **NPPG** – ID 2b, ID 6, ID 7, ID 8, ID10, ID 18a, ID20, ID21a, ID 23b, ID 26, ID 30, ID 33, ID 34, ID 36, ID 37; **HBLP** – CS8-CS9, CS11-CS12, CS14-CS17, CS19-CS21, DM3, DM8-DM9, DM11, DM17-DM18, DM20, DM24-DM25; **HBSA** – AL1-AL2, DM12-DM14; **CHMP & PG** - LS1-LS2, LS4, HE1, BD1, BD3, NC1, NC5, CD1, CD3, WQ1, WQ4, EW1, EW4, EL3, EG1-EG4 & Guidelines B1a-B3, B8, E8b, I1; **SPG/D**.

4.1 The main issues to be considered relate to –

- (1) Efforts made to perpetuate marine boat building and repair at the site.
- (2) Whether the development is appropriate in terms of its scale/massing/appearance, especially having regard to the desirability of preserving or enhancing the character and appearance of the Emsworth Conservation area and preserving or enhancing the setting of adjacent listed buildings, thereby conserving and enhancing the natural beauty of the Chichester Harbour AONB.
- (3) The public benefits of improving flood defences to safeguard the well-being of those living and working in this part of the AONB.

4.2 The applicant has commissioned a report which sets out that the site has been marketed since becoming vacant to attract marine related business to the site. The only interest expressed during that time has been from a restorator, who lost interest when being told about recent flooding episodes. It is claimed that investors have been put off by this aspect and that the expense of constructing flood defences did not justify their industrial/commercial investment in the redevelopment of the site for its existing authorised purposes. There is now some limited evidence of interest being shown in occupying part of the site to retain some (marine) employment activity at the site has been market tested by the applicant. The Conservancy's own commissioned report by Marine SouthEast into Marine related Business Evaluation (2013) states the following about Dolphin Quay –

"Although there are tidal restrictions on access, large boats can be accommodated.

In addition to the are occupied by the boatyard, the Dolphin Quay site has two buildings fronting Queen Street and to the rear of them a boatshed. One of the buildings was formerly used as office accommodation by an accountancy firm. The other building and boatshed were leased to an antiques business for use as a shop and warehouse facility. Although the boatshed was used for antiques storage, it still retains overhead gantries for boat handling. Pontoon moorings at the rear also belong to the site providing tidal berths for approximately 40 vessels.

In 1996 Tim Gilmore leased part of the site to commence a business restoring and repairing wooden boats. As the level of work increased the company grew to become a team of 6 shipwrights and during this period in invested in equipment and facilities to improve is efficiency.

Due to leasing arrangements Dolphin Quay Boatyard lacked a permanent boatshed. To overcome this the company designed and constructed three steel framed shelters".

4.3 The former boat repair business left the site in 2012 and relocated to Birdham Pool marina, where it continues to trade.

- 4.4 The operator of that business has wrote to the council to object to the last application.
- 4.5 Whilst the applicant has not referenced the Conservancy's Planning Guideline D1b, they have referred to Havant Borough Council's statutory planning policy DM3, which broadly seeks to retain employment floorspace in the Borough.
- 4.6 On strict application of Policy, the applicant has produced a marketing report and persuasive argument as to why it is not possible to retain employment use and specifically employment related to marine industry at the site, with the cost of flood defence works also affecting overall viability.
- 4.7 By the same token the former operator on the site says that it would have been possible for them to have continued to trade at the site.
- 4.8 As to appearance and visual impact, the front block has a n improved elevational treatment over APP/14/00510 and thus blends well with other buildings in the street. Its scale steps up from that of the Lord Raglan pub to 29 Queen Street (Dolphin House). The rear supported terracing/balconies are not a common feature of the area, but do represent an attempt to provide private amenity space on what is a very constrained site, which is difficult to develop.
- 4.9 The rear block is contemporary in appearance, but to my mind, not of appropriate scale and massing, despite being proposed of high quality materials. The amount of glazing is also excessive on the south elevations. The elevational composition has become better detailed throughout the process of consultation and now has a greater symmetry, when viewed from the water/across/down the mill pond. As one approaches the site from the harbour, modern housing development obscures and provides a serial vision before the application site comes into view. There are examples of very architecturally modern new housing and the area is not so homogenous in its appearance that contemporary design could not be entertained at the rear of the site.



- 4.10 In overall terms, I consider re-development could provide an enhancement of the character and appearance of the Emsworth Conservation area. However, 3.19 from the Conservation Area Appraisal reminds us that: -

"The overwhelming townscape image of the Conservation Area's built form is that of the 18th century, both in terms of period buildings mostly abutting the pavements and the use of materials. The majority of buildings are built in a vernacular style, on a domestic scale with the exception of the industrial buildings. But even these reflect the smaller dimension associated with the locality and local materials. Elevations are generally in red stock brick, but sometimes this is painted, together with examples of painted smooth rendering (stucco) roofs of the early 19th century. Plain clay tiles predominate for roofs and Welsh slate appears with the Regency Period at a shallower pitch".

- 4.11 Whilst others say that it may still be possible to introduce further improvements to the architecture, the test really is whether the tabled proposals are of sufficient merit and positive impact to the Conservation Area and wider AONB to allow support for this element of the planning considerations.
- 4.12 The front block appropriately steps up from the Lord Raglan pub to the greater distant scale of 29 Queen Street, whilst remaining subservient to the scale of the 'Old Flour Mill'. Its materials and detailing fronting the street are considered appropriate. However, the jetted terracing providing first floor balconies to the rear are still considered alien.
- 4.13 Whereas the applicant has made some efforts to redesign the rear block, its overall scale, massing and degree of glazing are not considered appropriate and would interfere with the vista of the 'Old Flour Mill' when walking north along the public footpath towards Chequers Quay. Paragraph 3.22 of the Conservation Area Character Appraisal reminds us that:-

"Views: The history of Emsworth is inextricably linked with the harbour, although the association between the town and the waterfront has changed from its earlier commercial base to one largely related to tourism and recreational sailing. This waterside activity and related services are still an important part of Emsworth's character".

- and paragraph 56 stating -

"5.6 The design of any new buildings will also need to be sensitive to the scale and character of the site and the area and show imagination – building upon the existing urban form, details and materials. It is important to respect and maintain the building lines particularly within the medieval street pattern and elsewhere within the Conservation Area".

The Emsworth Village Design Statement offers similar advice and planning guidelines, especially 'Built environment' design considerations 4 and 7.

- 4.14 The remodelling of the sea wall at this part of the site would also cause the loss of the existing slipway and toilet block. The former allows others to launch small boats.
- 4.15 It is clear that catastrophic flooding has occurred at the site in the past and that the tabled proposals would help to remedy that as required by DM25 from the Local Plan.

5.0 Conclusions

- 5.1 Officers now consider that sufficient efforts have been made to establish whether a viable employment or mixed use development could be provided on the site, which could retain part of the site for marine related employment purposes. As

such, it is asserted that the full requirements of Conservancy Planning Guideline D1b and Local Plan Policy DM3 have now been met. Conservancy Officers are still disappointed that boating infrastructure will be lost at this site and that efforts have not been made to provide those using the private berths at the end of the site with a small amenity block to provide a toilet and shower for example.

- 5.2 Notwithstanding the public safety benefits that may accrue from the new flood defence works, acknowledged by the Environment Agency, there are also certain aspects of the development which are symptomatic of the proposals being an overdevelopment of the site, which have been set out above. An objection should therefore still be raised to this application.

SRL for 17/10/16 Planning Consultative Committee

Comments requested by: 13 October 2016, with extension of time granted by HBC for CHC to comment from today's meeting.

*Abbreviations used:-

NPPF – National Planning Policy Framework (2012)

NPPG – National Planning Practice Guidelines (2012)

HBLP– Policies from Havant Borough Local Plan (Core Strategy)(2012).

HBSA - Havant Borough site Allocations DPD (2014)

CHMP & PG – Chichester Harbour Management Plan (2014-2019) & Planning Guidelines (as amended 2011-2013)

SPG/D – Supplementary Planning Guidance/Documents/Evidence:-

- Chichester Harbour AONB Design Guidelines for New Dwellings and Extensions (2010)
- Havant Borough Council - Borough Design Guide - Supplementary Planning Document (December 2011)
- Emsworth Village Design Statement (2008)
- Emsworth Conservation Area Character Appraisal/Management Plan (2010)
- HBC Residential parking and cycle provision SPD – March 2010
- Marine related business evaluation Phase 1 – Marine SouthEast (March 2013)

For ease of reference CHC Planning Guideline D1b reads:-

*"**POLICY D1b:** The Conservancy is likely to raise an objection to the redevelopment of marine-related sites for non-marine business uses, unless it can be demonstrated that the site is not fit for purpose and that a predominantly marine-related business use is not viable. In all cases, proposals should not have an adverse impact on the landscape and nature conservation interests of the AONB. Applicants should take the following sequential approach and refer to 'Requirements of Marketing' below:*

1. *In the first instance, the site should be marketed for marine-related business use (for large and/or small units);*

2. *If this fails, the site should be marketed for a mix of marine-related business use and/or other appropriate commercial/employment uses which are capable of reversion to marine-related use in the future;*
3. *Only if both of the above steps have failed, will other uses such as housing be considered. In these instances, an appropriate mix of housing and marine-related or other appropriate commercial/employment use(s) may be acceptable, provided:*
 - *it can be clearly demonstrated with evidence that the residential element would be necessary to make the scheme viable in financial terms;*
 - *any proposed non-marine-related employment use is capable of reversion to marine-related use in the future;*
 - *the marine-related or other appropriate commercial/employment use(s) are of a scale and type that would be viable and sustainable in the long-term (a sufficiently detailed Business Plan should be provided to help demonstrate this);*
 - *it can be demonstrated that the proposed uses are compatible with each other and the site.*
4. *Redevelopment of an existing or historic marine-related site with an entirely residential use is unlikely to be acceptable, unless and until the previous three steps have been taken and evidence provided that the site is no longer fit for purpose for marine-related or other appropriate commercial/employment uses”.*

Appendix 'A' – Dolphin Quay Report: Reasons for refusal to APP/14/00510

- 1 The application site is within the Emsworth Conservation Area, it occupies an important and prominent location and forms an important part of the setting of several listed buildings in the vicinity and is within the Chichester Harbour Area of Outstanding Natural Beauty (AONB). The proposal, by reason of its scale, mass and design is considered to be excessive and inadequately related to the scale, character and design of surrounding development. It would constitute an incongruous and strident form of development, out of keeping with its surroundings, which would seriously harm the appearance and character of the Conservation Area, the setting of listed buildings and the character of the AONB. The loss of space would also reduce important views which provide visual connection between Queen Street, including the setting of the former Flour Mill building to the north, and the Harbour. As such it is contrary to national and local planning policies for the area, in particular the National Planning Policy Framework 2012 and Policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011. These policies are further amplified in English Heritage Guidance: The Setting of Heritage Assets (2011) and the adopted Supplementary Planning Document: Havant Borough Design Guide (2011) and the related Conservation Area Character Appraisal and Management plan for Emsworth (2010), also in the extant Practice Guidance to the former National Planning Policy Statement PPS5: 'Planning for the Historic Environment' and National Planning Practice Guidance (2014), including: 'Conserving and Enhancing the Historic Environment' and 'Natural Environment'.
- 2 On the basis of the information submitted, the Local Planning Authority is not satisfied that it has been demonstrated that the site is no longer fit or is unsuitable or financially unviable for employment uses and the use of a shop; the Authority is not satisfied that a suitable comprehensive marketing exercise has been carried. Therefore the proposal is contrary to policies DM2 and DM3 of the of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.
- 3 On the basis of the information submitted, the Local Planning Authority is not satisfied that clear arrangements and responsibilities would be in place to ensure that adequate defences against flood risk would be put in place as part of the proposed development. Therefore the proposal is contrary to policy CS15 of the of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.
- 4 In the absence of binding arrangements to secure a contribution towards the Solent Disturbance Mitigation project, the proposal would not ensure that provision is made for mitigation of significant effects of development upon nearby designated area for nature conservation: Special Protection Area (SPA). The proposal is therefore contrary to the policy CS11 of the Havant Borough Local Plan (Core Strategy) 2011 and policy DM24 of the Havant Borough Local Plan (Allocations) Submission Document (2013) and the National Planning Policy Framework 2012.
- 5 In the absence of binding arrangements for the provision of 'affordable housing', the proposed development is contrary to policy CS9 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.