

Havant Borough Council
Heritage Consultation Response

Date – 20/4/2026

Application – APP/25/00162

Site Address – Land and coast adjacent to, Langstone Road, Havant

Proposal:

Flood and coastal erosion risk management scheme comprising a combination of raised earth embankments, raised footpaths/cycleways, sheet piled sea/flood defence walls with cladding and flood glass, provision of flood gates, associated landscaping and landscaping improvements (including street furniture), tree works and tree removals, realigned sections of cycleway/walkway, highway alterations and improvements, ecological improvements and temporary compounds and access, and all associated works. The proposal constitutes EIA development.

Application Site

The application site includes a series of coastal frontages stretching along both Chichester Harbour and Langstone Harbour. To the west of Langstone Road, the application site falls within the Mill Lane Conservation Area (CA) and to the east, it falls within the Langstone CA, which also includes several listed buildings and two buildings which are included on the Council's 'List of Buildings of Local Interest'. The application site boundary also falls slightly within the Wade Court CA, however, no works are proposed within this CA.

Proposal

The application proposes the provision of flood defence works, along part of Langstone Harbour to the west and Chichester Harbour to the east. The application has been submitted by the Havant Borough Council Coastal Team. The proposed flood defence works are separated into a series of frontages numbered 1-5, which are described in turn below.

- Frontage 1A: Billy Line North – provision of a raised earth embankment along part of the Billy Line cycleway. Existing cycle path to be upgraded to a new 3m wide shared path on top of flood embankment.
- Frontage 2: Billy Line South – provision of a sheet-piled wall and raised earth embankments where defence alignment needs to cross existing utility pipes. Existing cycle path to be upgraded to a new 3m wide shared path which sits adjacent to sheet-piled wall.
- Frontage 3: A3023 road to 9 Coastguard Cottages (The Look Out) – Provision of a continuous flood defence, comprising of 4no. flood defence structures including; A3023 flood wall, Ship Inn car park raised earth bund, the Ship Inn flood wall and Ship Inn annexe flood wall. A flood gate also proposed between the Ship Inn and the Ship Inn annexe flood walls.

- Frontage 4: The Look Out to No. 24 Langstone High Street (the Winklemarket) – Provision of new reinforced concrete flood wall in front of the existing garden walls that run along the frontage. The existing footpath is to be updated to a new 1.5m wide footpath through the construction of a new quay wall. One flood gate (at Green Cottage) and one demountable flood barrier (at pedestrian access adjacent to the Watch Tower) will be provided to ensure robust continuity of the defence.
- Frontage 5: Langstone High Street to the field north of the Royal Oak – provision of a continuous flood defence that largely comprises of five structures. These structures include the High Street flood gates, the Royal Oak flood wall, the allotment flood wall, the Footpath flood wall that runs west of the Mill Pond and an earth embankment in the field north of the Royal Oak. Demountable flood barriers will be provided between the section transitions and flood gates will be provides at No. 21 High Street.

Legislation

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

Planning (Listed Building and Conservation Areas) Act 1990

Legislation and Policy Context

In assessing the proposal, the following legislation and policy framework has been taken into account:

Planning (Listed Buildings and Conservation Areas) Act 1990

- Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building, 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 local planning authorities, when exercising their planning functions in respect of development affecting a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (revised December 2024)

Chapter 16 of the National Planning Policy Framework (NPPF) relates to Conserving and Enhancing the Historic Environment (paragraphs 202–221). The following paragraphs are most relevant to the determination of this application:

- Paragraph 212 states that:

“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.”

- Paragraph 214 states that:

“Where a development will lead to substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless it can be demonstrated that the harm is necessary to achieve substantial public benefits, or certain specified criteria are met.”

- Paragraph 215 states that:

“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.”

- Paragraph 216 states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Havant Borough Local Plan (Core Strategy 2011 and Allocations Plan 2014)

Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of the Havant Borough

Policy CS11 (4) states that planning permission will be granted for development which:

‘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 CS16 – High Quality Design

Policy CP16 (1a) of the Core Strategy states that:

‘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:

- a) Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site’.*
- b) Integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design of a scheme wherever possible to create variety and interest;*
- c) Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;*
- d) Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible; and*
- e) The development does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking.*

Policy DM20 (Allocations Plan) - Historic Assets

Policy DM20 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.

Langstone Conservation Area Appraisal and Management Plan 2011

Mill Lane Conservation Area Appraisal and Management Plan 2017

Assessment

The following documents have been submitted with the application in relation to the assessment of the historic environment / context:

- A Heritage Statement by Wessex Archaeology (ES Appendix M2)
- A Cultural Heritage desk-based Assessment (ES Appendix M1)
- Chapter 11 of the Environmental Statement

Impact on the Mill Lane Conservation Area

• Frontage 1A – Billy Line North

This frontage is located on part of the Hayling Billy Line permissive route, which falls within the Mill Lane Conservation Area. The appraisal of the Mill Lane Conservation Area highlights its verdant and semi-rural character with views across the landscape to the harbour edge. The proposal involves replacing the existing path with a raised earth embankment, with the Billy Line upgraded to a new 3m wide shared route for pedestrians and cyclists, positioned on top of the embankment.

The existing path comprises worn hard surfacing and is enclosed by semi-formalised landscaping on either side. While the proposal would require some removal of vegetation to accommodate the wider path, replacement planting and the retention of landscaping on either side would ensure that the verdant character of this section of the conservation area is retained.

Overall, it is considered that Frontage 1A would preserve the character and appearance of this part of the Mill Lane Conservation Area, resulting in no harm to its significance.

• Frontage 2 – Billy Line South

This frontage is also located on the Hayling Billy Line cycle path further south and lies within the Mill Lane Conservation Area. The proposal includes a sheet-piled wall with raised embankments where

the defence alignment crosses existing utility infrastructure, alongside an upgraded 3m wide shared pedestrian and cycle route.

Frontage 2 is set within a more open area of the Mill Lane Conservation Area with embankments and paths already present, thus the development represents an evolution of the character of the area rather than wholesale change. On that basis, overall, it is considered that Frontage 2 would preserve the character and appearance of this section of the Mill Lane Conservation Area, resulting in no harm to its significance.

Impact on the Langstone Conservation Area

- **Frontage 3 – A3023 road to The Look Out**

This frontage lies on the east side of Langstone Road, within the Langstone Conservation Area and proposes a series of interconnected flood defence and public realm works. The works comprise a sheet-piled wall along the A3023, a raised bund within the Ship Inn car park incorporating a pedestrian ramped walkway, a new retaining wall and access steps to the Ship Inn courtyard, a glass-topped flood wall positioned in front of the Ship Inn patio, a brick-clad flood wall and a flood gate between the Ship Inn and the Ship Inn Annexe. The existing quay wall within the Ship Inn car park would be retained, with new planters and an upgraded interpretation board introduced.

The Ship Inn is a Grade II listed building whose significance derives from its architectural and historic interest, together with its prominent relationship with Chichester Harbour. The open and informal relationship between the building, its external seating areas and the harbour edge forms an important component of both the listed building's setting and the character of this part of the Langstone Conservation Area.

The proposals include an L-shaped reinforced concrete retaining wall with associated access steps and a ramp lined with granite setts, reinstatement of existing paving slabs and the introduction of black metal handrails. The courtyard retaining wall would tie into a new flood wall formed of sheet piling with a reinforced concrete cap, replacing the existing breeze-block wall. This wall would be topped with flood glass and clad on its seaward face in Ketley Staffordshire Red Class A engineering brick. The flood wall would then connect to the Ship Inn Annexe flood wall, an in-situ reinforced concrete structure with a sheet-pile toe, clad on its seaward face in Wienerberger Olde Heritage Blend brick, with a steel flood gate provided between the two sections.

The existing steps to the foreshore would be removed and replaced with a new reinforced concrete footpath with an exposed aggregate finish, providing ramped access from the Ship Inn courtyard towards the Ship Inn Annexe, again with black metal handrails.

The principal visual change arising from these works would be the transformation of the seaward-facing edge from a simple, weathered and visually recessive breeze-block boundary into a continuous, articulated and engineered frontage comprising brick cladding, glazed flood protection, railings, ramps and retaining structures. While the existing breeze block quay wall on this frontage, is not of historic origin, its minimal detailing and weathered appearance contribute to the informal, character of the harbour edge and allow an open relationship between the public realm, the Ship Inn and the water.

The proposed combination of brick-clad walls, flood glass, engineered paths, railings and access structures would introduce a more formalised character, increase material presence and visual containment, and alter the spatial and visual relationship between the listed building, its external spaces and the harbour.

Although the flood glass wall would allow continued views across the harbour, the combined effect of the new structures would introduce a more formal and engineered character, reducing the informal quality that currently contributes to the setting of the Ship Inn.

As a result, it is deemed that elements of the proposals for Frontage 3, would give rise to a low level of less than substantial harm to the significance of the Langstone Conservation Area and to the setting of the Grade II listed Ship Inn. The listed building would remain visually prominent and legible in its harbour-side context, and key views between the building and the water would be maintained, but the character of the frontage would be visibly altered. A degree of harm can be mitigated through careful control of materials, finishes and detailing, secured by condition, though the identified change in character would remain.

Frontage 4 - (The Look Out to No. 24 Langstone High Street)

This frontage lies within the Langstone Conservation Area and encompasses a series of domestic garden boundaries and small-scale harbour-edge structures, which collectively contribute to the informal, varied and incremental character of this part of the historic waterfront. Changes in wall alignment, height and materials along this frontage, reflect the gradual evolution of the settlement and form an important component of both the harbour character and the setting of nearby listed buildings, namely Green Cottage (Grade II).

The proposals for Frontage 4, comprise a sequence of reinforced concrete flood walls and flood gates, including the Watchtower Flood Wall, Flood Gate 2 (Watchtower), Green Cottage Annexe Flood Wall, Flood Gate 3 (Green Cottage Vehicle), Green Cottage Flood Wall, Flood Wall to No. 25 Langstone High Street and the Winklemarket Flood Wall. The flood walls are formed as in-situ cast stacked double L-shaped sections, with sheet piling installed at the toe. A new reinforced concrete quay wall would be constructed seaward of the existing quay wall along this frontage, supported by a buried sheet pile.

Along much of the frontage, new, matching flood walls would be constructed directly in front of existing garden walls, with cladding proposed in a combination of Ketley Staffordshire Red Class A engineering brick and flint, including Wienerberger Olde Heritage Blend brick in places and flint where flint currently exists.

Around Green Cottage, the proposed flood wall would run outside the existing green, representing a change in footpath alignment and resulting in the existing shared-use path being incorporated into the private garden area, enclosed by the flint clad new wall. An upgraded 1.5-metre-wide reinforced concrete footpath with an exposed aggregate finish and associated black metal handrails would be provided along the length of Frontage 4.

The principal heritage effect of these works would arise from the introduction of a continuous and engineered harbour-edge treatment in place of the existing irregular boundary walls. While the proposed materials comprise traditional brick and flint cladding, the combined effect of the continuous wall alignment, forward projection of the quay wall, widened engineered footpath and regularised

detailing would formalise, what is currently a more informal section of the conservation area. This would reduce the sense of incremental development and diminish the domestic character that presently contributes to the significance of this part of the harbour frontage and to the setting of Green Cottage.

In addition to its contribution to the conservation area, this frontage lies in proximity to the former Coastguard Watch Tower and associated Coastguard Cottages, which are included on the Council's Local List and together form the former coastguard station. The significance of these non-designated heritage assets derives from their historic and architectural interest as part of a late 19th-century coastguard complex, with group value arising from the survival of the watch tower and the associated cottages.

The Watch Tower occupies a prominent position immediately behind the start of the proposed flood wall, with the row of former Coastguard Cottages set further back from the harbour frontage. While the proposed flood defence works would not directly affect these buildings, the introduction of a more formalised and engineered harbour-edge treatment would alter the immediate setting in which the Watch Tower is experienced, in both short and long range views.

However, the primary significance of the former coastguard station relates to its form, historic function and group value, all of which would remain legible. The proposed works would not interrupt key relationships between the Watch Tower and the former cottages, nor would they obscure appreciation of the tower's height or landmark quality. Any resulting impact on the significance of these locally listed buildings, is therefore deemed to be less than substantial and at the lower end of the scale and does not alter the overall conclusions reached in respect of this frontage.

As a result, the proposals for Frontage 4, would give rise to less than substantial harm to the significance of the Langstone Conservation Area. The character of the harbour frontage would be altered but not lost, and the relationship between buildings, gardens and the water would remain legible, albeit in a more formalised form. In the case of Green Cottage, the realignment of the footpath would increase the separation between public movement and the listed building, which would assist in reinforcing the distinction between public and private space; however, this localised benefit does not outweigh the wider change in character arising from the introduction of a continuous engineered frontage.

The degree of harm can be mitigated through careful control of materials, detailing and workmanship, particularly in relation to brick and flint construction, secured through conditions requiring samples and sample panels. While such measures would reduce the impact, they would not remove the identified change in character.

Frontage 5 – Langstone High Street to the field north of Royal Oak

This frontage lies within the Langstone Conservation Area and encompasses one of the most historically significant and visually prominent sections of the harbour edge. The Royal Oak, a Grade II listed public house, occupies a key position at the water's edge, with its significance derived from both its architectural and historic interest and its close functional and visual relationship with the harbour. In combination with the adjacent, Grade II listed Old Mill, the Royal Oak forms part of a long-established and widely appreciated harbour-side view, which contributes strongly to the character and significance of this part of the conservation area.

The proposed flood defence works comprise a series of structures including the High Street pedestrian and vehicle flood gates (timber clad and normally fixed open), the Royal Oak flood wall (which also incorporates Nos 16 17 and 18 Langstone High Street) and flood gate, the allotment flood wall and demountable flood barrier, a vehicle flood gate at No. 21 Langstone High Street, the footpath flood wall and an earth embankment to tie into higher ground north of the Royal Oak. The existing slipway at the end of Langstone High Street would be refurbished using reinforced concrete with a sheet-pile toe.

Along the Royal Oak frontage, the proposals include a new L-shaped reinforced concrete flood wall constructed seaward of the existing quay wall and clad in stone, similar to the appearance of the existing wall, with a stretch of frontage in front of the Royal Oak, topped with flood glass to preserve outward views from the Royal Oak and adjacent residential properties. The existing historic paving slabs around the Royal Oak would be reinstated following construction works.

The existing boundary in front of the Royal Oak contributes to the informal and working character of the harbour edge and allows open views of the listed building's principal elevation from the water and from public vantage points. The edge of the wall is also used informally for seating, reinforcing the social and functional relationship between the building and the harbour. The proposed increased-height wall with a glazed upper element would significantly change how this frontage is experienced, introducing a more engineered and visually assertive boundary.

Although the use of flood glass would maintain visual permeability and retain key views across the harbour, the introduction of a taller, more substantial structure would alter the scale, solidity and material presence of the harbour edge. This would reduce the sense of openness and informality which currently characterises this location and underpins the historic relationship between the Royal Oak, the Old Mill and the water. The cumulative effect would be to formalise this section of the frontage and alter one of the most recognisable views within the Langstone Conservation Area.

As a result, the proposals would give rise to less than substantial harm to the significance of the Langstone Conservation Area and to the settings of the Grade II listed Royal Oak and Old Mill. The buildings would remain prominent and legible within their harbour-side context, and the key elements of the historic view would be retained, but the character of the frontage and the experience of the view would be appreciably altered.

The degree of harm can be mitigated to a degree, through careful control of materials, detailing and finishes, particularly in relation to the stonework and the proportion, clarity and framing of the glazed flood wall. These matters would be secured through conditions requiring samples and sample panels. While such measures would reduce the impact of the works, they would not remove the identified change in character.

Impact on listed buildings and Non-Designated Heritage Assets (NDHAs)

The proposed flood defence works would affect, directly or indirectly, the settings and associated boundary features of a number of Grade II listed buildings within the Langstone Conservation Area: The Ship Inn, Green Cottage, The Royal Oak and Nos. 16–18 Langstone Road. The significance of these assets derives from their architectural and historic interest, together with their relationship to the harbour edge and the traditionally informal, organic character of the historic waterfront.

The introduction of new flood defence walls, gates and associated structures along Frontages 3, 4 and 5 would alter elements of this setting, resulting in changes to the way in which these listed buildings are experienced in relation to the harbour frontage, as set out in the individual frontage assessments above. This change would give rise to harm which is assessed at this stage of the planning application as less than substantial, albeit at varying degrees depending on proximity, visibility and the nature of the affected boundary features. In accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, this harm will need to be afforded considerable importance and weight in the assessment of the application.

The Old Mill, a Grade II listed building of high prominence within the conservation area and the wider harbour frontage, would not be directly altered by the proposals. However, elements of Frontage 5 would be visible within its wider setting, particularly in longer-range views across the harbour. This would result in less than substantial harm to the setting of the Old Mill, assessed at the lower end of the scale.

The detailed impact on fabric, attached boundaries and immediate curtilage relationships of The Ship Inn, Green Cottage, The Royal Oak and Nos. 16–18 Langstone Road will be considered further through the associated Listed Building Consent applications, including detailed assessment of materials, junctions and construction methods. The heritage comments made on these applications should be considered alongside the comments here as part of the determination of this planning application.

Nos. 8–14 Langstone High Street (all Grade II listed) would not be directly affected by the proposals and would not be materially experienced within views of the new flood defences. It is therefore considered that the proposals would preserve the significance and settings of these assets, resulting in no harm.

In relation to non-designated heritage assets, the former Coastguard Watch Tower and associated Coastguard Cottages (together forming the former coastguard station) are located within Frontage 4 and are included on the Council's Local List. The significance of these buildings arises from their historic, architectural and group value as part of a late 19th-century coastguard complex.

As set out in the Frontage 4 assessment, the proposed flood defence works would not directly affect these buildings and would not disrupt their group value or historic legibility. While changes to the harbour-edge environment would result in some alteration to the immediate setting of the Watch Tower, the scale of this change is limited.

Consideration of Construction-Related Impacts on Listed Buildings

In addition to the completed form of the proposed flood defence works, consideration has been given to the potential effects arising from construction activities, in particular the installation of sheet piling along Frontages 3, 4 and 5, which are within close proximity to the identified listed buildings.

A number of historic buildings within Langstone are understood to have shallow or unconventional foundations, in some cases potentially bearing directly onto made ground or oyster shell deposits, and would therefore, be sensitive to ground movement and vibration. It is recognised that piling operations have the potential, if not appropriately designed and controlled, to give rise to indirect impacts on the fabric or structural integrity of such buildings.

This risk has been taken into account in the design of the flood defence scheme. The applicant has advised that the piling design has been developed on a precautionary, worst-case assumption, namely that adjacent historic properties have no conventional foundations, and that the design parameters have been set accordingly in order to avoid adverse effects on nearby listed and non-listed buildings.

The detailed construction methodology, including the precise piling technique, sequencing of works, monitoring arrangements and hours of operation, are considered to be capable of being finalised through a Construction Environmental Management Plan (CEMP) and related method statements secured by condition. Nonetheless, the fundamental design of the scheme has been informed by this from its inception and thus it is considered possible in principle to avoid impact on heritage assets due to construction methodology.

In applying the statutory duty under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has therefore been had to the desirability of preserving the listed buildings and their settings, not only in terms of the completed flood defence works but also with regard to foreseeable construction-related impacts. Subject to the implementation of appropriate construction controls, it is considered that the proposals would not give rise to unacceptable risk of harm to the fabric or structural integrity of nearby listed buildings as a result of sheet piling operations.

Benefits and planning balance

In considering the planning balance, it is acknowledged that the proposed flood defence works would give rise to less than substantial harm to the significance of the Langstone Conservation Area and to the settings of a number of Grade II listed buildings, arising from the formalisation of sections of the historic harbour frontage. In accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, this heritage harm must be afforded considerable importance and weight.

Against this harm must be weighed the significant public benefits of the proposal, including the long-term protection of designated and non-designated heritage assets themselves from repeated flood damage, and the delivery of a coherent and resilient flood defence response to recent flood events and future climate risk. It is notable that if coastal defences are not introduced and/or enhanced in this location, then all of the designated and non-designated heritage assets would end up with harm or – in a worst-case scenario – total loss due to flood events. There has already been flooding affecting Langstone and this will only be exacerbated in the future with the effects of climate change. Whilst the coastal defences themselves do lead to direct harm to those designated or non-designated heritage assets, it is considered that this could well be less eventual harm than would take place if the defences are not provided and regular flood events continue.

The form, alignment and height of the defences are driven by flood risk modelling, engineering constraints and the requirement for a continuous line of protection, which it is accepted significantly limits the scope for materially less harmful alternatives. As such, it is accepted that the ability of the applicant to moderate and/or avoid harm by altering the design is very limited.

Summary

The proposed flood defence works on frontages 3,4 and 5, would result in less than substantial harm to the significance of the Langstone Conservation Area, arising from the introduction of more formal

flood defence structures along sections of the historic harbour frontage. The proposals would also cause less than substantial harm to the setting of the Grade II listed Old Mill and to the settings and associated boundary features of other nearby Grade II listed buildings (The Ship Inn, Green Cottage, the Royal Oak and 16, 17 and 18 Langstone High Street).

In accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the identified harm to designated heritage assets must be afforded considerable importance and weight in the assessment. Where a proposal results in less than substantial harm, paragraph 215 of the National Planning Policy Framework (2024) requires that this harm be weighed against the public benefits of the proposal.

The form, alignment and height of the proposed flood defences are driven by flood modelling, engineering requirements and the need for a continuous and effective defence, significantly limiting the scope for materially less harmful alternatives.

In turn, there are public benefits of the scheme in heritage terms, specifically the long-term protection and safeguarding of heritage assets themselves from flood damage and future climate risk.

Conclusion

Having considered the proposals in detail, it is concluded that the flood defence works would result in less than substantial harm to the significance of the Langstone Conservation Area and to the setting of a number of Grade II listed buildings, arising primarily from the introduction of more formal and engineered flood defence structures along sections of the historic harbour frontage. This harm must be afforded considerable importance and weight in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraph 212 of the National Planning Policy Framework (2024).

In line with the NPPF, this identified harm needs to be weighed against the public benefits of the proposal, including the long-term protection of the conservation area, listed buildings and the wider community from repeated flood events, together with improved resilience to future climate-related flood risk. The proposals would also give rise to construction-related risks in close proximity to listed buildings; however, these risks have been identified, have informed the design approach on a precautionary worst-case basis, and are capable of being appropriately controlled through conditions and subsequent regulatory mechanisms.

It is considered that no harm would arise to the Mill Lane Conservation Area as a result of the proposed flood defence works on Frontages 1A and 2.

Should the Local Planning Authority be minded to grant planning permission, then the following conditions are recommended:

Conditions:

1. Notwithstanding the details shown on the submitted and approved drawings, no development shall commence on site until labelled samples (including manufacturer, type, finish and intended location) of all external materials, including wall cladding finishes, wall coping on frontages 3, 4 and 5, flood-defence elements and any associated materials, have been

submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out fully in accordance with the approved details.

Reason:

To ensure that the materials and finishes used preserve the character and appearance of the conservation area and the settings of nearby listed buildings, in accordance with Policies CS11 and CS16 and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. Notwithstanding the details shown on the submitted and approved drawings, no development shall commence until, in relation to Frontages 3, 4 and 5 (where new brickwork and/or flintwork is proposed), on-site sample panels measuring a minimum of 1 metre by 1 metre have been constructed and approved in writing by the Local Planning Authority.

The sample panels shall accurately demonstrate the proposed:

- brick type and brick bond;
- flint size, coursing and method of construction (where applicable);
- mortar colour, aggregate and joint profile; and
- overall surface finish and detailing.

The approved sample panels shall be retained on site for the duration of the works to which they relate, and the development shall thereafter be carried out fully in accordance with the approved details.

Reason:

To ensure that the detailed execution of brickwork and flintwork preserves the character and appearance of the conservation area and mitigates harm to the settings of nearby listed buildings, in accordance with Policies CS11 and CS16 and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3. Notwithstanding the details shown on the submitted and approved drawings, no development shall commence until details of the flood glass walls on Frontages 3 and 5, have been submitted to and approved in writing by the Local Planning Authority.

The details shall include:

- glass thickness and specification;
- framing, fixings and support systems;
- junctions between glazing and adjacent wall materials; and
- any visible trims or edge detailing.

The flood-defence glazing shall thereafter be installed and retained fully in accordance with the approved details.

Reason:

To ensure that the detailed appearance of the flood-defence glazing preserves the character and appearance of the conservation area and mitigates harm to the settings of nearby listed buildings, in accordance with Policies CS11 and CS16 and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4. No development shall commence until, in relation to all piling works proposed along Frontages 3, 4 and 5, a scheme for the protection and monitoring of nearby listed buildings has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall include details of:

- vibration and movement monitoring arrangements;
- agreed trigger thresholds; and
- contingency measures to be implemented should those thresholds be exceeded.

The approved scheme shall be implemented in full for the duration of the relevant piling works.

Reason:

To safeguard the fabric and structural integrity of nearby listed buildings during construction, in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5. Notwithstanding the details shown on the submitted and approved drawings, no development shall commence until details of all proposed planters, interpretation boards and associated wall-mounted fixtures have been submitted to and approved in writing by the Local Planning Authority.

The details shall include:

- design and dimensions;
- materials and finishes; and
- proposed locations.

The works shall thereafter be carried out fully in accordance with the approved details.

Reason:

To ensure that these elements preserve the character and appearance of the conservation area and do not detract from the settings of nearby heritage assets, in accordance with Policies CS11 and CS16 of the Local Plan and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.