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JCM/HXC/00262917/1
28 November 2023
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Dear Sir

Letter of Objection

18 Crowsport, Hamble-le-Rice, Southampton, SO31 4HG – application no. F/23/96301

Please accept this letter as a strong objection to the above application, which seeks consent for a two-storey five-bedroom dwelling.

We act for the owner of no. 22 Crowsport, which is a close neighbour to the application site.

Whilst it is noted that consent has been granted for alterations to the existing dwelling (under consent no. H/23/94973), concerns nevertheless persist in respect of the scheme. As such it is argued that the following points and concerns are raised.

Crowsport comprises a small, pre-war, estate comprising a mixture of single storey and two-storey buildings of a uniform, art deco, style.

However, the existing dwelling is single storey as are its immediate neighbours. The proposals seek to provide a two-storey dwelling on-site, which will result in a development that is out of character with the immediate area and thus harm the character and appearance of the Conservation Areas. The proposals are therefore clearly contrary to the provisions of S72 of the Listed Building Act 1990 and to policies S8 and DM12 of the adopted local plan. As such, the application should be refused.

The proposals are clearly also contrary to policy advice as set out in the Conservation Area Appraisal, which requires that first floor additions are no more than 50% of the size of the ground floor. The redevelopment proposals in effect seek to provide a new first-floor element which will be some 65% of the ground floor area. This, in itself, reinforces the concerns that are raised in respect of impact on the Conservation Area.

Concerns are also raised with regard to form of development with specific regard to the creation of a poor living environment for the residents of the proposed dwelling and with regard to potential nuisance to local residential amenities.

Detailed concerns are as follows:

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Lack of Heritage Statement

It is noted that the application is not supported by a Heritage Statement.

Reference to the LPA Local List for validation of planning applications confirms in Local List Item 10 that a heritage statement is required for any proposal is located within a conservation area.

<https://www.eastleigh.gov.uk/media/2788/validation-checklist-final-version--amended-25-june-14-pdf.pdf>

Section 6 of the Design Statement is titled Heritage Statement and acknowledges the fact that the site is located within the Hamble Conservation Area. However, it goes little further than that and provides no meaningful analysis of heritage value of the site or the area and no reference is drawn to the National Policy Planning Framework (September 2023) (NPPF).

The Heritage Statement should describe the following:

- The significance of the heritage asset and the contribution to the setting;
- The impact of the development on the significance of the heritage asset and/or its setting. Specifically, how the development will sustain or enhance the heritage asset; any harm to a heritage asset would require clear justification;
- Any necessary steps which are to be taken to minimise or negate any negative impact upon the significance of the heritage asset and/or its setting.

Reference is also drawn to para 194 of the NPPF, which requires that applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

The Design Statement ignores these requirements and cannot be considered a Heritage Statement. The inevitable conclusion that is drawn from this is that the applicant has failed to take account of fact that the proposals are located in a conservation area and that no assessment has been made in respect of potential harm that can be created to that area.

There is therefore an ongoing requirement for the applicant to submit a Heritage Statement so that it is clear that the impact on the Conservation Area is properly understood.

In the meantime, the application should be considered as invalid.

Impact on the Hamble-le- Rice conservation area

The site is located within the Hamble-le-Rice Conservation Area. There is therefore a duty under S72(1) of the Listing Building Act 1990 for any such development to preserve or enhance the character and appearance of that conservation area.

The recently adopted Eastleigh Borough Local Plan (2016-2036) (adopted April 2022) recognises the importance of the protection of heritage assets primarily through policies S8 and DM12. Relevant extracts of those policies are reproduced below with particular point highlighted in hold:

Strategic policy S8, Historic Environment

1. The Borough Council will continue to conserve and/or enhance the Boroughs heritage assets in a manner appropriate to their significance. This includes all heritage assets including listed buildings and structures, Conservation Areas as designated on the policies map, landscapes and archaeology.

This will be through the preparation of Conservation Area Appraisals and Management Plans and other strategies and in the determination of planning applications for new development (see policy DM12). This will involve:

c. restricting development likely to harm them or their settings through management of development proposals; and

d. encouraging development that enhances them, ensures their long-term management and maintenance and where possible, enables public enjoyment and the interpretation of the asset.

Policy DM12, Heritage Assets

1. Development of a heritage asset or within its setting will be permitted provided it does not harm or detract from the significance or special interest of the asset, and sustains and enhances its special character and qualities. The more important the asset, the greater the weight that should be accorded to this criterion. Permission for development which results in substantial harm to, or loss of, designated assets of the highest significance will be wholly exceptional. Development which involves the demolition or destruction of any part of other heritage assets will not be permitted unless its removal or replacement would enhance or better reveal the significance of the asset. In these circumstances, the developer will be required to record and advance understanding of the significance of any heritage assets to be lost, in a manner appropriate to their importance and the impact, and to make this evidence publicly accessible.

b. It achieves a high standard of design which respects and complements the character and qualities of the heritage asset(s);

The Hamble Conservation Area Character Appraisal (appendix A) pays particular reference to the Crowsport estate and notes that no 18 Crowsport is one of the original dwellings on the estate, thus underlining the need to take care in the consideration of any applications on-site.

Appendix A notes that there have been a number of inappropriate additions, including those at first floor level that has meant that some of the purity and simplicity associated with the Art Deco style has been eroded and lost.

Whilst it is noted that a number of local dwellings are two-stories in height, it is noted that in the part of Crowsport that there are a number of single storey dwellings to include nos. 11, 12, 19 and 20 Crowsport. The character of this part of Crowsport is therefore one of single storey buildings and, as noted from the conservation area appraisal, the provision of first floor additions erodes the character of the estate. Given the local cluster of single storey buildings it is argued that to allow the first-floor addition will therefore unacceptably harm the character and appearance of the conservation area.

Concerns previously raised by the EBC Conservation Officer are relevant and confirms that the proposed dwelling is out of character with the immediate area, as follows:

The first floor exceeds the SPD requirement iv. 'That first floor extensions do not exceed 50% of the area of the ground floor'...producing a structure of significantly greater presence, contributing further to the gradual erosion of the original character and ethos of the estate...it is critical to maintain the essential character of the original buildings.

The following photographs shows the context of the proposed dwellings within the midst of single storey buildings:

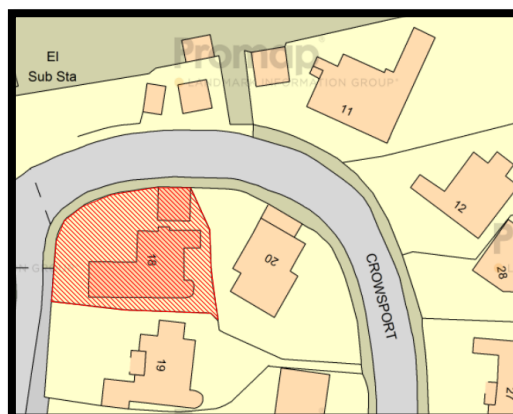




Photo 1 – 12 Crowsport



Photo 2 – 11 Crowsport



Photo 3 – 19 Crowsport

Page 12 of the character area appraisal provides specific guidance for Crowsport – which sets out a requirement to preserve the unique style of the estate and to include the following:

- i. roof forms that are flat with parapets*
- ii. walls that are of white render*
- iii. Windows that are of a simple rectangular form without glazing bars*
- iv. First floor extensions that do not exceed 50% of the area of the ground floor.*

The submitted proposed site roof plan identifies the floor area of the house at 164sq-m. However, this floor area includes a proposed single storey outshot and the existing footprint is estimated to be some 15sq-m less.

Policy requirements as set out in (iv) above makes it clear that first floor extensions should be no more than 50% of the area of the ground floor. Application of this element of the policy, on the basis of the existing footprint would mean a maximum size first floor element of some 75sqm.

However, the stated area of the first-floor element is in fact 112sq-m, which is some 50% in excess of permitted policy parameters.

The proposals therefore fail to respond to the requirements of both national policy requirements (in the form of the NPPF) and local policy advice as set out in policies S8 and DM12. The proposals specifically harm the setting of the conservation area (S8) and fail to provide a high standard of design (DM12) and should be resisted.

Overdevelopment of the plot

The application site comprises a small but prominent corner plot containing a relatively small single storey building. Its plot area is some 500sq-m and by way of comparison its neighbour, no 20 (which is another relatively small plot) is 550sq-m. The application plot is one of the smallest plots on the estate.

As such careful consideration should clearly be taken with regard to any proposals that increases the footprint, scale and massing over and above that currently on-site.

One consequence of the layout of the scheme is that bedrooms 1&2 are required to provide their only windows on southern portion of the proposed dwelling. Given the close proximity of these windows to the common boundary with no. 19 Crowsport (to its immediate south) it is clear that these windows will have a poor outlook and create a poor living environment for the residents of the proposed dwelling. Whilst the existing floorplans show one existing south facing bedroom the proposed dwelling provides for two bedrooms creating additional issues that currently exist.

Further evidence of this overdevelopment is that the applicants clearly intend to use a first-floor terraces as the primary amenity area of the dwelling. The presence of first floor living accommodation, rather than for bedrooms, points to the desire use the upper floor and terrace for the majority of the day.

The terraces are in excess of 100sq-m and significantly larger, for example, than a typical balcony. As such, there is potential nuisance for noise, which as part of an elevated area can be more problematic, particularly when relatively large gatherings take place. There is also the potential for overlooking to immediate neighbours from the terraces. The size and location of the terraces is therefore likely to result in unacceptable nuisance to immediate neighbours.

The proposals, by reason of the use of the two terraces will also result in overlooking to neighbouring properties to include that of no 22 Crowsport, thus harming their residential amenities.

Whilst the application proposals seek to echo some of the well-establish design principles of the estate the proposals clearly amount to overdevelopment of the plot. As a result, the proposals comprise a cramped form of development that will harm the character and appearance of the Hamble Conservation Area, as well as creating a poor living environment for the residents of the proposed house and harm neighbouring residential amenities.

We trust that the above comments are help in your consideration of the above application and that you will refuse the application.

Yours faithfully

Paris Smith LLP

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