

Planning Statement

**2 Amery Street, Alton GU34
1HN**

Prepared For
Envisage Dental UK Ltd

**10170
May 2021**

Including Heritage Assessment



bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of our clients Envisage Dental UK Ltd in support of a planning application for the Change of Use of No.2 Amery Street, Alton. The application seeks approval for the principle of the change of use only, no alterations to the property are included in this submission.

BACKGROUND

1.2 The premises have been occupied as a dental practice for many years. The current Dental Practice has now relocated its operations to Kingsclere Dental Practice, 60 Normandy Street, Alton. This building is better suited with its larger rooms and layout to provide dental services for a modern day practice.

1.3 The Amery Street premises is a Grade II listed building. It has a modest footprint, low ceilings with beams. There are a number of floor level changes within the building, resulting in steps down and up into internal spaces. The first-floor circulation space is tight and coupled with the relatively narrow and turning staircase it is not easy to negotiate the areas.











2 SITE AND SURROUNDINGS

- 2.1 The property is Grade II listed and is listed with the adjoining property No.3 Amery Street. The listing details state:

AMERY STREET 1. 5236 - No 2 13.3.51. No 3 SU 7139 2/4 II 2. Possibly of C16 origin. Altered. Under single tiled roof. 2 storeys. No 2: 3 bays. Colour-washed brick. Ground floor with central door flanked by 2 wide casement windows. Broad band at 1st floor level. 1st floor with central narrow casement window flanked by 2 wide casements. No 3: 2 irregular bays. Timber-framed with some herringbone brickwork. Ground floor with door and wide casement window on right. 1st floor with one narrow and one wide casement.

- 2.2 The property benefits from a rear yard area with an enclosed long garden area extending westwards. To the south No.1 is a residential property which has rear garden amenity space. There is a detached building, addressed as No.5a, the use of this is unknown. This building is located at the rear of No.1 Amery Street. No. 3 Amery Street is a residential property, again enjoying a long rear garden. No. 3 has an outbuilding which abuts the garden boundary of No. 2 Amery Street, which serves to enclose the gardens from one another and provide further privacy.
- 2.3 The southern boundary of No.2 also abuts the rear service and car parking area of the commercial premises Nos 11 – 17 Lenten Street. The boundary wall has fallen into the garden area of No. 2. The garden is overgrown and in need of some care but has the potential to become a delightful private garden space for the new chapter of the property as a residential dwelling once more.
- 2.4 There is no on- site car parking for the property. There is a public car park (Vicarage Hill) on the opposite side of the road with pedestrian access through from Amery Street providing readily available parking for local residents.
- 2.5 The application site is located within the town centre of Alton, as defined in policy documents, but is not within either a primary or secondary shopping area. The property is located within the Alton Conservation Area.



ALTON CONSERVATION AREA

- 2.6 The Conservation Area was originally designated in 1970 and further extended in 1982. The character of the Conservation Area can be understood from five key factors; the surviving medieval street pattern, the many historic buildings of different ages and local vernacular details, generally all in their original narrow plots, the Market Square and buildings forming the streets and alleys to it, the focal point of the Church in the Townscape and the surviving brick pavements.
- 2.7 The key feature of the Conservation Area is the wide High Street and the narrow streets and alleys that lead off from it. Most of these follow the earlier medieval pattern.

PLANNING HISTORY

- 2.8 There is no relevant planning history for the property. We are advised that a dental practice has operated from the premises for some forty years plus.

PROPOSAL

- 2.9 The application seeks the change of use of the listed property from Class E (formerly Class D1 clinic) to Class C3 (dwelling house).



3 POLICY CONSIDERATIONS

- 3.1 The relevant Development Plan documents are the East Hampshire District Local Plan Joint Core Strategy (2014), the East Hampshire District Local Plan Second Review (2006) and the Alton Neighbourhood Plan (2016).
- 3.2 The Draft Version of the Local Plan (2017 – 2036) was published under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for public consultation, ending in March 2019. Based on the current early stage of preparation, the Draft Local Plan policies are currently afforded no weight.
- 3.3 The National Planning Policy Guidance 2019, the Town Design Statement and other supplementary planning guidance are all material considerations.

PRINCIPLE OF DEVELOPMENT

- 3.4 The Core Strategy supports sustainable development (Policy CP1). Policy CP2 sets out the development strategy for the District and informs that development will be directed to the most sustainable and accessible locations.
- 3.5 The site is located within the Alton Town Centre Area, but not within either the primary or secondary areas as defined in the Plan document and Proposals Map. Policy CP10 sets out the spatial strategy for housing, with new development and re-use of land being supported for residential use, subject to relevant policy considerations. Further to this, Policy H3 of the East Hants Second Review (2006) also supports the re-use of under-utilised land and buildings for residential.

ALTON NEIGHBOURHOOD PLAN

- 3.6 The Plan seeks to ensure that the character of the town is preserved and that appropriate standards of parking and other residential amenity is met.

RETENTION OF SOCIAL AND COMMUNITY FACILITIES

- 3.7 The Council seeks to retain social infrastructure and Policy CP16 provides for this. The change of use, or loss of such facilities will only be permitted if it can be proven that the facility is no longer required and alternative facilities are easily accessible for the



community they are intended to serve. The Policy also requires that the use is no longer viable and marketing information is available.

- 3.8 A Dental Practice is included within the Table of Facilities and Services under Public Services heading for examples of such uses to be retained.
- 3.9 The Use Class Order was amended September 2020. Class D (clinic - dental practice) was revoked and is now split and replaced by new Classes E and F. Class D1 non-residential institutions including clinics is now included in Class E(e-f) and F1. Class E(e) Medical or Health Services.
- 3.10 Firstly, the dental practice has not ceased but has relocated to premises on Normandy Street within the town. This dental practice is easily accessible to the community it serves and better situated to encourage new clients from passing footfall. The new premises are in close proximity to other services and community facilities. The premises can be accessed on foot, by rail, bus or car. The rail station is over the road and there is public car parking in the church car park opposite. The premises are situated amidst an established residential area. A new MaCarthy and Stone retirement development is being built in the immediate vicinity.
- 3.11 The second criteria of Policy CP16 sets out a requirement for the premises to be rigorously marketed. It is usually suggested that a 12 month period is demonstrated to have been actively marketed. However, the last year adapting and reassessing business ventures through the COVID pandemic has impacted massively upon town centre uses. Many businesses have had to take tough decisions in closing or contracting the scale of operations. Businesses have not had the luxury of the usual time periods to remain trading and market them simultaneously.
- 3.12 To support the proposals, a Marketing Statement has been provided by Hamptons Estate Agents of Alton. They have been instructed by the owners to market and sell the property.



The Statement reads :

Property Market in Alton

- 3.13 • *The market for properties in Alton is strong with firm demand from potential purchasers looking to secure a suitable home from both within and from outside of the immediate area. A number of potential purchasers are attracted to the town given the ease of accessibility to the surrounding regional centres and the links to London and the south coast. The surrounding countryside is also of significant appeal to purchasers from larger urban areas.*

Role of the High Street

- 3.14 • *The High Street is the 'hub' of the town and it is important that there are a variety of facilities available to provide suitable facilities and amenities for the population of the local area and to attract residents from the surrounding areas. It is important for health/dental facilities to be readily accessible. However, whilst it is important for these facilities to be 'local', I would suggest that the patients of these facilities tend to wish to visit those facilities that provide a broad range of services as possible and which are not limited by the size of their premises.*

Amery Street

- 3.15 • *Amery Street is a one-way street primarily of terraced and semi-detached residential/domestic properties and the Community Centre. There was a restaurant that occupied a site further along the Street but has been closed for a number of years. I suspect that the failure of this business was due to the lack of footfall on Amery Street. Amery Street is perceived to be a primarily residential area. As such, I would not suggest that it was a target area for non-domestic businesses. We oversaw the sale of the adjoining property (Edmund Spencer House, No. 1 Amery Street in 2019).*

2 Amery Street

- 3.16 • *A number of potential purchasers were attracted to Edmund Spencer House by the character and history of the building. No.2 Amery Street is also a characterful building. The layout of the building is not suitable though for a number of non-domestic / business*



requirements where there is typically a need for open plan spaces and the need for maximum flexibility to change/alter a layout.

Further remarks

- 3.17 • *Given 2 Amery Street is Grade II Listed and the location and layout of the building I believe that it is significantly more likely to appeal to a purchaser for residential instead of commercial reasons. The layout and size of the rooms are limited and unlikely to meet the needs of a commercial / non-domestic occupier. The market and therefore demand for properties of character within the town is stronger for residential rather than commercial purposes.*
- 3.18 • *We are currently undertaking a full marketing campaign for 2 Amery Street. The property is advertised upon each of our websites and also fully within our network of offices to our register of potential purchasers. We have received enquiries from potential purchasers who wish to purchase for the purpose of a domestic home and only one enquiry so far for a non-domestic purpose.*
- 3.19 The supporting Marketing Statement provides evidence of the current and changing market of Alton Town Centre. It is evident that we are seeing some confidence in the commercial sector, with premises reopening and trading once more as lockdown restrictions ease. The 'High Street' is very different to pre-COVID life, however many of these changes were already taking place, but COVID accelerated the changes. It is important that the focus for the vitality and vibrancy of the town centre is centred on the primary and secondary areas of the town centre.
- 3.20 In the case of Alton town, the outlying streets beyond the town centre are transitional and mixed in use cannot all support and sustain commercial or social facilities. No 2 Amery Street has operated as a dental practice originating decades ago, when such activities were modest operations. Nowadays, the 'dental practice' is a highly commercial and competitive business, providing a vast range of orthodontic and cosmetic dental treatments. The dental facilities offered by Amery Street were significantly limited by the restrictive layout and listed status and historic fabric of the building.
- 3.21 The loss of a community facility in this location will not cause harm to the overall provision of dental care and services available in Alton. As set out above the dental practice has



relocated to the Kingsclere Dental Practice on Normandy Street. The location is very accessible to the town centre and has the advantage of being close to other community and social facilities and the surrounding residential areas.

- 3.22 There is a balance to be made in terms of the loss of the community facility, against the fact that the premises are not suitable for modern day clinics whatever the services offered. The layout of the building, with the internal floor level changes do not meet current accessibility standards. The rooms are small with low ceilings and any alterations to create better sized treatment rooms with associated facilities would be limited by the listed status.
- 3.23 The use of the building for residential purposes would see the property reverting back to its original use. Occupation of the property for residential purposes would provide the opportunity for the renovation and preservation of the property. Alterations are likely to be sought for a bathroom, but otherwise the layout and proportions of the property will work well as a residential unit.

HERITAGE ASSESSMENT

- 3.24 The application site is a Grade II listed building located within the Alton Conservation Area. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 3.25 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.
- 3.26 The East Hants Second Review 2006 sets out policies to protect or enhance the character of a conservation area and listed buildings. Policies HE6 and HE11 refer to changes of use and HE5 and HE10 alterations and extensions respectively. Specifically Policy HE11 Change of Use of a Listed Building permits the change of use if:



- a. the use proposed is of an appropriate nature and scale of activity to the architectural or historic interest and character of the building or site and its surrounding area; and
 - b. the change of use will result in the retention and continued use of the building and will not compromise its future repair or restoration.
- 3.27 The policy seeks any change of use application to include details of intended alterations. At this stage the principle only is being sought. The building was historically a dwelling and the introduction of a bathroom can be accommodated without detriment to the fabric and integrity of the heritage asset. The longterm preservation and the public benefit resulting from the listed building being established as a residence outweighs any minor alterations that may have a modest impact upon the internal fabric of the listed building.
- 3.28 The change of use permission would provide certainty for the buyer and enable them to commit to investing in the property and undertake any required works (subject to listed building consent) which will in turn ensure the future of the property is safeguarded.
- 3.29 Indeed the proposed change of use fully respects the special character of the designated area, and is seeking to reinstate an identified character feature, that being the recognition and importance of the medieval street pattern of the linear residential plots of the town area. Furthermore, the principle of the change of use of the listed building itself has no negative impact upon the significance of the heritage asset. Permitting the change of use will enable the various unsympathetic modifications to the building (the provision of treatment rooms and client facilities) to all be removed and the heritage asset to better understood and appreciated. The proposal is a positive enhancement to the integrity of the building and its significance.
- 3.30 In conclusion the change of use to residential use would be sympathetic to the special interest and significance of the building and will ensure the retention and preservation of the building for years to come. The proposal would not have any harmful impact upon the significance of the Alton Conservation Area.
- 3.31 The proposal accords with the policy intentions of the NPPF, the Second Review, the Core Strategy and the Alton Neighbourhood Plan.



AMENITY ISSUES

- 3.32 Policy CP27 of the Core Strategy protects amenities of neighbouring properties. The NPPF has a requirement that the amenities of all existing and future occupants are required.
- 3.33 The proposed change of use to residential will result in a less intensive use of the building. The property has the potential for a three-bedroom dwelling, with downstairs living areas. (The practice had three treatment rooms, plus reception and seating area – see existing floor plans). Not only is this relevant in terms of traffic generation and parking requirements (discussed below) but in the general use of the building. The property is attached to the neighbouring properties both sides. The movement and activity of clients throughout the building, throughout the day is likely to have generated constant noise and disturbance for the existing adjoining residents, particularly taking into account the age and fabric of the buildings. The use of the building as a residential property will result in more compatible usage, even allowing for the occasional noise disturbance of neighbouring residents.
- 3.34 As the property was originally a dwelling there are ample windows and openings for outlook and light. There is no further works proposed which would result in loss of light or the potential for overlooking of existing neighbours.
- 3.35 The proposed change of use would not cause any greater impact upon the amenities of the existing neighbouring residents than the former use. The property would be renovated and better maintained. It would also be continually occupied. This would be reassuring to neighbouring residents that investment is being made in the property and from a security aspect.
- 3.36 The property being historically a residential property enjoys a long linear plot to the rear, where a private garden area is in existence. In a town centre location such as this, it is a real bonus to have this private amenity space. As a commercial/business unit the garden was not required or regularly used. The garden is overgrown at present and the new chapter for the property will bring the opportunity for taming the garden and repairing the boundary wall to the south. Both will bring positive enhancement to the site and immediate locality benefitting the setting of the group of listed buildings and the wider setting of the Conservation Area. highways and parking



- 3.37 The Alton Neighbourhood Plan (ANP) and the Core Strategy set out policies for parking standards and cycle provision. Policy CP31 of the Core Strategy requires that adequate, convenient and secure vehicle and cycle storage is provided.
- 3.38 The site has no on-site car parking provision and never has. The former Dental Practice used the local parking provided in the town centre, or clients arrived on foot. Nos 1 and 3 do not have on-site car parking. These three properties are examples of the early medieval settlement pattern displaying narrow, linear plots.
- 3.39 There would be less traffic generation and parking provision required as a result of the change of use. The practice would have had more dentists and support staff than a family residing at the property. There is no on-site car parking for the property and staff and clients would have been required to park in the local public car parks or use alternative means of transport. Occupiers of the approved dwelling would be able to secure residents parking permits if required. The lack of car parking will have no greater impact upon highway safety than the former use.
- 3.40 Furthermore, the town centre location, with easy access to the shops and facilities that the town offers enables other options to the use of a car.
- 3.41 The application site can provide for the requirements of Policy CP31 and ANP Policy TR3 in respect of secure cycle storage, with ample space in the rear yard and garden area for the cycle storage provision.
- 3.42 The shortfall in on-site car parking provision is balanced against the public benefits of the recreation of a dwelling house in this special building. The change of use would provide the opportunity of investment in the building, to renovate and restore the listed building, which is in a poor state of repair. The conversion would bring enhancement and improvement to the fabric and appearance of the property. Its historical context and special qualities will be far better understood and enjoyed as a dwelling house, as originally built.

ECOLOGY

- 3.43 No works are proposed to the building. There is no requirement at this stage to provide any ecological surveys.



COMMUNITY INFRASTRUCTURE LEVY.

- 3.44 The applicant is aware that the Council has adopted CIL. The appropriate forms are submitted with the planning application.



4 CONCLUSION

- 4.1 The application proposes the change of use of a listed building formerly used as a dental practice to become a dwelling house.
- 4.2 The NPPF, the Core Strategy and Alton Neighbourhood Plan supports development in sustainable and accessible locations. Alton is identified as a location for such development.
- 4.3 Policy CP16 permits the loss of existing social infrastructure where it is demonstrated that it is no longer needed and that there are alternative facilities in the local community. The dental practice has relocated to another site within Alton.
- 4.4 No 2 Amery Street is not a suitable building for modern day clinic and treatment centre.
- 4.5 The conversion of the property to a dwelling house will bring significant public benefits with regards the preservation and enhancement of this heritage asset. The fabric and integrity of the property will be better enjoyed and the unsympathetic alterations to the building will be removed.
- 4.6 The significance of the heritage asset will be increased.
- 4.7 The character, setting and appearance of the Alton Conservation Area will be enhanced and the setting and appearance of the listed building.
- 4.8 It is accordingly requested that the planning application be granted.