

FORMER POLICE STATION, SOUTHAMPTON ROAD, LYMINGTON, HAMPSHIRE, SO41 9GH

APP/B1740/W/21/3289313

Conservation and Design Proof of Evidence



REPORT

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Prepared by: Prepared for:

RPS New Forest District Council

Jonathan Smith David Norris

Senior Director - Heritage Service Manager - Development Management

Southgate House, Southgate Street,

Appletree Court, Beaulieu Road,

Gloucester GL1 1UB Lyndhurst, Hampshire, SO43 7PA

T +44 1242 259 290 T 02380 285 797

E j.smith@rpsgroup.com E <u>David.Norris@NFDC.GOC.UK</u>

PROFESSIONAL EXPERTISE

- i. My name is Jonathan Smith and I am a Senior Director Heritage at RPS Consulting UK, having been in post for over nine years. The Heritage Team at RPS is the UK's largest heritage consultancy. Our head office is in Abingdon with a network of offices throughout the UK. We act for a wide range of private and public sector organisations, providing advice and deliverables on historic environment planning policy and practice.
- ii. I hold a first degree (Bachelor of Arts with Honours) in Archaeology and Geography from the University of Lancaster, a postgraduate degree (Master of Arts) in Buildings Archaeology from the University of York and a Postgraduate Diploma in Historic Conservation (with distinction) from Oxford Brookes University. I am a full member of both the Chartered Institute for Archaeologists and the Institute of Historic Building Conservation. I have over thirty years of professional experience in the field of planning and heritage, gained in both the public and private sectors.
- iii. In my current post I have appeared as an expert heritage witness at inquiries, hearings and examinations in public on over forty occasions, and am currently appointed on and preparing for a further two.
- iv. Before joining RPS (then CgMs) I was Heritage Team leader at Waterman Energy, Environment and Design Ltd for two years. Prior to this, I worked in local government as Heritage Service Manager at Gloucester City Council; Principal Archaeological Officer for the London Borough of Southwark; and County Archaeologist for Hertfordshire County Council. I am also currently a visiting lecturer for the postgraduate historic conservation course at Oxford Brookes University.
- v. The evidence which I have prepared and provide against this Appeal in this Built Heritage Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution the Institute of Historic Building Conservation. I confirm that the opinions expressed are my true and professional opinions.

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1 INTRODUCTION

- 1.1 This conservation and design proof of evidence has been researched and prepared by Jonathan Smith of RPS Consulting UK on behalf of New Forest District Council (NFDC). It should be noted that I did not advise the Council on the application for the refused scheme. I was invited, as a 'fresh pair of eyes', to review the refused application by NFDC. I was able to conclude that I could professionally support that refusal and argue for the rejection of the appeal. I was instructed 25th March 2022 as New Forest District Council's conservation and design expert witness.
- 1.2 The Planning Inspectorate's case reference is APP/B1740/W/22/3289313. The Appeal Site, known as former Police Station, Station Road, Lymington, was the subject of an outline planning application 21/10938 [CD1]. The application was refused by New Forest District Council 10th December 2021. Reason for refusal No.2 (RfR 2), as set out in the Decision Notice [CD51] relates to conservation and design issues.
- This proof of evidence refers to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy, including NFDC's Lymington Local Distinctiveness SPD 2011 [CD32] and Housing, Design and Density SPD 2006 [CD43]. In addition, relevant guidance, most notably the National Design Guide [CD24] and Historic England's GPA3: *The Setting of Heritage Assets* [CD42], has been consulted to inform the professional judgements made.
- 1.4 Relevant information, including the Lymington Conservation Area Appraisal [CD33] and the National Heritage List for England, has also been consulted. The conclusions reached in this proof are the result of historic research, walkover surveys of the Appeal Site and publicly accessible locations in the surrounding area, historic map studies, the review of relevant application documentation and the application of professional judgement.
- 1.5 RfR 2 states that:
 - 'The proposed development is of a scale and mass that is considered to be inappropriate and out of keeping with the area resulting in an adverse impact on the character or the surrounding area and the existing character of the adjacent Conservation Area. In these respects the proposal is considered discordant with local plan policy ENV3 of the Local Plan 2016-2036 Part One: Planning Strategy and saved policy DM1 of the Local Plan Part 2: Sites and Development Management'.
- 1.6 This conservation and design proof of evidence addresses the Appeal Scheme's impacts, as set out in RfR 2. The Scheme would change the character and appearance of the Appeal Site from one with a set-back, architecturally attractive and uncomplicated building in spacious surroundings to one which, through inappropriate scale, mass and design, dominates the Site and area with a building of non-contextual architectural appearance. The development of the Appeal Scheme would, therefore, adversely affect the setting and legibility of the adjacent Character Area D of Lymington Conservation Area in views up and down Southampton Road, the gateway into and out of this part of the Conservation Area and in terms of views between the Site and Eastern Road.
- 1.7 The single heritage asset noted in RfR 2 is the Lymington Conservation Area. However, it is a matter of common ground between the two main parties (and that of Lymington Town Council too) that the former Police Station can be identified as a non-designated heritage asset. The non-designated former Police Station's significance will be affected totally by the Appeal Scheme's development, through its complete demolition.
- 1.8 The proof also gives regard to the Old Police House, located to the immediate west of the Appeal Site and addressing Queen Elizabeth Avenue to the north. This building is contemporary with the former Police Station and is identified here as a non-designated heritage asset that holds a group

- value with the Police Station. Its significance will be affected adversely by the total loss of the Police Station and the development of the Appeal Scheme.
- This conservation and design proof of evidence concludes, firstly, that the development of the Appeal Scheme will, due to its inappropriate scale, mass and design, adversely affect the character of the wider area and, consequently, the significance of the Lymington Conservation Area and the significance of the non-designated Old Police House; and, secondly, due to the total demolition of the former Police Station, the significance of this non-designated heritage asset will be wholly harmed through its total loss and the character of the wider area adversely affected (and, consequently, the significance of the Lymington Conservation Area and the significance of the non-designated Old Police House too).
- 1.10 The significance of no other built heritage asset, designated or non-designated, will be affected by the Appeal Scheme's development.
- 1.11 I attended the case management conference for the Appeal 16th March 2022. I am aware of the main issues pertaining to the Appeal, as raised by the inspector at that conference. In terms of conservation and design issues: the effect of the Appeal Scheme's development, in terms of its scale and mass on the character and appearance of the area, with particular regard to the setting of the Lymington Conservation Area.

2 SUMMARY LEGISLATIVE CASE LAW PLANNING POLICY AND GUIDANCE FRAMEWORK

- 2.1 The current national planning policy system identifies, through the National Planning Policy Framework (NPPF) [CD21], that applicants should consider the potential impact of development upon 'heritage assets'. This term includes:
 - Designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and
 - Non-designated heritage assets, identified by Local Planning Authorities (LPAs).
- 2.2 Relevant Legislation, case law, planning policy and guidance is summarised in Appendix A of this Proof however, in short, the following has been referred to and used to guide the preparation of this conservation and design proof of evidence:
 - Planning (Listed Buildings and Conservation Areas) Act 1990;
 - Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137 [CD48];
 - National Planning Policy Framework (Ministry of Levelling Housing and Communities; July 2021) [CD21];
 - Planning Practice Guidance (DLHC) [CD22];
 - The National Design Guide (DLHC; 2021) [CD24];
 - Good Practice Advice Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England; 2015) [CD41];
 - Good Practice Advice Note 3 (GPA3): The Setting of Heritage Assets (Historic England; 2nd Edn, December 2017) [CD42];
 - New Forest District Council's Local Plan Part 1: Planning Strategy 2020 [CD27];
 - New Forest District Council's Local Plan Part 2: Sites and Development Management DPD 2014 [CD28];
 - Lymington Conservation Area Appraisal SPG (NFDC; 2002) [CD33]
 - Housing design, density and character SPD (NFDC; 2006) [CD43]; and
 - Lymington Local Distinctiveness SPD (NFDC; 2011) [CD32].

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3 APPRAISAL

Introduction

- There are no designated built heritage assets within the Appeal Site. The northern boundary of the Lymington Conservation Area's Character Area D abuts the Site's southern boundary [Fig.1]. No part of the Site is in the Conservation Area. The Site includes the non-designated heritage asset of the former Police Station with the contemporary former Police House (now the 'Old Police House') immediately to the west [Fig.1], its grounds abutting the western boundary of the Appeal Site and its main aspect to the north addressing Queen Elizabeth Avenue.
- There are a number of listed buildings and further non-designated built heritage assets (terraced houses) and a number of '*important building groups and street frontages*' as noted in Character Area 1: Town Centre of the Lymington Local Distinctiveness SPD [CD32; p.51], which includes Buckland House, to the south of the Site on Southampton Road. The significance of these assets and the identified buildings of local distinctiveness will be unaffected by the development of the Appeal Scheme. No other built heritage assets, other than those noted above, would be affected by the development of the Scheme.

Lymington Conservation Area

- 3.3 The Appeal Scheme's negative impacts to the Conservation Area's character and appearance will occur with the demolition of the former Police Station and the introduction of a new building, inappropriate in scale, massing and design, to a part of the asset's setting. The Appeal Scheme will negatively affect the character of the immediate area: the setting to the Conservation Area and the northern part of the Area, collectively the northern 'gateway' into and out of the Area along Southampton Road. The Scheme will also negatively affect the current character of the Area in relation to Eastern Road in terms of intervisibility between the Eastern Road area and the Site.
- 3.4 The Conservation Area and its setting, and the two identified non-designated heritage assets and their setting are given consideration in this proof in line with the requirements of the NPPF, local plan policy and relevant guidance.
- 3.5 The significance of Lymington Conservation Area, its character and appearance, in terms of Character Area D, is assessed in this proof of evidence in relation to the character of the Appeal Site and the surrounding area. The differing contributors to that significance are identified, as are their differing level of contribution to that significance. Following this analysis, the proof assesses the likely level of impact to be caused by the Appeal Scheme on the asset's significance.

Police Station

The significance of the non-designated former Police Station is assessed in this proof of evidence; the differing contributors to that significance (including setting) are identified, as are their differing level of contribution to that significance. It is also considered what elements of the Police Station's significance are legible, and the degree of legibility, from different parts of the area around the Site. Following this analysis, the proof assesses the likely level of impact to be caused by the Appeal Scheme on the non-designated heritage asset's significance and how the total loss of the Police Station will negatively affect the character of the surrounding area.

Old Police House

3.7 The significance of the Old Police House is considered; its group value with the former Police Station noted; the impact that the total loss of the Police Station will have on the legibility of its significance assessed; and the negative impact that the development of the Appeal Scheme would have on its significance will also be assessed.

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The Appeal Site

- 3.8 The Appeal Site currently comprises a rectangular plot of land of *c*.0.26 ha. addressing Southampton Road to the east. It is bound by Queen Elizabeth Avenue to the north, the Old Police House to the west and Buckland House to the south.
- The Appeal Site is fronted by a deep verge and pavement to Southampton Road with a low, wooden rail fence and a series of five semi-mature trees filtering but not screening views of the Police Station's main, eastern elevation [Plate 1]. The fence extends along the northern boundary addressing Queen Elizabeth Avenue. An initially similarly deep verge narrows to the west. The northern boundary is more densely planted with some larger and coniferous trees [Plate 2]. There is also relatively denser underplanting that currently offers stronger filtering of views of the Site from the north and northwest.
- 3.10 Vehicular access is to the right from Southampton Road, with a tarmac surfaced carpark fronting the main, frontage range of the Police Station. The main elevation is set back *c*.20m from Southampton Road. A footpath extends to the right (north side) of the Police Station across the grassed area (*c*.11m wide from Queen Elizabeth Avenue), which is blocked by a later close-boarded fence at the Site's western boundary. The southern, walled boundary is *c*.11m from the Police Station. A wide gate in a wall to the south of the Police Station allows access to a spacious rear car park with garaging set to a southern part of the western boundary.
- 3.11 To the north and west of the Appeal Site is a loose or coarse-grained townscape of suburban residences laid out in the mid and later twentieth century along Southampton Road and Queen Elizabeth Avenue. The individual residences are set back from the roads in relatively large, greened and well-planted plots.
- 3.12 To the east, across Southampton Road is the apartment block forming 46, 46a and 48 Southampton Road and 1 Avenue Road. This is a recent development that is of mainly two storeys with three-storey elements. It rises to a three-storey projecting 'tower' (1 Avenue Road) addressing the corner/junction of Southampton Road and Avenue Road.
- 3.13 To the south of the Appeal Site is the three-storey Buckland House addressing the junction of Southampton Road and Eastern Road. It punctuates the townscape space between the former police Station and the terrace of built heritage assets further south. To the west of Buckland House is its open, largely visually unenclosed garden and car parking put to hard surfacing. It is separated from the Site with a brick wall of *c*.1.6m height [Plate 3]. The open nature of the grounds allows clear intervisibility between the Site and Eastern Road.

Assessment of Heritage Assets and Character Areas

- 3.14 Lymington Conservation Area's character and appearance is set out in NFDC's Lymington: A Conservation Area Appraisal 2002 [CD33]. It is a matter of common ground between the main parties (and of the Town Council too) that the former Police Station is identified as a non-designated heritage asset. The Old Police House was not previously identified as a non-designated heritage asset (although was noted in the Appellant's Heritage Statement [CD14; 4.3.15, p.22]) by any party but is identified as a non-designated heritage asset in this proof.
- 3.15 The Appeal Site also falls within Character Area 1 Town Centre, as described in the Lymington Local Distinctiveness SPD [CD32; pp.29-50]. This is not a heritage asset but is relevant in this case due to the design element of reason for refusal 2 and that it forms part of the setting to Lymington Conservation Area, thereby contributing to this designated asset's significance. This is further described below.

Lymington Conservation Area – Character Area D (Character Area 1 – Town Centre)

3.16 Lymington Conservation Area was designated in 1977 with boundary amendments in 1988, 1992 and 1999. The Conservation Area Appraisal [CD33] was published in 2002. An undated Conservation Area Character Statement has also been produced. The portion of the Conservation Area closest to the Appeal Site is included in 'Character Area D – Western' [CD33; p.28 & pp.60-61].and is included in 'Character Area 1 – Town Centre' as identified and described in the Lymington Local Distinctiveness SPD [CD32; pp.29-50].

Character and Appearance

- 3.17 The principal character of Character Area D is of terraces of brick cottages and small houses. 'On Southampton Road, a terrace of almost 30 houses would have been the first example in Lymington of large-scale speculative building. [...] The later continuation of that terrace to the edge of the conservation Area was developed piecemeal over a period of 40 years' [CD33; Conservation Area Appraisal, p28]. It is noted in the Conservation Area Appraisal and the Built Heritage Statement [CD14; p.11] that terraces contribute to the character and appearance of the Conservation Area. The Heritage Statement notes that Character Area D derives its character and appearance [CD14; 4.2.6, p.12] from:
 - The presence of built form, both designated and non-designated, varying in age, style, materials and uses [...including] terraced housing on the western side of Southampton Road and small brick cottages;
 - Significance areas of housing redevelopment which results in contrasting built form (e.g. eastern and western sides of Southampton Road);
 - Residential activity being the predominant building type and function in this Area;
 - [...]
 - Activity caused by movement through the area along the road network, some of which dates to the medieval period'.

Intervisibility, Townscape and Setting

- 3.18 While the Lymington Conservation Area Appraisal [CD33] does not identify any 'views of note' or 'important views' in the locale of the Appeal Site, there are, however, clear views up and down Southampton Road into and out of the Conservation Area [Plates 4-6]. There are also clear views into and out of the Appeal Site across the grounds of Buckland House from Eastern Road [Plates 3 & 7]. Both of these were noted and discussed in the pre-application process, as referenced in the Appellant's Heritage Statement [CD14; 4.2.10, p.12]. The Heritage Statement does not note, however, 'views that are identified by local planning authorities when assessing development proposals' should merit consideration, as advised by Historic England [CD42; GPA3 The Setting of Heritage Assets, 13, p.7].
- In the views up and down Southampton Road into and out of the Conservation Area through the 'gateway' to the Area, the contrasting townscape grain within and immediately outside of the Area is clearly legible [Plates 4-6 & 8]. Namely, the grain is tight and fine within the Area, and loose and coarse just outside, including the Site.
- 3.20 To the east, the frontage, of the Site on Southampton Road there are clear sequential views of the Site as an area of coarser townscape grain and of the finer grained townscape character immediately within the Area to the south on Southampton Road [Plates 4-6 & 8]. The point of change is marked by the 'gateway' features of Buckland House and the corner 'tower' of 1 Avenue Road. The Appellant's Heritage Statement [CD14; p.14] concurs with when noting that:

'These views illustrate the importance of Buckland House, which acts as a bookend, demarking the edge of the Conservation Area from the urban surroundings to the north. The presence of Buckland House also complements and corresponds with Farringford Court [1]

Avenue Road] and together they act as large focal buildings on the northern side of the junction'.

- 3.21 Views northwards towards the Appeal Site up Southampton Road also reveal the trees fronting the Appeal Site [CD14 Heritage Statement: Plate 4, p.14] [Plates 4 & 5], particularly from on the eastern side of the Road.
- In the views to and from the Appeal Site across the grounds of Buckland House, the rear (western) and southern elevation of the Appeal Site and non-designated Police Station are clearly legible [Plate 3]. Sequential views take in the noted parts of the Site and the back-lands to the finer grained townscape of the terraced heritage assets within this part of the Conservation Area [Plate 7].

Contribution of the Police Station

- 3.23 The former Lymington Police Station (described and appraised below), is a heritage asset of 'medium' heritage significance. It is an important non-designated heritage asset of notable architectural merit. The asset and its grounds have an open and spacious character, it being located at the transition point from the fine-grained townscape of Character Area D (and Character Area 1 Town Centre) on Southampton Road to the coarser grain to the north. The Appeal Site currently does not compete with the 'gateway' between these townscape character areas formed by Buckland House and 1 Avenue Road and, as such, provides a positive element to Lymington Conservation Area's immediate setting and, consequently to its significance.
- 3.24 Due to the architectural and historic interest of the Old Police Station and the loose/coarse-grained townscape of its grounds, currently delivers an enhancement to the significance of the Conservation Area (a heritage benefit), as an element of its immediate setting.

Summary

3.25 Lymington Conservation Area is a designated heritage asset of high significance, as noted in the Heritage Statement [CD14; Table 1, p.6]. While the sequential and direct views noted above are not primary contributors to the Area's significance, which include the designated and non-designated terraces, the setting of the Conservation Area that includes the noted views holds a medium contribution to the assets' significance. In terms of the criteria set out in the Heritage Statement [CD14; Table 2, p.6], the Appeal Site and the views noted above as part of the Lymington Conservation Area 'possess attributes that make some positive contribution to the understanding and/or appreciation of the interests that embodies its significance'.

Former Lymington Police Station

3.26 Historic England carried out an initial assessment of the Police Station October 2021 against the statutory listing criteria. Their report of 29th October 2021

[https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?resourceID=5&uid=1478925] identifies that:

'Lymington Borough Police Force was formed in 1836. Hampshire County Constabulary was formed in 1839 and absorbed the Lymington Force in 1852. The former County Police Station in Lymington, an early-nineteenth-century building on Gosport Street, is listed at Grade II (NHLE entry1234808), and this station remained in use until a programme of modernisation and expansion of police stations took place in the 1950s. A new station was constructed on the Southampton Road site in 1952, with the new premises better equipped to accommodate the evolving policing practices of the mid-twentieth century, notably an increasing administrative function and the use of motor vehicles. The identity of the architect is unknown, but it has been suggested that this is the work of the county architect. The building appears on the Ordnance Survey map published in 1965, occupying essentially the same footprint as at present.

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The building is constructed of red brick, with casement windows and a hipped, pantile roof. A two-storey range is aligned north-south along Southampton Road, with a single storey range extending to the rear to form a broadly L-shaped plan. A detached garage occupies the southwestern corner of the site. The principal, east elevation is largely symmetrical, with a central doorcase to the ground floor with a casement above, flanked on either side by three bays of casement windows to each floor. No evidence of the interior was provided.

[...]

Although the building appears to be relatively unaltered, and its former use is still largely readable, this is but one of many surviving mid-twentieth-century police stations, built to a standardised formula. This is a relatively late and restrained example of the neo-Georgian style, and the building does not have any particular claims to national architectural interest through its design or use of materials. Although limited evidence of the interior has been provided, the floorplan (available as part of the planning application) does not suggest that the building demonstrates any ingenuity in its plan form.

Although there are some claims to local historic interest as an example of the development of local and national government in Lymington, this interest [in terms of the criteria for national statutory designation] is already captured through the Grade II listing of the predecessor station on Gosport Street, which is of national interest thanks to its early-C19 date and level of survival, in addition to the former use as the County Police Station'.

Historic Mapping

3.27 The Appeal Site is shown as open allotments gardens in the OS 1:10,560 mapping 1938-1942 [CD14; Heritage Statement, Appx.4]. The Police Station and the Police House are shown in place and the Appeal Site laid out by the OS 1:10,560 mapping 1957 [*ibid*] with greater detail shown in the OS 1:2,500 mapping 1964 [*ibid*]. This shows that the Appeal Site, in plan, was constructed and laid out as is currently the case. The exception is that the western boundary is now extended northwards (as a close-boarded fence) up to Queen Elizabeth Avenue to cut off the path between the Police Station and the Police House to the west. This is shown to have happened in mapping by the OS 1:10,000 map 2021.

Description of the Building

- 3.28 The former Police Station's main, frontage range is a Neo-Georgian two-storey, brick-built building with a hipped pan-tile roof and parapet [Plate 1]. The main range exhibits unfussy, Classical symmetrical proportions in its façade with regular fenestration set out in Classical ratios. This precisely delivered balance gives the façade a simple, unflustered and calming symmetry. The ground-floor windows, set in projecting outer frames, are four-over-six lights with the upper windows, set in identical projecting outer frames, four-over-six-over-four lights. The central, original main double door [Plate 9] is set within a sandstone square-headed, shallow portico (with horizontal fluting to imply cornicing) with its flanks formed of stylised, fluted columns formed as one piece with the portico. The fluting sweeps to the side at the head of each 'column' to imply capitals.
- 3.29 The building is:

'of notable architectural merit which adds positively to the Site and its context. Its narrow frontage form [in depth] is a well-proportioned two-storey height with increased first-floor height and parapet roof detail. [...] The current building maintains a more open character to the front with space around and behind the building. The verdant edges of the Site are quite important and assist with the positive response to the street [Southampton Road]' [CDXX; NFDC Conservation representation 10th March 2021, p.1]

Such an appraisal and conclusion were set out during the pre-application process. The open character to the frontage range extends to the south of the building and around to the southern portion of the rear space. Single-storey, flat-roofed ranges are set to the rear of the main range with a substantial range extending to the west at the northern end of the building [Plate 10]. This range includes the custody suite and exercise area.

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3.30 The Appellant's Heritage Statement [CD14; 4.3.11, p.21] notes that:

'Architecturally the building is of some interest as it is an example of a purpose-built midcentury police station. It is a late example of the inter-war 1914-1950 purpose-built midcentury police station. [...] From a review of modern plans, it appears that the interior of the police station has received relatively little alteration.

Similar [Neo-Georgian] examples of varying sizes can be found across the country including Worcester Station, Worcestershire; Gerrards Cross, Buckinghamshire; Salisbury Station, Wiltshire; Southam Police Station, Warwickshire; the former Madeira Road Police Station, Bournemouth; and Dover Station, Kent'.

These examples are taken from Ecus' 2015 *Police Stations of England 1850-1995* [as referenced in the Appellant's Heritage Statement].

Setting of the Police Station

- 3.31 The immediate setting of the Police Station is notably spacious and open, particularly to the east, south and southwest. This gives a strong functional and ownership relationship with the building and aids the asset's legibility as a former police station. The immediate setting includes the Old Police House which also has a strong functional and recent former ownership association with the Police Station. The Old Police House provides strong group value to the significance of the Police Station.
- 3.32 The wider setting includes the immediate townscape around the Appeal Site. This includes the open-grained suburban residential areas to the west, north and east [Plate 11]; the finer grained townscape of the entrance way and into the northern part of Character Area D, Lymington Conservation Area along Southampton Road (and Character Area 1 Town Centre) [Plate 4]; and the finer grained back-lands within the Conservation Area around Eastern Road [Plate 12]. There is strong legibility of the asset's significance in views from Southampton Road and across the grounds to Buckland House from Eastern Road. Sequential views of the Appeal Site with the northern parts of the Conservation Area on Southampton Road see the Site legible as a transitional area between the fine and coarser-grained townscape areas with the 'gateway' between the two marked by the scale of Buckland House and the corner tower to 1, Avenue Road.

Summary

- 3.33 The non-designated Police Station's significance is primarily delivered by its near unaltered form as a well-executed example of a later Neo-Georgian site-type. Its immediate setting also strongly contributes to its significance as does the group value with the Old Police House. The wider setting, as described above, delivers a notable contribution to the asset.
- 3.34 The former Lymington Police Station is a non-designated heritage asset of notable historic and architectural interest. In line with the criteria set out in the Heritage Statement [CD14; Table 1, p.6], the former Lymington Police Station is a heritage asset of medium heritage significance, that is, its heritage value is at the top end of the spectrum for non-designated heritage assets.

Old Police House

- 3.35 The Old Police House is set to the west of the former Police Station, addressing Queen Elizabeth Avenue [Fig.1]. It was built at the same time as the Police Station (as set out above) as part of the same complex. It became a separate residential unit by 2021 when the path to the Police Station was blocked off with a close-boarded fence and the House was extended to the rear with a two-storey hipped wing and a single-storey, flat-roofed extension [the Heritage Statement notes that this was in 2005; CD14; 3.3.15, p.22]. The frontage has been remodelled and set to gravel to allow for on-site car parking. The rear is a planted garden and potential views to the south are largely screened by planting that includes semi-mature trees.
- 3.36 The Old Police House's main façade is to the north, addressing Queen Elizabeth Avenue and formed in the same brick stock used in the Police Station [Plate 13]. It is of three over-sized bays,

thereby lacking the precise Classical ratios executed in the main façade of the Police Station. It has a steep, hipped pan-tile roof (as seen on the Police Station) with two symmetrically placed, hipped dormers. The fenestration is symmetrically laid out with a central door. The doorway is formed in a sandstone projecting portico with a square-headed cornice over and flanked by implied pilasters, each on a plinth.

Summary

- 3.37 The Old Police House is a non-designated heritage asset of some historic and architectural interest. Its significance is delivered by its unaltered main façade and its history. Its immediate setting, formed of the Appeal Site, also strongly contributes to its significance as does the group value with the former Police Station. The wider setting delivers a minimal contribution to the asset's significance.
- 3.38 The former Old Police House is a non-designated heritage asset of demonstrably limited heritage interest. In line with the criteria set out in the Heritage Statement [CD14; Table 1, p.6], the former Old Police House is a heritage asset of low significance.

Appeal Scheme Impacts to Heritage Assets' Significance

Appeal Scheme

- 3.39 The refused application was seeking the outline planning permission for the:

 'demolition of existing building and redevelopment of the site to form 32no, retirement apartments including communal facilities, access, car parking and landscaping'.
- 3.40 A vehicular access is proposed from Queen Elizabeth Avenue thereby creating a new vehicular and pedestrian access. It is proposed to position this against the western boundary close to the Old Police House. The proposed building is of four storeys, the upper dormered, with attached three and four-storey elements to the rear (west).

Impacts

- 3.41 The Appeal Scheme will demolish all existing buildings and introduce new built form to the Appeal Site. The proposed Scheme will significantly increase the built area across the Appeal Site in plan and double the height in storeys to the built form on the Site. The footprint of the Police Station is c.330m² (with the garage block's footprint at c.79m²) and the Appeal Scheme proposes a footprint of c.845m², approaching three times the footprint of the Police Station.
- 3.42 The demolition will have a complete impact on the significance of the non-designated heritage asset of medium, heritage significance (the former Police Station) through its complete demolition and a minor impact on the significance of the non-designated Old Police House.
- 3.43 The Appeal Scheme will also have a significant impact on the character and appearance of the Lymington Conservation Area Character Area D, in terms of the Appeal Site forming a part of the Area's setting. This will be through the removal of the unfussy Classical form of the Police Station from this part of the loose-grained townscape area and introducing a building of complex articulation, bulky massing and profoundly increased scale that, by 'filling out' the Appeal Site's current open spaces, erodes the Site's loose-grained townscape.

Lymington Conservation Area

3.44 The portion of Lymington Conservation Area closest to the Appeal Site is included in the Character Area D – Western [CD33] and is included in Character Area 1 – Town Centre as identified and described in the Lymington Local Distinctiveness SPD [CD32]. The principal character of Character Area D is of terraces of brick cottages and small houses. The Appeal Site, which abuts the boundary to the Conservation Area, forms a part of the asset's immediate setting.

- There are two aspects to how the Appeal Site and the current buildings within it have a positive impact on the setting and, therefore, the character and appearance of the Conservation Area. Firstly, in views up and down Southampton Road into and out of the Conservation Area through the 'gateway' to the Area, the contrasting townscape grain within and immediately outside of the Area is clearly legible. Namely, the grain is tight and fine within the Area and loose and coarse just outside, and the latter includes the Site. To the immediate east of the Site on Southampton Road there are clear sequential views of the Site as an area of coarser townscape grain and of the finer grained townscape immediately within the Area to the south on Southampton Road [Plates 4, 8 & 11]. The point of change is marked by the 'gateway' features of Buckland House and the corner 'tower' of 1 Avenue Road.
- 3.46 Secondly, In the views to and from the Appeal Site across the grounds of Buckland House, the rear (western) and southern elevation of the Appeal Site and non-designated Police Station are clearly legible [Plates 7 & 12]. Sequential views take in the noted parts of the Site within a transitional and coarser-grained townscape and the back-lands to the finer grained townscape of the terraced heritage assets within this part of the Conservation Area [Plate 12].
- 3.47 Development of the Appeal Scheme will erode the current nature of a coarser-grained townscape in the Appeal Site between the fine-grained townscape of the northern part of the Character Area D of the Conservation Area to the suburban loose-grained townscape further to the north and northwest in the setting to the Conservation Area. The current 'gateway' effect of Buckland House with the 'tower' of 1 Avenue Road will be eroded between the two townscape density areas (between the Conservation Area and its setting) by the introduction of the proposed building of a complex articulation, bulky massing and profoundly increased scale.
- 3.48 It is noted that the medium heritage significance of the Police Station and the loose/coarse-grained townscape character of its grounds (the Appeal Site), as part of the Conservation Area's immediate setting, currently deliver an enhancement (a heritage benefit) to the significance of the Area. With the complete loss of the asset and the current townscape character, the developed Appeal Site would deliver no heritage benefit to the significance of the Conservation Area.
- The Appeal Scheme will cause a less than substantial level of harm to the high significance (character and appearance) of Lymington Conservation Area. This will specifically be a moderate level of harm within the spectrum of less than substantial harm. This harm has not been identified by the Appellant and, as such, the required clear and convincing justification of this harm has not been made. Great weight is also to be given to the conservation of such designated assets. This level of harm to the high significance of this designated heritage asset would warrant the dismissal of the Appeal.

Former Lymington Police Station

- 3.50 The former Lymington Police Station is a non-designated heritage asset of medium heritage value due to its heritage interest and notable architectural interest. The asset's significance is primarily delivered by its near unaltered form as a well-executed example of a later Neo-Georgian site-type. Its immediate setting also strongly contributes to its significance as does the group value with the Old Police House. The asset's setting, of a coarse-grained townscape character contrasting with the finer grain to the immediate south, delivers a notable contribution to the asset.
- 3.51 It is clear that the Police Station is not of architectural and historic special interest since it does not meet the criteria for statutory designation. However, it does hold architectural and historic interest.
- 3.52 The Appeal Scheme includes the complete demolition of the former Police Station. Its significance, its architectural and historic interest, will be entirely lost. The Heritage Statement [CD14; 6.1.7, p.28] suggests that this total loss can, to an extent, be mitigated by recording the building in advance of demolition ('preservation by record'). While it would be entirely appropriate to record this non-designated heritage asset of medium heritage significance prior to its complete destruction, should that come to pass, the NPPF is very clear [CD21; 205, p.58] that 'the ability to

record evidence of our past should not be a factor in deciding whether such loss should be permitted'.

3.53 It is clear that the development of the Appeal Scheme would cause a complete harm to the asset's medium level of heritage significance. As required by paragraph 203 of the NPPF [CD21] the inspector would be required to weigh this complete level of harm with the asset's medium heritage significance. This level of harm and would warrant the dismissal of the Appeal. It is already noted above how the loss of the asset and its proposed replacement would have a negative impact on the significance of the Lymington Conservation Area.

Old Police House

- 3.54 The Old Police House is a non-designated heritage asset of low heritage significance. The complete loss of the former Police Station would have a profound negative impact on the asset's legibility as of ancillary use to the contemporary former Police Station.
- 3.55 The development of the Appeal Scheme would cause a moderate level of harm to the asset's low significance. As required by paragraph 203 of the NPPF [CD21] the inspector would be required to weigh this moderate level of harm with the asset's low heritage significance.

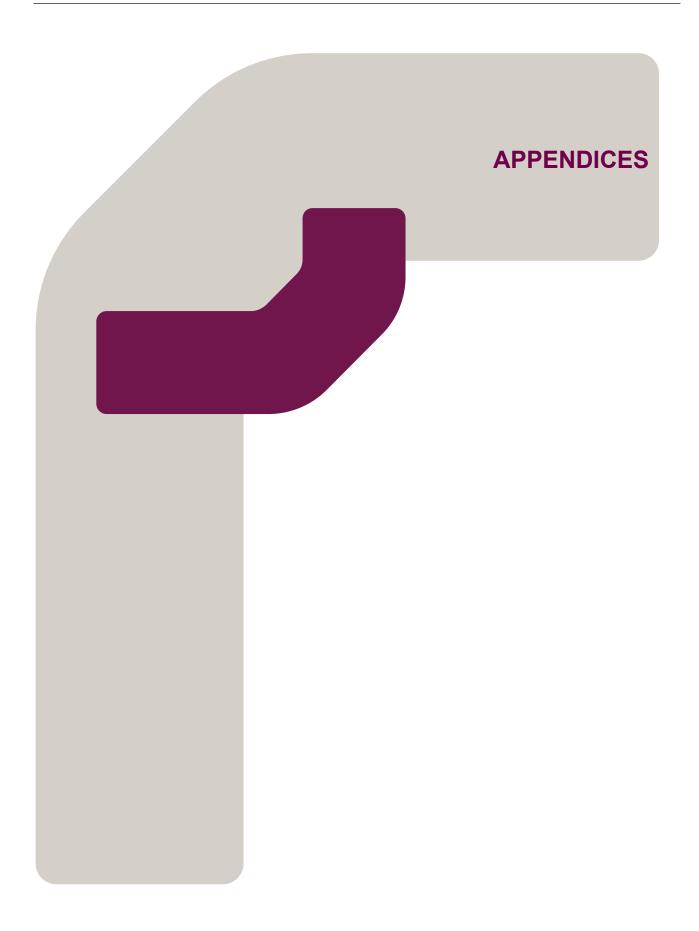
Summary and Local Plan Policy Context

- 3.56 In terms of saved Policy DM1: *Heritage and Conservation*, the Appeal Scheme is contrary to the Local Plan Part 2, in that it:
 - Fails to conserve and enhance the historic environment and heritage assets, and does not have a particular regard to local character [a];
 - The identified heritage assets are not protected in proportion to their significance [Conservation Area: high and the Police Station: medium]; and
 - The Appeal Scheme does not conserve or enhance the significance of the identified heritage assets.
- 3.57 Additionally, under (b) bullet point 5 of Policy DM1, the inspector is directed to take account of the following in making her decision: 'whether the public benefits of a proposal outweigh any harm caused to the heritage asset'. It is not the case that the level of harm (total) to the significance of the former Police Station is outweighed by the Appeal Scheme's public benefits (as set out Mr Gilfillan's planning proof). The level of harm, total through the full removal of this asset, has not been avoided and the planning proof of Mr Gilfillan concludes that the public benefits of the Appeal Scheme have not been clearly demonstrated to have outweighed the total level (therefore at the top end of the spectrum) of harm to the former Police Station's significance.
- In terms of ENV3 Design Quality and Local Distinctiveness, the Appeal Scheme does not achieve high-quality design that contributes positively the Appeal Site and area's local distinctiveness. The Scheme is not sympathetic to the coarse/loose-grained nature of the townscape area of the Appeal Site and of that to the north and west (part of the setting to Lymington Conservation Area). It is also not sympathetic to the finer-grained townscape character of the area to the south (including the Lymington Conservation Area). It is not sympathetic to the transitional nature of the Site and is unsympathetic to the 'gateway' effect between these character areas formed by Buckland House and 1 Avenue Road [ENV3 i].
- The Appeal Scheme would deliver profound visual intrusion and overbearing impact due to the increased bulk, scale and mass of the Scheme compared to the current sympathetic situation [ENV3 ii]. The Scheme will not enhance the sense of place and ensure the provision of good architecture for the existing townscape characters in the Appeal Site and area [ENV3 vii].

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4 CONCLUSION

- 4.1 This conservation and design proof of evidence has been prepared in order to assess the impacts of the Appeal Scheme's development on the townscape character across and around the Appeal Site and the impacts on built heritage assets arising from the proposed development of the Appeal Site. This proof of evidence meets the requirements of the NPPF and local planning policy. It provides sufficient, proportionate information and assessment to identify the potential impacts arising from the development of the Appeal Site on the historic built environment and, consequently, to allow the inspector to make a suitably informed decision.
- 4.2 This proof concludes that the proposed development of the Appeal Site (as part of the asset's setting) will result in a less than substantial level of harm (moderate within that spectrum) to the high significance of the Lymington Conservation Area; a complete, total level of harm to the moderate significance of the non-designated former Police Station; and a moderate level of harm to the low significance of the non-designated Old Police House. The Appeal Scheme will have an impact on no other heritage assets' significance.
- 4.3 It is also noted that the medium heritage significance of the former Police Station and the loose/coarse-grained townscape character of its grounds (the Appeal Site), as part of Lymington Conservation Area's setting, currently deliver an enhancement (a heritage benefit) to the significance of the Conservation Area. With the complete loss of the Police Station and the current townscape character, the developed Appeal Site would deliver no heritage benefit to the significance of the Conservation Area. In fact, as set out above, the Scheme delivers a quantum of harm to the character and appearance of the Conservation Area.
- 4.4 There are no statutory duties placed on the inspector in this case in relation to conservation and design. The Appeal Site includes no listed building, is not within the setting of any listed building and no part of the Site forms land within a conservation area.
- 4.5 The NPPF states in paragraph 202 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'. Great weight should be given by the inspector to any harm caused by the Appeal Scheme to Lymington Conservation Area's significance, it is my conclusion that this level of harm is moderate within the spectrum of less than substantial harm.
- 4.6 The NPPF states in paragraph 203 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 the application 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'. In this case, the inspector is directed to weigh the complete harm to the Police Station with its medium level of significance and to weigh the low harm to the Old Police House with its low significance.
- 4.7 It is my view that the Appeal Scheme, in terms of conservation and design issues is contrary to New Forest District Council's Local Plan Policy DM1 [set out above from 3.56] and Local Plan Policy ENV3 [set out above from 3.58].
- 4.8 The planning proof provided by Mr Gilfillan considers the Appeal Scheme's public benefits and their balance with any harms to the historic environment in the context of paragraph 202 of the NPPF and Local Plan Policy DM1 (b) bullet point 5.
- 4.9 The Appeal Scheme will cause significant harm (moderate within the spectrum of less than substantial harm) to the high significance of Lymington Conservation Area and complete harm to the medium significance of the non-designated former Lymington Police Station. Consequently, in regard to conservation and design issues for this case, it is my professional opinion that these levels of harm are sufficient to place restriction on the granting of permission.



APPENDIX A

Legislation Case Law Planning Policy and Guidance

- 5.1 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990 (hereafter 'the Act').
- The relevant legislation in this case extends from sections 16 and 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting. This statutory duty is not engaged in this case since the Appeal Site and the nature of the Appeal Scheme does not affect the setting of any built heritage asset. Similarly, section 72 is not engaged in this case since no part of the Site forms land within a conservation area.
- 5.3 The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137 [CD6/1].
- The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- The NPPF [CD11.01] is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 5.6 It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.
- 5.7 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance'.
- For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 5.9 Under *Considering potential impacts* the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 5.10 Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is

- necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.
- 5.11 Paragraph 197 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

National Guidance

Planning Practice Guidance (DCLG)

- 5.12 The Planning Practice Guidance (PPG) [CD11.02] has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 5.13 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed. The guidance also advises that where harm is identified, either substantial or less than substantial, to the significance of a heritage asset, that 'within each category of harm [...], the extent of the harm may vary and should be clearly articulated' [18a-018].

Conservation Principles, Policies and Guidance (English Heritage, April 2008)

- 5.14 Conservation Principles [CD11.09] outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England's own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable.
- 5.15 The guidance describes a range of heritage values which enables the significance of assets to be established systematically, with the four main heritage values being: evidential value; historical value; aesthetic value; and communal value.

Overview: Historic Environment Good Practice Advice in Planning

5.16 The three Good Practice Advice in Planning Notes (GPAs) were published by Historic England. *GPA1: The Historic Environment in Local Plans* provides guidance to local planning authorities to help them make well informed and effective local plans. *GPA2: Managing Significance in Decision-Making* includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. *GPA 3: The Setting of Heritage Assets* replaces guidance published in 2011. The relevant guidance in this case is GPA2 and GPA3.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 5.17 This document [CD11.10] provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:
 - 1. Understand the significance of the affected assets;
 - 2. Understand the impact of the proposal on that significance;
 - 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
 - 4. Look for opportunities to better reveal or enhance significance;
 - 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
 - 6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

- As with the NPPF the document [CD11.11] defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 5.19 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 5.20 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 5.21 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

- 5.22 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
 - 1. Identify which heritage assets and their settings are affected;
 - 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 - 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 - 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 - 5. Make and document the decision and monitor outcomes.

Local Planning Policy

- 5.23 The Local Plan policies noted in Reason for Refusal 2 [CD51] are Policy DM1: *Heritage and Conservation* and ENV3 *Design Quality and Local Distinctiveness*.
- 5.24 Policy DM1 states that:
 - a) Development proposals and other initiatives should conserve and seek to enhance the historic environment and heritage assets, with particular regard to local character, setting, management and the historic significance and context of heritage assets.

In particular:

All heritage assets will be protected in proportion to their significance. The more significant the heritage asset, the greater the presumption in favour of its conservation;

Development proposals should conserve or enhance the significance, character and appearance of heritage assets;

[...]; and

[...].

b) In assessing the impact of a proposal on any heritage asset, account will be taken of:

The impact of the proposal on the heritage asset and its significance, with regard to the nature of the significance of the heritage value and the value that it holds for this and future generations;

The impact of the proposal on the setting of the heritage asset; and

The impact of the proposal on public access to, and the enjoyment and appreciation of the heritage asset;

If there would be harm to the heritage asset, account will be taken of:

[...]; and

Whether the public benefits of a proposal outweigh any harm caused to the heritage asset. Exceptions to the principle of safeguarding heritage assets from inappropriate development will only be considered where substantial harm is avoided and where the public benefits of a proposed development can be clearly demonstrated to outweigh the level of harm to the significance of the heritage asset.

c) [...].

d) [...].

5.25 Policy ENV3 states that:

All development should achieve high quality design that contributes positively to local distinctiveness, quality of life and enhances the character and identity of the locality by creating buildings, streets, places and spaces that are:

Functional: well connected to surrounding uses, and logically laid out so that different elements work well together in a manner that is safe to access, easy to navigate, convenient to use and makes effective use of both developed land and open spaces;

Appropriate: sympathetic to its environment and context, respecting and enhancing local distinctiveness, character and identity; and

Attractive: visually appealing and enjoyable to be in.

New development will be required to:

- i. Create buildings, streets and spaces which are sympathetic to the environment and their context in terms of layout, landscape, scale, height, appearance and density and in relationship to adjoining buildings, spaces and landscape features;
- ii. Avoid unacceptable effects by reason of visual intrusion or overbearing impact, overlooking, shading, noise and light pollution or other adverse impacts on local character or residential amenity;
- iii. Create buildings, streets and spaces which are accessible to those with disabilities or of reduced mobility, that are safe and easy to navigate, and that minimise opportunities for antisocial and criminal behaviour or other public threats;
- iv. Integrate sufficient car and cycle parking spaces so that realistic needs are met in a manner that is not prejudicial to the character and quality of the street, highway safety, emergency or service access or to pedestrian convenience and comfort;
- v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective, such as greywater recycling and natural heating and cooling, and the use of Sustainable Drainage Systems (SuDS);
- vi. Provide appropriately designed green spaces including sufficient planting, and where applicable: provision for play, sports and natural green spaces for recreational mitigation; and
- vii. Enhance the sense of place by ensuring that buildings, streets and spaces are attractive to look at through good architecture, landscape and street design.

PLATES



Plate 1: Main elevation, eastern, of Lymington Police Station from Southampton Road



Plate 2: Northern boundary to the Appeal Site on Queen Elizabeth Avenue



Plate 3: Rear elevation of the police Station from Eastern Road across the grounds of Buckland House



Plate 4: View south into the Conservation Area from outside of the Police Station on Southampton Road



Plate 5: View northwards out of the Conservation Area showing the trees fronting the Appeal Site



Plate 6: View north out of the Conservation Area showing the trees fronting the Appeal Site



Plate 7: View southwest from the southern part of the front of the Appeal Site across the grounds of Buckland House towards Eastern Road



Plate 8: View south on Southampton Road from between Queen Elizabeth Avenue and Kings Road showing the open, greened and loose-grained townscape in the foreground (with the trees fronting the Appeal Site in the centre right with the shallow, hipped roofs of Buckland House behind), and the finer-grained townscape within the Conservation Area in the distance



Plate 9: The Police Station's front doorway



Plate 10: View of rear of the Police Station from the grounds of Buckland House



Plate 11: View northwards up Southampton Road from the police Station's front door showing the loose-grained, open and greened character of the townscape of the Appeal Site and to the north



Plate 12: View east along Eastern Road showing finer-grained townscape character to the right and looser-grained townscape character to the left with Buckland House centre left



Plate 13: Main, north elevation of the Old Police House on Queen Elizabeth Avenue

FIGURES

