



Ms Rachael McMurray
Planning Development
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant, Hampshire
PO9 2AX

Sent by email: representations@havant.gov.uk

6 July 2015

Our ref: 15 07 01

Dear Ms McMurray,

45a Portsdown Hill Road, Havant, PO9 3JU
Planning application ref: APP/15/00598

The above planning application has recently been brought to the attention of the Twentieth Century Society, and we write to register our objections to the proposals for the reasons outlined below.

We are concerned at the nature, scale and form of this application which in our view will cause substantial harm to the setting of the dwelling on the adjacent plot, No 47, Sunspan. This dwelling was built in 1936 to a design by one of the foremost architects and designers of the Modern Movement in Britain, Wells Coates, and was listed in 1994 as of special architectural and historic interest by English Heritage (now Historic England) at Grade II. The Society holds this building in very high regard - we have organised tours of the property for our members on two occasions, in the 1990s and in 2013. Whilst the application now proposed will not harm the physical fabric of the building, being on a separate plot, it would adversely affect the setting of this remarkable listed building.

Wells Coates was the first Chairman of the MARS Group (Modern Architectural Research) set up in April 1933 which aimed to revolutionise the approach to architecture in Britain as part of an international desire for progress in the fields of architecture and town planning. Its members included almost all of those now recognised as having pioneered modern architecture in this country including Maxwell Fry, Serge Chermayeff, Berthold Lubetkin, A D Connell, Colin Lucas, Basil Ward, Leslie Martin, Raymond McGrath and F R S Yorke.

Having made his name with the design of the Lawn Road (ISOKON) Flats in Hampstead (1929-34), recognised today as outstanding by their Grade I listing, Wells Coates moved into a wider range of residential designs. Dismayed by what he saw as the dull and uninspired design of the private suburban housing being built in Britain at this time, he developed a model which could be adapted

almost infinitely to any site, rural or urban, estate or individual plot, and in any position. Internally its accommodation was completely flexible both in terms of size and layout, but its key was that the large living room spans two sides of the square plan, thus enabling it to receive the maximum amount of sunlight. For that reason this design was named the Sunspan House and explains why this particular house was built diagonally on this south facing plot.

Sunspan is a designated heritage asset within the meaning set out in the Glossary to the National Planning Policy Framework. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the PLBCA Act) requires a decision maker, when deciding 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. Given that the proposed development at 45a Portsdown Hill Road would be on the immediately adjacent plot and the west side wall of the proposed building is shown as barely 1.4m from the eastern corner of Sunspan, there can be no doubt that the proposed development lies within the setting of this listed building.

In *Barnwell Manor Wind Energy Limited v East Northamptonshire DC*, the National Trust and SSCLG [2014] EWCA Civ 137, the Court of Appeal held that, in discharging the statutory duty under Section 66(1) of the PLBCA Act, the decision maker has to give considerable importance and great weight to the desirability of preservation of the setting of a listed building when carrying out the balancing exercise of weighing harm to the listed building or to the setting as against public benefits. This judgment confirms the advice of paragraph 132 of the NPPF, which says “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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.” The latter is the case here.

The significance of Sunspan is as an unusual survivor of the earliest Modern Movement architecture in Britain. Its form is strikingly original and its neat clean lines, which are horizontal in emphasis, uncluttered and sleek appearance make it stand out as an exemplar building of 1930s innovation in architecture. That it was designed to revolutionise mass market speculative housing adds to its significance as a heritage asset. Whilst it is set in a fairly narrow plot which its diagonal orientation almost occupies, its setting encompasses the land on either side as well as the roadway in front and an extensive area of open land to the rear. To be appreciated as a piece of important modern architecture it is vital that this setting is maintained.

We would argue that the proposed dwelling on No 45a would, by reason of its mass, height, bulk and proximity to Sunspan, appear dominant, overbearing, out of scale, intrusive and completely out of character with the form and nature of the neighbouring listed building. There appears to have been little thought as to how the proposed three storey building would relate to the height and form of Sunspan and how it would appear from Portsdown Hill Road. Similarly, in long views towards Portsdown Hill Road from lower land to the south, the gross bulk and form of the proposed building will be wholly out of character with Sunspan. The existing bungalow on the site, whilst not of architectural merit, at least has the benefit of being low and horizontal in its setting, appearance and massing, so that in those respects it echoes Sunspan and does not harm its significance. The proposed building appears to have been designed in isolation from the site, its context, and especially of Sunspan and its significance as a heritage asset of great importance.

In the light of these considerations we conclude that the proposal would cause substantial harm to the setting of Sunspan. We believe our conclusion accords with the guidance in the NPPF on how to assess if there is substantial harm to a heritage asset. That being so, the advice of Paragraph 133 of

the NPPF applies, so that consent should be refused unless it can be demonstrated that substantial public benefits would arise from the proposed development which would outweigh that harm. In this case absolutely no public, as opposed to private, benefits are claimed by the applicant. Nor do any of the bullet points in paragraph 133 apply here and it must therefore follow that consent should be refused.

I trust these comments are useful to you in your consideration of the planning application. Should you have any queries, please do not hesitate to contact me at this office.

Yours sincerely,



Henrietta Billings
Senior Conservation Adviser
Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.