WS HERITAGE



Flat 3, 78 Marine Parade, Worthing, BN11 3QE

HERITAGE IMPACT ASSESSMENT

Ref: Jo04537

July 2023

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Cover: Marine Parade, Worthing

1.0 Introduction

Purpose

1.1 Mr. Christopher Hayhoe has commissioned WS Heritage Ltd. to undertake this Heritage Impact Assessment to retrospectively address alterations to Flat 3, 78 Marine Parade, Worthing, which is a Grade II Listed Building. The document first turns to the historic background of the locale and wider area, before identifying relevant heritage assets and discussing the potential for their significance to be affected by proposals.



Figure 1: Site Location (Historic England)



Figure 2: Application Site Pre-Refurbishment (Google), 2021

Proposals

1.2 In brief, proposals comprise minor internal alterations, more general refurbishment and the replacement of non-original front windows at first floor level.

Heritage Assets

1.3 As noted, the application site itself comprises merely one component part of one property comprising the wider Grade II Listed *77-79, Marine Parade.* This was designated on 11-Oct-1949 (*List Entry Number: 1250441*). The list entry for the site may be summarised as follows:

'MARINE PARADE. 5406 Nos 77 to 79 (consec) TQ 1402 SE 4/7 11/10.49. II GV 2. Early C19. 4 storeys. Terrace of 3 houses. 8 Windows in all. Stuccoed, ground floor of Nos 78-79 rusticated. Curved fronts of 2 windows each. Cornice and parapet. Glazing bars intact. No77 has slightly lower facade than Nos 78 and 79, 2 windows only, long and short quoins, no balcony, and one ground floor window made into a door. Nos 78 and 79 are a pair, slightly larger, and have 3 windows each. Since last survey they have lost wooden balconies on the 1st floor with hoods. Stringcourses above 1st and 2nd floors.

Nos 74 to 79 (consec) form a group.

Listing NGR: TQ1455302313'

1.4 Although secondary considerations, the application site is also located within the settings of a number of listed buildings (see **Appendix 1** for the full descriptions for these heritage assets) and is further located within the *Marine Parade and Hinterland Conservation Area*, first designated on the 14th of March 2000. A conservation area appraisal exists for this designation and is dated to September 2001. The *Marine Parade and Hinterland Conservation Area Appraisal* notes that the designation displays:

'*a fine section of seafront exhibiting the evolution of seafront terraced architecture with examples from the early nineteenth century Regency period through grand Victorian to the art deco treatment of Beach Hotel*'.

1.5 This would include the application site, however, it is considered that, where discussion below establishes the fundamental appropriateness of works undertaken with respect to the listed host, that these are - in turn and by extension - equally suitable to both the overriding conservation area and the settings of relevant listed buildings.

Historic Environment Record (HER)

1.6 No Historic Environment Record entries are relevant to this application.

Archaeological Potential

1.7 Subject to consultation with Curator at full planning stages but unlikely given the nature and extent of proposals.

Consultations Undertaken

1.8 Consultation has thus far comprised liaison and therefore ongoing discussion with the local planning authority's (LPA) enforcement and conservation officers, leading to the application at hand.

Planning History

1.9 2002 - listed building consent granted for the re-roofing of the main roof slope and rear addition, alterations to valley gutters and the provision of new outlet pipe (LPA ref: *02/01150/LBC*).

Approach & Methodology

1.10 In accordance with *paragraph 194* of the *National Planning Policy Framework (NPPF, 2021)* this Heritage Impact Assessment describes the significance of those heritage asset(s) with the potential to be affected; in a manner proportionate to both the assets' importance, and an understanding of the potential for impacts upon that significance.

Methodology

1.11 A number of published guidelines were consulted and adhered to, including:

Statements of Heritage Significance: Analysing Significance in Heritage Assets - Historic England Advice Note 12, Historic England, 2019 (see **Appendix 2**);
The Setting of Heritage Assets - Historic England Good Practice Advice in Planning Note 3 (Second Edition), Historic England, December 2017; and
Conservation Principles for the Sustainable Management of the Historic Environment. (Consultation Draft), Historic England, November 2017.

2.0 History

Worthing

2.1 Worthing was originally a south coast hamlet separated from Broadwater by the tidal estuary of the Tenile stream to the north. During the Middle Ages, Worthing was a small agricultural and fishing settlement. A potential harbour was recorded at this location in 1300 and again in 1493, whilst being noted to be a member of Shoreham port in 1324. During the late 16th century, silting occurred on what is now the modern shoreline, gradually creating a land mass that was to become known as Worthing Common.



Figure 3: OS Map Extract Worthing, 1875



Figure 4: OS Map Extract Worthing, 1896

2.2 However, during the 18th century, a sustained period of erosion - caused by a shingle bar growing offshore - meant that the common gradually began to disappear, then being replaced by a new stretch of beach. The mainland also began to erode during the late 18th century, with this becoming an ongoing problem for the residents, being potentially exacerbated by the extraction of various materials from the beach front.

2.3 Worthing subsequently became a seaside resort but remained significantly quieter than comparable towns like Brighton. The more intensive development of the resort gradually intensified from the mid-18th century onward, with the town witnessing continuing growth over the following years. The first more significant developments included hotels and lodging-houses intended to host visitors to the town. Subsequently, due to the prime bathing conditions of the resort, Worthing gained a reputation for attracting the fashionable and aristocracy.

2.4 Development was to increase in the early 19th century due to the 1802 opening of a new turnpike road from Horsham to London, which facilitated the growth of traffic in and around the town. New development was characterised by a focus upon leisure and entertainment and the simultaneous provision of facilities such as chapels etc. In 1810, the town also benefitted from the opening of a market. However, coastal erosion and drainage continued to remain issues. The town therefore experienced something of a depression during the 1820's and the number of visitors to the resort declined considerably.

2.5 Towards the mid-19th century, the physical growth of the town also slowed, resulting in a surplus of housing and accommodation more generally. Problems with sanitation persisted, where sewage from the town led directly into the sea, with obvious implications for the quality of the beach and bathing. In the 1850s, these issues were nevertheless rectified by the opening of new waterworks and a main sewer, which meant that the beach could recover from the effects of this sewage. In turn, these improvements resulted in an influx of new visitors.

2.6 From the Ordnance Survey map of 1875 (**Figure 3**), it can be seen that the settlement of Worthing remained primarily focused upon the seafront where growth at this juncture comprised large residential terraces. Relatively dense settlement can also be seen to extend back from the seafront and northwards, before becoming more intermittent and then giving way to a predominantly open, rural landscape that can be seen to surround the London-Brighton South Coast Railway.

2.7 Towards the end of the 19th century, Worthing once more began to expand, whilst seeing an increase in the number of hotels and lodging-houses, although these remained of a generally smaller scale than those of the neighbouring resorts of Brighton and Eastbourne. The population also grew throughout this period, albeit inhabitants were to become characterised by a high proportion of elderly, permanent residents. At this juncture, the resort aspect of Worthing was then becoming less significant, due to the emerging emphasis on residential development.

2.8 By 1896 (**Figure 4**), the town had spread considerably west and towards Heene and West Worthing, extending along the seafront and Marine Parade. Here, several nurseries are illustrated by mapping, therefore exhibiting a relatively distinct grain when compared against the remainder of the town, although the early emergence of West Worthing's housing estates' is also shown. These properties are relatively scattered albeit some plot layout can also be seen to be evidenced and suggestive of future, already planned development. Growth can also be seen to extend north and beyond the railway line.

2.9 By this time, Worthing had become one of the most prominent glass-house fruit and flower producers in the country, in turn providing a new attraction for visitors in the form of summer and autumn shows. Issues with pollution continued however, and the town suffered a number of typhoid outbreaks, which were to considerably impact visitor numbers. At the end of the 19th century, the growth of the town therefore came to a relative standstill, with the epidemic reportedly impacting the profits of the railway fairly significantly.



Figure 5: OS Map Extract Worthing, 1909



Figure 6: OS Map Extract Worthing, 1938

2.10 At the outset of the 20th century, entertainment, leisure, services and facilities proliferated throughout the town, and it was to gradually become a popular location for visitors once more. By 1909 (**Figure 5**), development had again intensified, and a still greater number of properties then extended north towards the railway line and beyond. Due to Worthing's simultaneous emergence as a new centre for commuters to Brighton and London, the 1920s and 1930s was therefore a period of rapid expansion, with better transport links facilitating this role. The ensuing electrification of the railways contributed still further to this new growth, whilst the number of permanent residents and visitors also increased, with many again proving elderly.

2.11 After the Second World War, seaside resorts more generally benefitted from a significant increase in tourism and from their emerging role as holiday destinations. The town then became reliant on this trade, with the vast majority of visitors continuing to be over the age of 65. However, the town lacked large hotels, which differentiated it from other neighbouring seaside towns, and the residential emphasis of Worthing again proved to be more important than its function as a seaside resort.

2.12 The local council then began to promote the town as a centre of employment, encouraging the development of offices for both government and private enterprise. Due to the council's opposition to development that would encourage visitors to the resort – including still more services and facilities for leisure and entertainment - these were restricted to the pier and its more immediate locale, with Worthing going on to maintain what was a predominantly residential character. During the 20th century, the town's role as a resort therefore went on to become a secondary rather than primary function and characteristic.

77-79 Marine Parade

2.13 Against such a background, 78 Marine Parade was constructed during the early 19th century as part of a terrace of three individual dwellings comprising Nos. 77-79 Marine Parade. This was part of a wider context of dense, residential development lining Worthing seafront, some of which would in time have functioned as rented lodging houses or hotels for visitors to the resort. These properties are set back from the beach and separated from this by a road which would have provided some protection from coastline erosion, although historic drainage issues persisted and are likely to have still affected residents in the period.

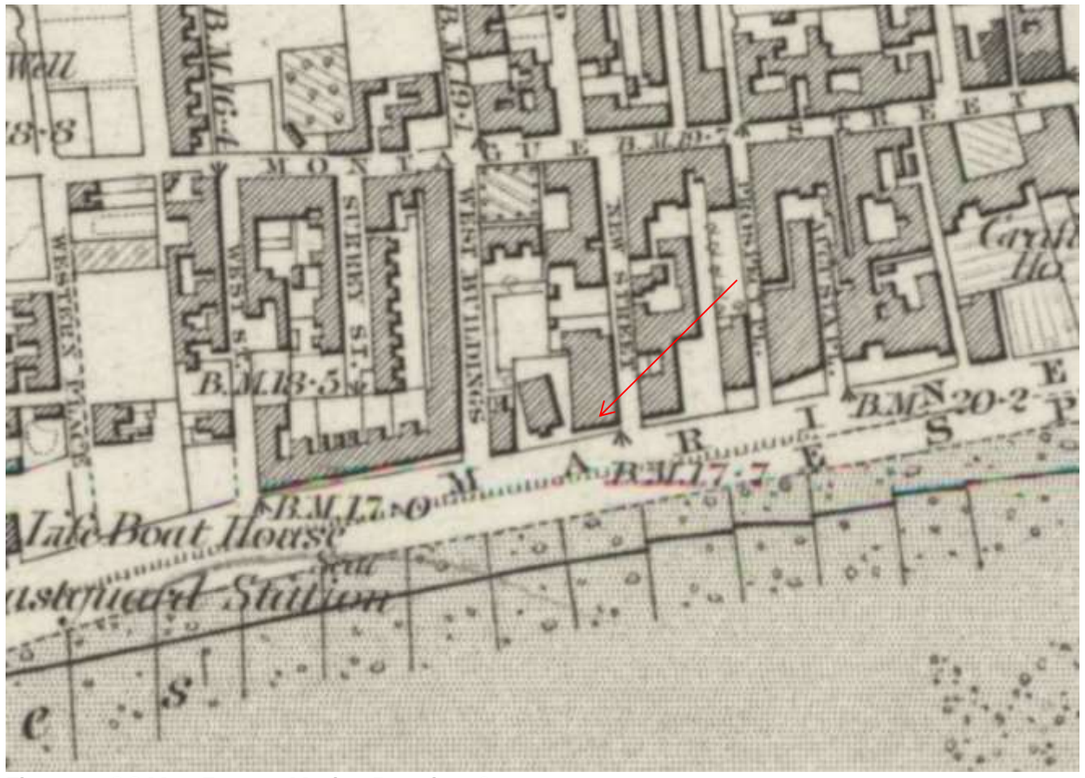


Figure 7: OS Map Extract Marine Parade, 1875

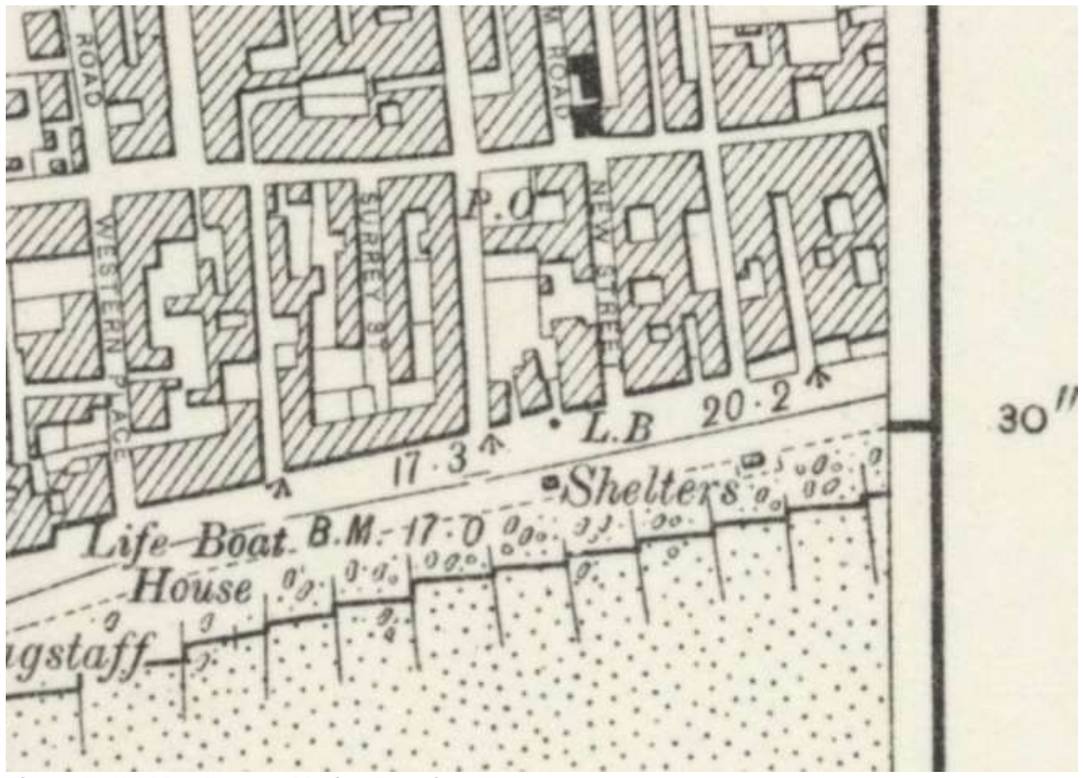


Figure 8: OS Map Extract Marine Parade, 1896

2.14 By 1875 (**Figure 7**), the terrace of three houses comprising Nos. 77-79 Marine Parade is clearly visible just off/to the west of Marine Parade's junction with New Street. Directly adjacent and to the west are two further detached houses, whilst directly west again is a modest row of properties running between West Buildings and West Street. Otherwise, development throughout the locale tended to follow an overriding grid pattern intersected by smaller streets, thus maximising the number of terraced properties that could be built in the space available.

2.15 By 1896 (**Figure 8**), little change may be observed across Nos. 77-79 Marine Parade, although the surrounding area can be seen to have become still more densely developed, with new terraces being formed along Western Place and Montague Street. Again, little change to Nos. 77-79 Marine Parade itself may be observed by 1909 (**Figure 9**), although further infilling has occurred directly to the north. The immediate surroundings also remain relatively consistent, other than a small number of extensions to terraced properties, which are again combined with modest infilling.

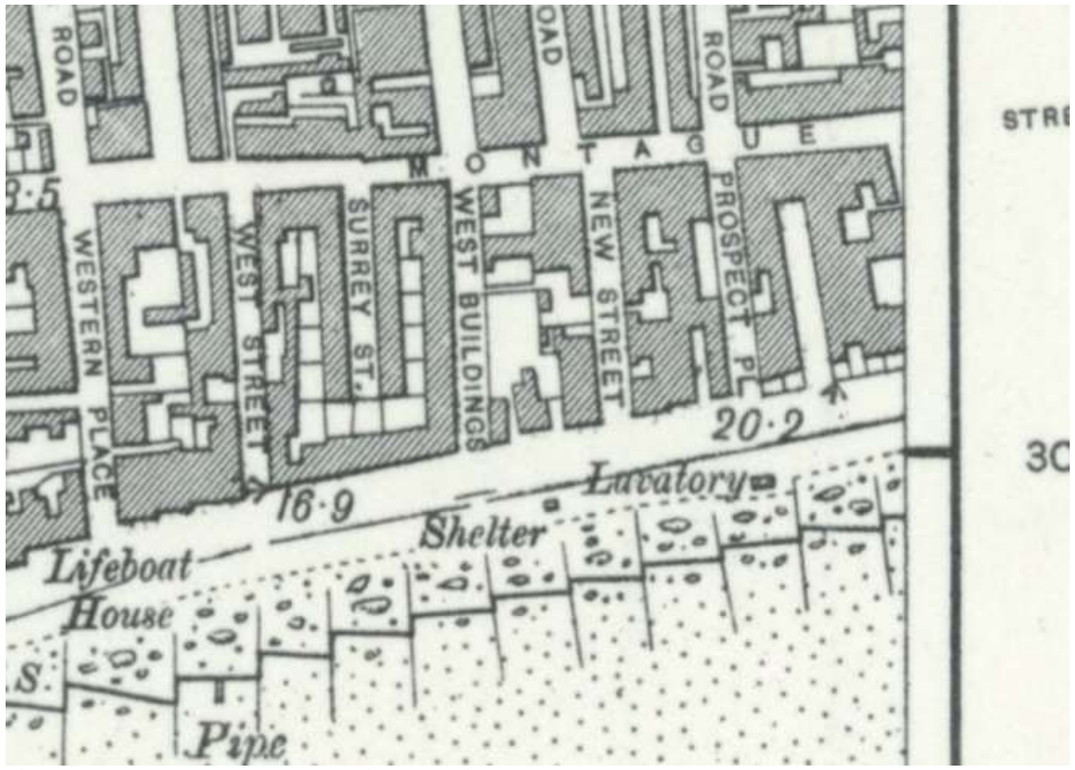


Figure 9: OS Map Extract 78 Marine Parade, 1909

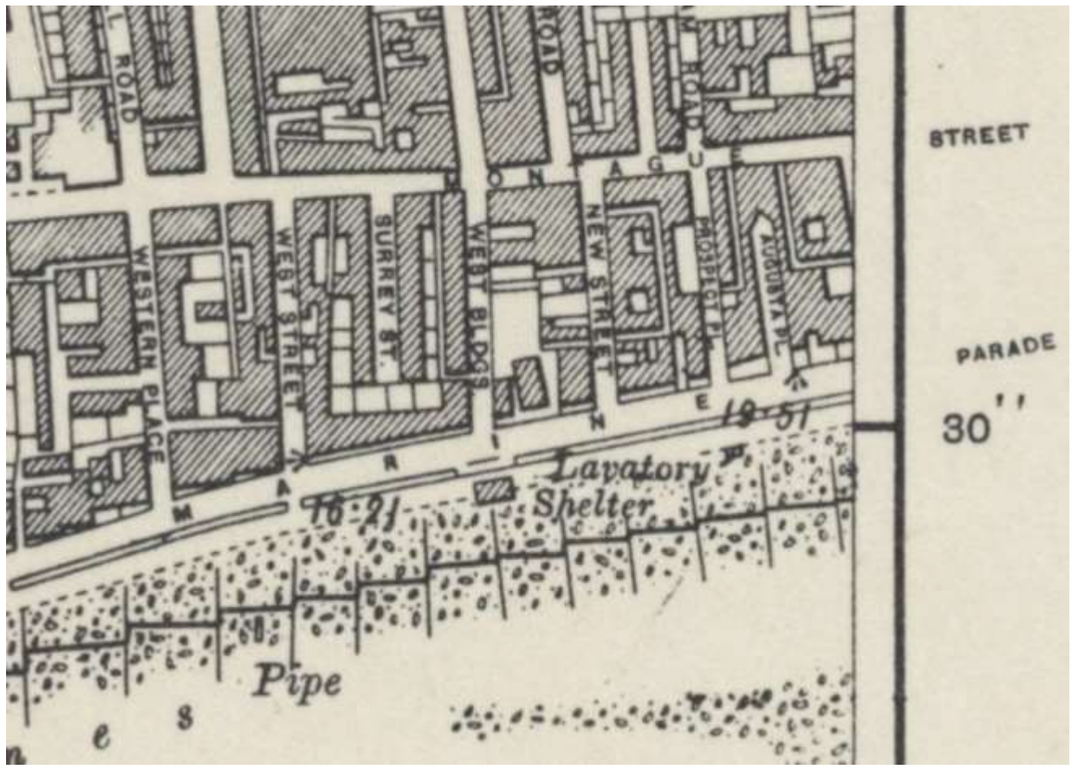


Figure 10: OS Map Extract 78 Marine Parade, 1938

2.16 Whilst 1938 mapping (**Figure 10**) again shows little appreciable change throughout the locale - but for more minor infilling and/or the extension of nearby properties - it is known that the two properties adjacent and to the west (including the Thomas Banting Memorial Convalescent Home to the immediate west (**Figure 11**)) were in 1950 subsumed, re-purposed and/or re-developed as Robert's Wine Lodge, latterly The Litten Tree (**Figure 12**). This property was in turn redeveloped following planning permitted in 2000 for the apartment block in existence at Nos.80-82 Marine Parade today (i.e. the Nautilus Apartments), which clearly sought to reflect its listed neighbours at Nos. 77-79 Marine Parade.

78 Marine Parade

2.17 Further to this, it can be seen below (see **Figure 12**) that, together, and prior to their more recent conversion to apartments (date unknown, but evidently entailing considerable reconfiguration of the interiors in order to implement a number of individual apartments and the associated services and/or facilities necessary to enable this change of use), Nos. 77-79 Marine Parade originally comprised the Ocean Hotel. These properties can in turn be seen to feature first floor balconies with hoods and, as such, the illustration definitively predates the property's 1949 designation (see **para. 1.3**, above), which notes these features to be lost.

2.18 In approximate terms, such a date is borne out by the cars and clothes that also appear in the photograph, and, to confirm this approximate date more generally, neither has the Thomas Banting Memorial Convalescent Home yet been replaced by Robert's Wine Lodge (i.e. it is a definitively pre-1950 photograph, and, again with respect to the list description, definitively pre-1949). Importantly, illustrations of the property at this date show the first floor windows of no. 78 to have already been altered and their likely distinctive bow profile to be already replaced by 'flat' French doors at this pre-designation juncture of the property's history.



Figure 11: The Thomas Banting Memorial Home (date unknown – pre-1950 (worthingpubs.com)



Figure 12: Roberts Wine Lodge (date unknown – post-1950 (worthingpubs.com)



Figure 13: The Ocean Hotel (Nos. 77-79 Marine Parade, date/source unknown – pre-1949)

3.0 Proposals

3.1 As indicated, this document discusses work already undertaken at the property without listed building consent and which, finding that works are appropriate when considered against the relevant regulatory framework, therefore supports what is a retrospective application for said consent. However, discussion below will establish that the works in question are not merely appropriate, but – except from a wholly positive perspective – essentially negligible in impact with respect to the *special interest* of the property, being fundamentally suitable to fabric comprising what is merely one, component part of the listed building in question (i.e. flat 3 of no. 78 Marine Parade, which is in turn part of a wider, overarching grouping of three former dwellings listed together as one designation). They are therefore equally appropriate to both the overriding conservation area and settings of other, nearby listed buildings.

3.2 Works can therefore be seen to accord with the *Planning (Listed Buildings & Conservation Areas) Act 1990* (the Act), which as a key directive, states at *s.7* that (my underlining) '*…no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.'* It is my view that, except insofar as resulting impacts are wholly positive, the works in question would not *affect its character as a building of special architectural or historic interest*, particularly where – insofar as such an objective is possible at this already much altered property (see discussion below) – *'great weight'* has been given the *'asset's conservation'* (*para. 199, NPPF*). However, with respect to relevant legislative requirements and the regularisation of said works, it therefore remains only to obtain listed building consent.

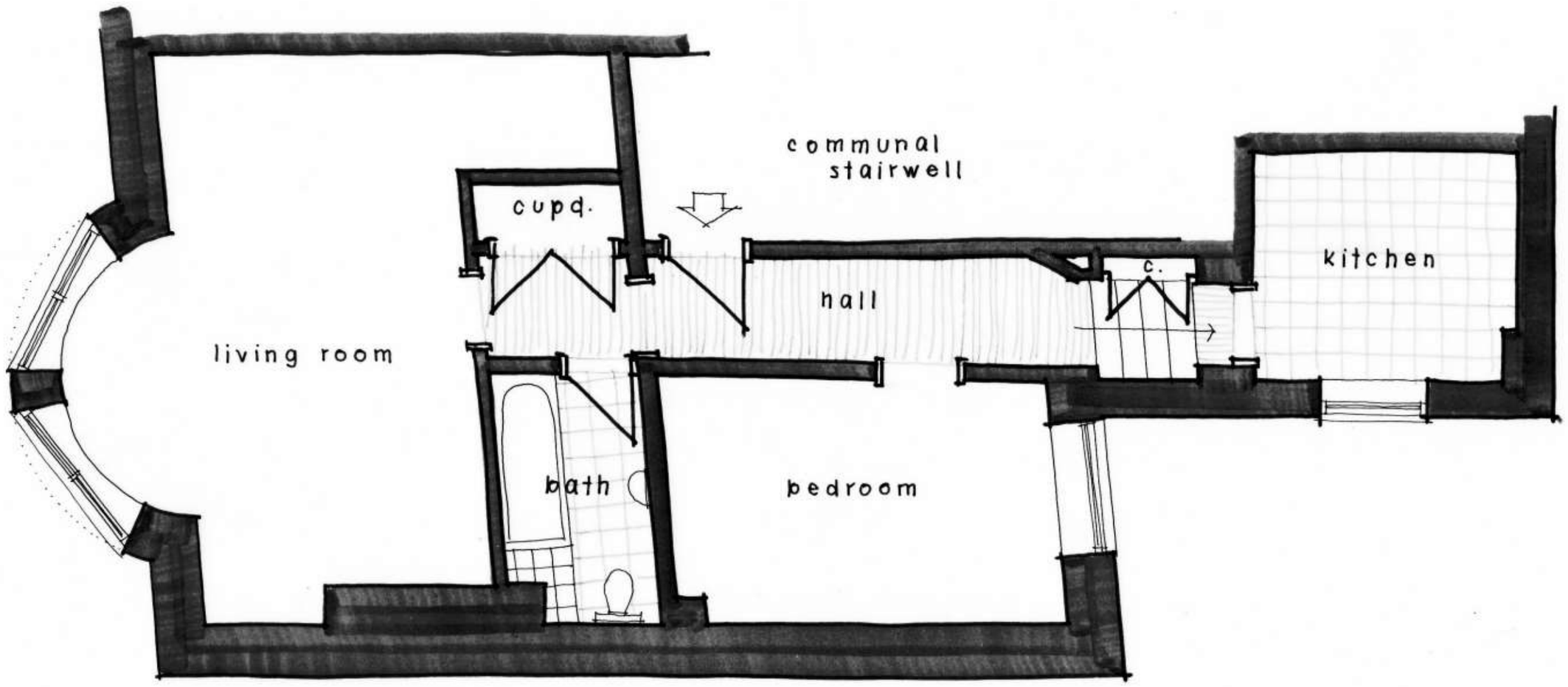


Figure 14: Former Layout

3.3 It has already been established above at **Section 2.0** that the building's more recent history has entailed no. 78's modern conversion to apartments - albeit the precise date for this conversion presently remains unknown - and therefore that the original use, functioning and as such significance of this property (including associated and/or component hierarchies) was very much compromised by this conversion. This follows changes to the use of the property much earlier in its history – from a single dwelling to link with two others; thus forming one single hotel, along with two of its neighbours; the precise juncture of which is again currently unknown but what was in any case prior to 1949 – meaning that the use, functioning and fabric of the property was likely to have been already much altered prior to its conversion to apartments.

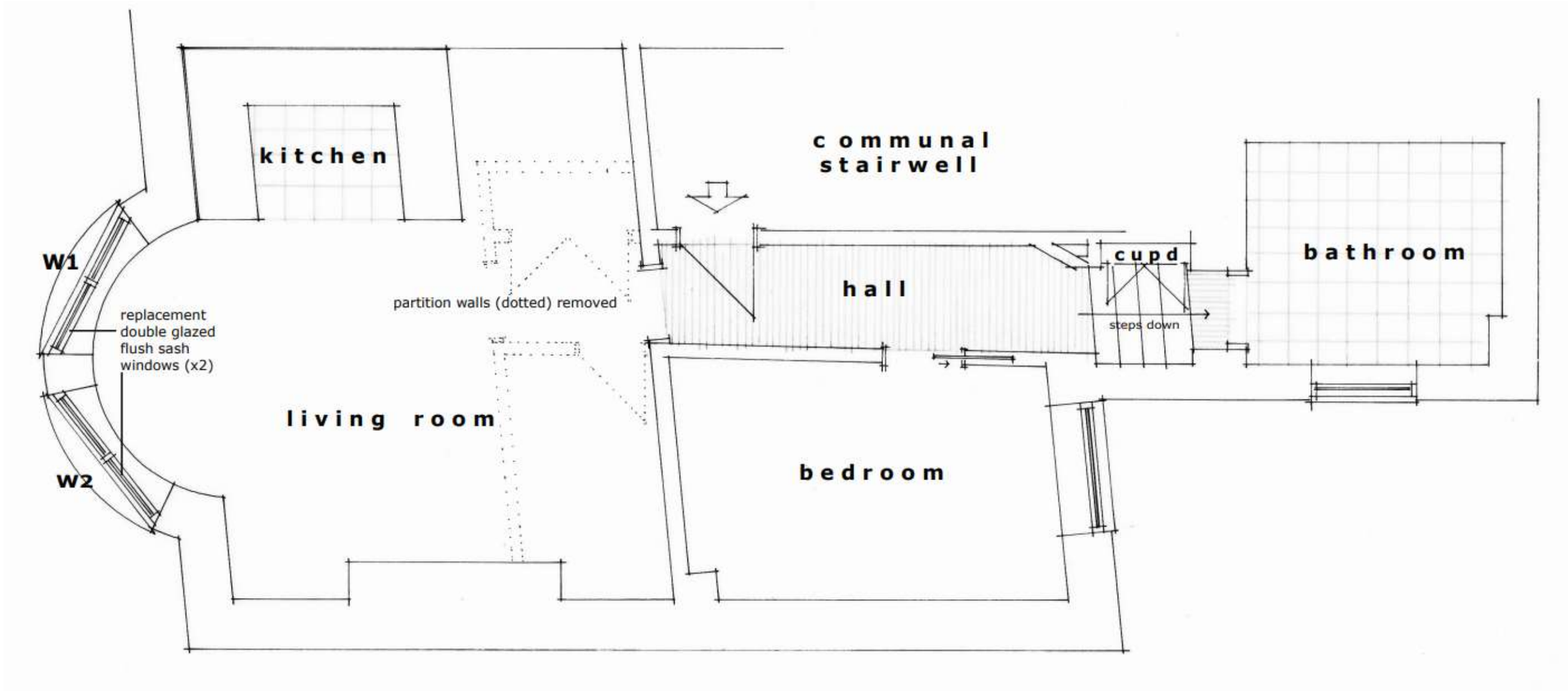


Figure 15: Existing (proposed) Layout

3.4 However, following the property's conversion to apartments, the status, quality and integrity of the listed building prior to more recent works undertaken by my client may be seen to be best illustrated by photographic records contained at **Appendix 3**. These show a principal space (i.e. the main room to the front of the resulting Flat 3) that is poorly subdivided by modern stud walling to provide a bathroom and cupboard (**Figure 14**), yet without any apparent consideration for the layout, volume or detailing of the room such as the chimney breast, skirtings (non-original and modern in any case) architraves and, more importantly, original plaster cornicing. Indeed, this imposition may be considered one that has resulted in *substantial harm* (as per the key tests of the *NPPF, paras. 199-202*), albeit one that does not successfully achieve nor prove offset by, the desired *public benefit* of *optimum viable use* (*para. 202, NPPF*).

3.5 Conversely, the more recent removal of this ill-considered studwork by my client results in not only the ability to appreciate the original volume, proportions and features of this space – the significance of which is now fully legible and therefore a feature that is now better revealed – but also, the opportunity to restore formerly impacted and much compromised cornicing whilst replacing original skirtings. From

a perspective of functioning and/or use, this aspect of works has been combined with the removal of the former bathroom from the front living space to what was formerly the kitchen at the rear of the property (yet without further impacts upon plan form or layout there), thus allowing the front, first floor room to return to its *piano nobile* manner of usage and/or functioning overlooking the seafront; an aspect best evidenced by what are at this level – comparatively – larger windows in contrast to those of other floors.

3.6 Given its role as a self-contained apartment, the requisite kitchen function has now been located in this front room (i.e. in its southwest corner), but in such a manner that is fundamentally peripheral and discreet, and one that in no way subdivides this space nor impacts negatively upon the room, its volume, proportions, detailing or the legibility/appreciation of this in the same manner as former partitioning studwork (defining the bathroom and its associated cupboard). Indeed, kitchen worktops rise only to waist height whilst associated wall-mounted cupboards remain of a merely modest depth that do not unduly protrude into the space but remain far shallower than their lower, waist-high counterparts. Other than decoration, no other physical alterations have been implemented to the interior of Flat 3 and works fundamentally restore, enhance, better reveal and thereby better *preserve* the special interest of this part of the listed building, as per the requirements of *s.16* and *s.66* of the *Act*.

3.7 Otherwise, the former front windows to this room have also been replaced. **Section 2.0**, above, shows that their preceding counterparts were already non-original, likely to have first comprised bow sash windows - as per those still adjacent and remaining to no. 79's first floor level – exchanged for French Doors sometime prior to 1949 and the designation of the listed building (see **Figure 13**, above). **Appendix 3** shows the condition of these prior to being replaced, and it is this form that those works presently under consideration have replicated in a directly matching manner. However, the inherent quality of those replacement windows presently under consideration is patently much greater. Again therefore, given the already non-original form of these windows prior to listing of the property, works cannot be interpreted as having *affected* Flat 3's *character as a building of special architectural or historic interest* (as per *s.7* of the *Act*) but again, to have *preserved* this feature in the form in which this was originally designated (as per *s.16* and *s.66* of the *Act*).

3.8 The only aspect of departure from the form of these non-original windows, is their double rather than single glazed lights, which obviously has *slight* implications for the dimensions of glazing bars etc., however, such implications are considered negligible and, again, replacement windows are in any case of a far greater quality and state of repair than their predecessors more generally. Against such a context (i.e. that former windows were non-original in any case) and at this juncture, it is necessary to emphasise the overarching thrust of the *NPPF*. Here, as part of its stated *'environmental objective' (paragraph 8(c))*, this directs *'minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'*, an objective with which – as doubled glazed windows - works undertaken would clearly align. That this is the case is further confirmed at *para. 154(b)*, where it is stated that *'New development should be planned for in ways that…can help to reduce greenhouse gas emissions…'* as in this instance, by virtue of implementing double-glazed windows.

3.9 Again, it is therefore to be emphasised that those works under consideration not only entail a significant degree of restoration more generally (i.e. in the form of fully reinstating the space, volume, proportions and detailing of Flat 3's principal front room, and legibly so), but have also replaced existing yet non original windows of a pre-designation date of origin in a matching, directly like-for-like design. This not only accords with relevant legislation from a heritage and/or design perspective (i.e. *s.7, s.16, & s.66* of the *Act*), wherein *special interest* would in no way be *affected* and *preservation* would be achieved, but further accords with relevant policy. This would include *para. 190* of the *NPPF*, which directs the *desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation*, and recognises *the wider social, cultural, economic and environmental benefits that conservation in the historic environment can bring.*

3.10 This would further include *para. 197* of the *NPPF*, which also directs LPAs to *take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation*, and *the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality*. Again, as per *para. 199* of the *NPPF*, *great weight* has patently been given the *asset's conservation*, whilst, as per *para. 202*, the *public benefits* of the proposal would include securing its *optimum viable use* over the long term. Otherwise, works accord with the overarching *environmental objective* of the *NPPF*, which directs *'minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'*, and is further confirmed at *para. 154(b)*, where it is directed that *'New development should be planned for in ways that…can help to reduce greenhouse gas emissions…'.*

4.0 Assessment

4.1 The following table sets out all heritage assets established to be relevant to proposals; their distance from the proposed application site if relevant; the degree of *'interest'* they exhibit; their inherent significance; and, how the application site presently contributes towards this. The potential for impacts upon recognised significance is then identified, along with an assessment of how such impacts are able to be mitigated.

Heritage Asset	Interest	Significance	Impact on Significance	Avoiding Impacts	Justification	Recording
Asset: *Grade II 77-79 Marine Parade* *List Entry Number: 1250441* **Date of Designation:** First designated 11-Oct-1949	**Archaeological, Architectural & Artistic Interest** The architectural interest of the asset resides in its early 19th century fabric, features and both form and detailed design. It is a stuccoed, Regency style terrace of three separate houses; each of which rises to four storeys and extends to three bays (two of which are bowed). String courses run above first and second floors. The buildings also have cornices and parapets. Nos. 78-79 have rusticated ground floor levels and are a pair, whilst no. 77 is rendered distinct by means of a slightly lower façade and the use of long and short quoins etc. These buildings previously had wooden balconies with hoods, but which have since been removed, probably in the late 1940s. **Historic Interest** Historic interest resides with the asset's role as seafront residential development emerging during the early 19th century and one of Worthing's more	The significance of this heritage asset is considered **medium** by virtue of its Grade II designation. The key significance of *77-79 Marine Parade* lies in its 19th century fabric and design, combined with the contribution made by this group toward what is a relatively coherent, historic C19 seafront evidencing a clear period of economic growth. Historically, it is equally significant as the material survival of relatively high status seafront residences that began to populate Worthing seafront during the early C19; again as part of one of the town's earlier periods of buoyancy. However, the manner in which the asset more generally evidences the varying fortunes of the town and the effects of these fluctuations upon individual buildings, their manner of use and consequent/associated alteration is also significant from a perspective of traceable evolution. Here, following their first development, with respect to the three individual dwellings' conversion to a single hotel and then flats, the interiors of the buildings can be seen to have undergone considerable erosion and loss, having been subject to several successive phases of use and associated alteration. Specifically, this would include the supersession of original interiors on numerous occasions combined with the loss of original wooden balconies, hoods and windows, which together have contributed toward the considerable loss and erosion of significance.	The application site comprises Flat 3, 78 Marine Parade, a single first-floor flat comprising merely one component part of the overriding Grade II listed *77-79 Marine Parade*; formerly three individual dwellings. Whilst merely one component part of the overriding heritage asset, the flat is nevertheless integral to this and therefore makes an important contribution toward the special interest (historic and architectural) underlying the more general significance of the asset, both internally and externally. Specifically, given the loss and erosion that has occurred to interiors, this significance is primarily attributable to the contribution made by Flat 3 toward the central, front, first floor façade of the terrace, where surviving 19th century fabric and the associated appearance of the building's exterior is its defining characteristic, along with the wider contribution made by this toward Worthing's seafront more generally. Conversely, as indicated above, the interior of Flat 3 has undergone several changes of use and therefore associated alteration throughout its history and as such, can be seen to have already been considerably evolved prior to those works	Following the implementation of works, a wholly **positive** outcome is considered to have resulted. Internal alterations have not merely restored several aspects of the property (i.e. the front, principal room's original volume, space, proportions and detailing), but also rationalised and therefore maximised available habitable living space, thereby achieving its *optimum viable use*. Otherwise, replacement windows directly replicate features that, whilst non-original, were already in place prior to designation, whilst physically and visually improving upon these non-original predecessors and thereby *preserving* the property as this appeared at the juncture of its listing. Works therefore render the property a restored, refurbished and thereby much-enhanced heritage asset with respect to its former significance. They will as such reinstate historic fabric, features, layouts and details, and the heritage asset will therefore remain fundamentally preserved. As such, a wholly **positive** impact is considered to result.	Following the implementation of works, a **beneficial** impact is considered to result given that the scheme would engender long term committed ownership of the property (thus reducing the potential for a more frequent turnover of occupant, and therefore more radical change at the site; as per best conservation practice), and therefore the sustainable upkeep, maintenance and preservation of the heritage asset in an overarching sense. Again, the scheme amply responds to the requirements of the Planning *(Listed Buildings and Conservation Areas) Act, 1990 (s.7, s.16 & s.66)* whereby the application site would be fundamentally *preserved* and its *special interest, unaffected*, except in a positive manner. This would be achieved by the implementation of what is a considered, sensitive, and therefore high-quality scheme that seeks to restore and refurbish the heritage asset, whilst enhancing the site and its environs more generally. Works therefore accord with *paragraphs 190 & 197* of the *NPPF*, where these acknowledge the *desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*. They would also accord with *paragraph 199* of the *NPPF*, which directs that *great weight* should be given the *asset's conservation*, whilst further according with *paragraph 202* of the NPPF, where *public benefit* would be generated in the form of securing the *optimum viable use* of the heritage asset. Proposals further accord with overarching *environmental objectives* of the *NPPF*, which direct *'minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'*, and	Given the very limited impact upon the significance of this heritage asset and/or its setting, further archaeological analysis and/or recording is not deemed necessary for the purposes of this application.

	buoyant periods following the introduction of the turnpike and associated growth of leisure and entertainment facilities in the town.		now under consideration (a scenario extending to its original windows). It may therefore be considered that the asset has been subject to extensive loss and erosion both prior to and following its designation, with obvious implications for its significance more generally. As such, impacts formerly made by the application site upon the significance of the overarching asset may be considered **negative.**		are further confirmed at *para. 154(b)*, where it is directed that *'New development should be planned for in ways that…can help to reduce greenhouse gas emissions…'.* Finally, proposals positively respond to local policy which seeks to *conserve and enhance the historic environment and character of Worthing*, whilst taking *opportunities to seek improvements to listed buildings and buildings within Conservation Areas when their condition has deteriorated* in accordance with *Policy DM23* of the *Worthing Local Plan (2023)*. They also respond positively to *Policy DM24* of the *Worthing Local Plan (2023)* which states that *development should not adversely affect heritage assets,* whilst stating that listed building consent will *only be granted provided that the appearance, significance, or historic character of the Listed Building is not adversely affected. The reinstatement or replication of original features such as windows or doors will be supported. Materials used must be consistent with those originally used or typical of the locality.*	

5.0 Summary

5.1 Worthing was originally a small, south coast hamlet, which subsequently evolved into a modest agricultural and/or fishing settlement during the middle ages. During the 18th century, Worthing then became a seaside resort, benefitting from the prime bathing conditions that the town could provide. Development throughout the 18th and 19th centuries was focussed on housing, hotels and lodging-houses along the seafront, before gradually expanding over time and despite various fluctuations in fortune.

5.2 Against such a background, Nos. 77-79 Marine Parade was built during the early 19th century and one of the town's more buoyant economic periods. Constructed as a terrace of three individual houses during a period of growth emphasising residential development, the three properties were in due course converted together as one hotel before being again subdivided and then converted as multiple apartments. As part of this evolution, Flat 3's original front windows can be seen to have been replaced prior to the property's 1949 designation, and the interior, to have been more recently altered to effect a number of individual apartments.

5.3 The heritage asset can therefore be seen to have undergone considerable erosion and loss. A such, the application at hand therefore seeks retrospective listed building consent for remedial works undertaken there, with the express intent of refurbishing and therefore enhancing the property's front windows whilst rationalising the interior; thereby reinstating the original plan form and/or layout along with various features and detailing. By extension, said works therefore seek to *preserve* the *special interest* of this Grade II listed building, whilst not unduly *affecting* the *special interest* of this (as per *s.7, s.16 & s.66* of the *Planning (Listed Buildings & Conservation Areas) Act 1990*).

5.4 Works would further accord with *para. 190* of the *NPPF*, which directs the *desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation*, and recognises *the wider social, cultural, economic and environmental benefits that conservation in the historic environment can bring.* They would also accord with *para. 197* of the *NPPF*, which directs LPAs to *take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation*, and *the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality*.

5.5 In order to achieve such objectives, as per *para. 199* of the *NPPF*, *great weight* has patently been given the *asset's conservation*, whilst, as per *para. 202*, the *public benefits* of the proposal would include securing its *optimum viable use* over the long term. Otherwise, works to the property's front windows accord with the overarching *environmental objective* of the *NPPF (paragraph 8(c))*, which directs *'minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'*, whilst at *para. 154(b)* directing that *'New development should be planned for in ways that…can help to reduce greenhouse gas emissions…'.*

5.6 Proposals therefore respond positively towards the historic and/or built environment whilst achieving a high standard of both detailed design and layout which respects the historic and/or architectural character of the host structure. For this reason, the principle of development is not considered to be at odds with the significance of the application site and/or its wider locale and it is respectfully requested that retrospective listed building consent is granted.

6.0 Sources

National Planning Policy Framework, 2021

Planning (Listed Buildings and Conservation Areas) Act, 1990

Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12. Historic England, 2019;

The Setting of Heritage Assets Historic England Good Practice Advice in Planning Note 3 (Second Edition). Historic England, December 2017;

Conservation Principles for the Sustainable Management of the Historic Environment. Consultation Draft. Historic England, November 2017;

A.P. Baggs, C.R.J. Currie, C.R. Elrington, S.M. Keeling and A.M. Rowland, *'Worthing', A History of the County of Sussex: Volume 6, Part 1, Bramber Rape (Southern Part)*, ed. T.P. Hudson (London, 1980), *pp. 92-97*, *British History Online* http://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp92-97 [accessed 7 July 2023]

Marine Parade and Hinterland Conservation Area Appraisal, Worthing Borough Council, 2001.

Conservation and Heritage Guide, Worthing Borough Council, 2015.

Worthing Historic Character Assessment Report, Roland B. Harris, December 2009.

Appendix 1.0 Designation Records for Heritage Asset(s)

The listed application site is located within a conservation area and within the setting of a number of statutorily designated heritage assets including:

1) ***77-79, Marine Parade – Grade II***
List entry number: 1250441
Date first listed: 11-Oct-1949
Details: 'MARINE PARADE 1. 5406 Nos 77 to 79 (consec) TQ 1402 SE 4/7 11.10.49. II GV 2. Early C19. 4 storeys. Terrace of 3 houses. 8 windows in all. Stuccoed, ground floor of Nos 78-79 rusticated. Curved fronts of 2 windows each. Cornice and parapet. Glazing bars intact. No 77 has a slightly lower facade than Nos 78 and 79, 2 windows only, long and short quoins, no balcony, and one ground floor window made into a door. Nos 78 and 79 are a pair, slightly larger, and have 3 windows each. Since last survey they have lost wooden balconies on the 1st floor with hoods. Stringcourses above 1st and 2nd floors.

Nos 74 to 79 (consec) form a group.'

2) ***75 and 76, Marine Parade – Grade II***
List entry number: 1263281
Date first listed: 11-Oct-1949
Details: 'MARINE PARADE 1. 5406 Nos 75 and 76 TQ 1402 SE 4/6 11.10.49. II GV 2. Early C19. 4 storeys and basement. 2 windows each. Stuccoed. Cornice and parapet. Wooden balcony with hood on lst floor. No 75 has a flat front with long and short quoins. No 76 has a curved front with fluted pilasters from the lst to 3rd floors. Glazing bars missing in both. Doorway of No 75 has been modernised since last survey, that of No 76 at the side in New Street has lost its Doric columns and hood supported by large consoles, but retains grooved reveal to arch.

Nos 74 to 79 (consec) form a group.'

3) ***74, Marine Parade – Grade II***
List entry number:1250458
Date first listed: 11-Oct-1949
Details: 'MARINE PARADE 1. 5406 No 74 TQ 1402 SE 4/5 11.10.49. II GV 2. Early C19. 4 storeys and attic. 2 windows. Stuccoed. Curved bay of 2 windows on all floors except attic. Pilasters at the sides from 2nd to 3rd floors. Cornice and parapet. Mansarded roof with 1 dormer. Wooden balcony with hood on 1st floor.

Nos 74 to 79 (consec) form a group.'

4) ***Marine Parade and Hinterland Conservation Area***
Date first designated: 14th March 2000

Appendix 2.0 Methodology

2.1 Historic England also provides relevant guidance in their 2019 document *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*. This document seeks to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF), and thus relevant methodologies are applied across this Statement of Significance to appropriately and clearly assess interest across relevant heritage assets.

2.2 *Advice Note 12* sets out general advice on assessing significance of heritage assets. This can be summarised as follows:

1. *Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits*
2. *Understand the significance of the asset(s)*
3. *Understand the impact of the proposal on that significance*
4. *Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF*
5. *Look for opportunities to better reveal or enhance significance*

2.3 These five steps effectively fulfil the requirements of *paragraph 194* of the *NPPF*. Such a staged approach – whereby significance is assessed before a scheme is developed – effectively ensures proposals mitigate identified negative impacts upon significance, enhancing significance where possible, and thereby evidencing how any residing harm is justified.

2.4 Given this preferred staged approach set out above, *Advice Note 12* also provides a *'suggested structure for a statement of heritage significance'.* This structure – to be adapted and applied across this Heritage Impact Assessment – can be summarised as follows:

1. **Introduction**
    a. Purpose
    b. The nature of the proposals
    c. Designation records for the heritage asset
    d. Reference(s) in the local Historic Environment Record (where relevant)
    e. Archaeological potential (where relevant)
    f. Planning history
    g. Consultations undertaken (where relevant)
    h. Approach and methodology
2. **The Heritage Asset and its Significance**
    a. Understanding the form and history of a heritage asset – set out an understanding of the heritage asset following:
        i. Familiarity with the asset itself, developed through visiting the site, carrying out, where necessary, documentary research, architectural historic and archaeological investigation, including, where necessary, fabric and comparative analysis, desk-based assessment and, if necessary, a field evaluation;
        ii. Compilation of photographs (both historic and present); elevations; historic drawings; etc of the heritage asset
        iii. An understanding of the proposals, directed towards those matters crucial in terms of the changes proposed, and therefore the impact on significance
        iv. In the development of proposals, investigative works may be carried out which increase the understanding of the heritage asset, such further understanding may usefully be noted here.
3. **Assess the Significance of the Heritage Asset – Table 1**
    a. For each heritage asset, describe the following interests:
        i. Archaeological interest – there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point;
        ii. Architectural and artistic interest – there are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, such as sculpture;
        iii. Historic interest – An interest in past lives and events, heritage assets can illustrate or be associated with them. Heritage assets with historic interest provide a material record of historic but also a meaning for communities derived from their collective experience of a place.

   b. Assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal.
4. **Impact on the Significance – Table 2**
   a. Where the proposal affects the historic fabric of the heritage asset, specify the effect on that fabric including loss or concealment of historic features and fabric which contribute to significance – both internally and externally, proposed removals and demolitions and the impact of alterations and extensions, where proposed etc;
   b. In some cases, condition and structural surveys may usefully be quoted as a means of explaining why a particular course of action has been chosen.
   c. Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.
   d. Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted.
5. **Avoid Harmful Impact(s) – Table 3**
   a. The NPPF stresses that impacts on heritage assets should be avoided. Therefore, show how the impact is to be avoided or minimised, for instance by the proposal being reversible.
   b. In some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal; this should be outlined here.
   c. As this may be a matter of the way the proposal has been designed, reference in the Design and Access Statement (where appropriate) is likely to be useful.
6. **Justification for Harmful Impacts – Table 4**
   a. This is the opportunity to describe the justification for the proposals.
7. **Recording**
   a. Where there would be an impact on the significance of the heritage asset, any further archaeological analysis and recording proposed should be detailed.
8. **Summary**
   a. Succinct explanation of the impact of the proposal on significance of heritage asset(s)and how impact on significance, both positive and negative, has been avoided, by continuing to follow the staged approach - impact on the significance, avoid harmful impact(s), justification for harmful impacts, need for recording
   b. A clear and succinct explanation of the effect of the proposal on significance of the heritage asset, and how any harm to its significance has been avoided and/or mitigated, can be helpful, as a summary of the proposal.

2.5 Stages 3 to 6 are supported by the following tables:

Table 1: Significance of the Heritage Asset

Level of Sensitivity	Designation Status
Very High	International heritage assets of outstanding universal value which fulfil the criteria for inclusion on the UNESCO World Heritage List.
High	Heritage assets of exceptional interest, and fulfil the criteria for designation at a high grade including Scheduled Monuments, Listed Buildings of Grade I or II* designation, Registered Battlefields, Registered Historic Parks and Gardens, which are considered to be nationally important.
Medium	Heritage assets of special interest that fulfil the criteria for listing and / or designation otherwise including Grade II listed buildings / Registered Park and Garden, Registered Battlefield or Protected Wreck Site or Conservation Areas. Regionally important archaeological features and areas (as defined in the Historic Environment Record).
Low	Heritage assets of moderate interest that fulfil the criteria for local listing as set out by local authority guidance or Historic England's advice note on Local Listing (2016b). Broadly defined, such assets possess architectural or historical interest that notably contributes to local distinctiveness or possesses archaeological interest that greatly contributes towards the objectives of a regional research agenda. This can include a non-designated heritage asset.
Very Low / Negligible	Sites and features noted as locally important. Other, non-designated features of cultural heritage significance. Badly preserved / damaged or very common archaeological features / buildings of little or no value at local or other scale.

Table 2: Impact on Significance

Impact on Significance	Description
High	The application site and / or element is fundamental to the key interest/s that define the significance of the asset, and of potential high or very high significance in its own right.
Medium	The application site and / or element makes an important contribution to the significance of the asset, comprising a feature of medium significance that have been affected by loss and erosion of the baseline situation.
Low	The application site and / or element makes a slight contribution to the significance of the asset, comprising a low significance and has been subject to substantial loss and erosion of baseline situation.
Neutral	The application site and / or element does not contribute to the significance of the asset.
Negative	The application site and / or element represents negative impingement which detracts from the significance of the asset.
Uncertain	Impact uncertain, more information required.

Table 3 – Avoiding Impacts

Impacts	Description
Very Positive	Following implementation and establishment of the site, the scheme will significantly better reveal, preserve or enhance the contribution the application site makes to the significance of the heritage asset and/or setting, and / or substantially contribute to the conservation of the asset.
Positive	Following implementation and establishment of the site, the scheme will better reveal, preserve or enhance the contribution the application site makes to the significance of the heritage asset and/or its setting, and / or contribution towards the conservation of the asset.
Neutral	Following implementation and establishment of the site, the scheme will preserve the contribution the application site makes towards the significance of the heritage asset and/or its setting.
Negative	Following implementation and establishment of the site, the scheme will result in the partial loss of the contribution the application site makes to the significance of the heritage asset and / or its setting, and / or will have a detrimental impact upon the conservation, preservation or enhancement of the asset.
Very Negative	Following implementation and establishment of the site, the scheme will result in the total loss of the contribution the application site makes to the significance of the heritage asset and / or its setting, and will have a significant detrimental impact upon the conservation of the heritage asset.
Uncertain	Impact uncertain, more information required.

Table 4 – Justification of Impacts

Classification	Description
Substantial Harm	The proposed change will seriously negatively alter, damage or result in significant loss to the historic and/or original fabric / setting / character and appearance, severely impacting upon the way in which the heritage asset is appreciated.
Less Than Substantial Harm	The proposed change will slightly alter, damage or result in minor loss to the historic and/or original fabric / setting / character and appearance, marginally impacting upon the way in which the heritage asset is appreciated.
No Harm / Negligible	The proposed change will cause no harm to the significance of the heritage asset, or its setting. Change will not alter the current understanding and/or significance or enhance this.
Benefit	Change will improve the current understanding of significance and how this is appreciated. Change will preserve or enhance the significance of the heritage asset.

2.6 Here it is pertinent to note that *Advice Note 12* states that *'the level of detail in a statement of heritage significance should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposals on their significance'.*

Appendix 3.0 Photographic Record



Detached Window Frames



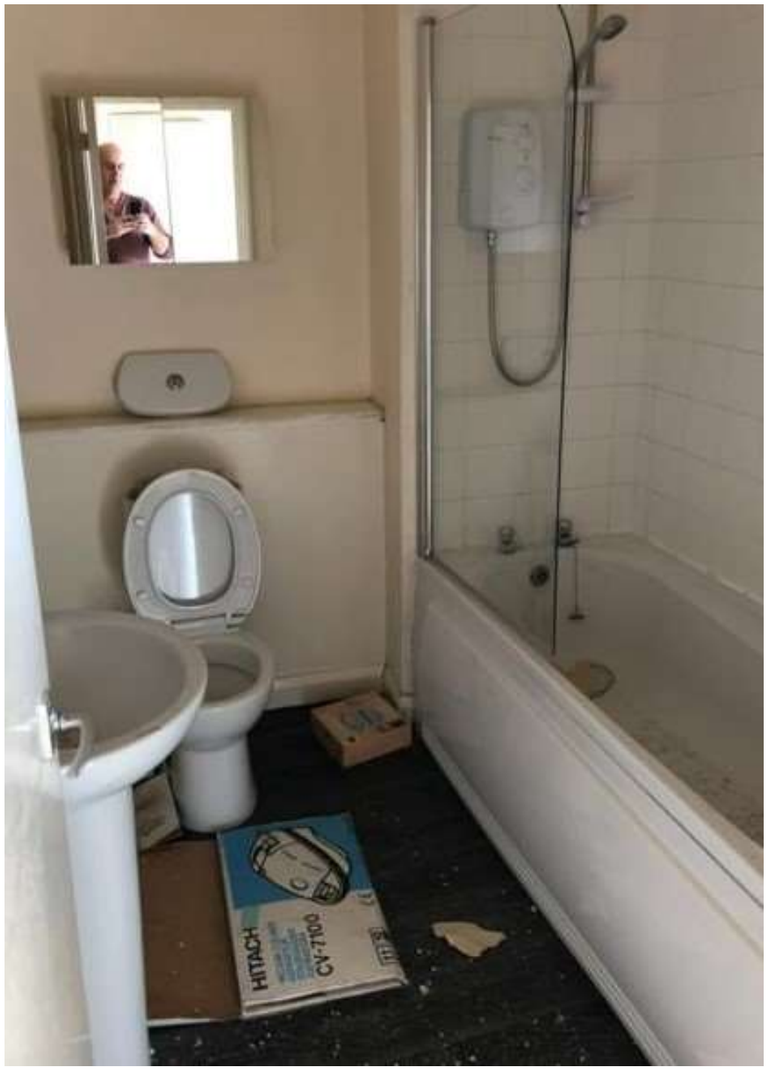
Bay Window(1)



Bay Window (2)



Lounge/Bathroom (Post-Partition Removal) (1)



Bathroom Pre-Refurbishment



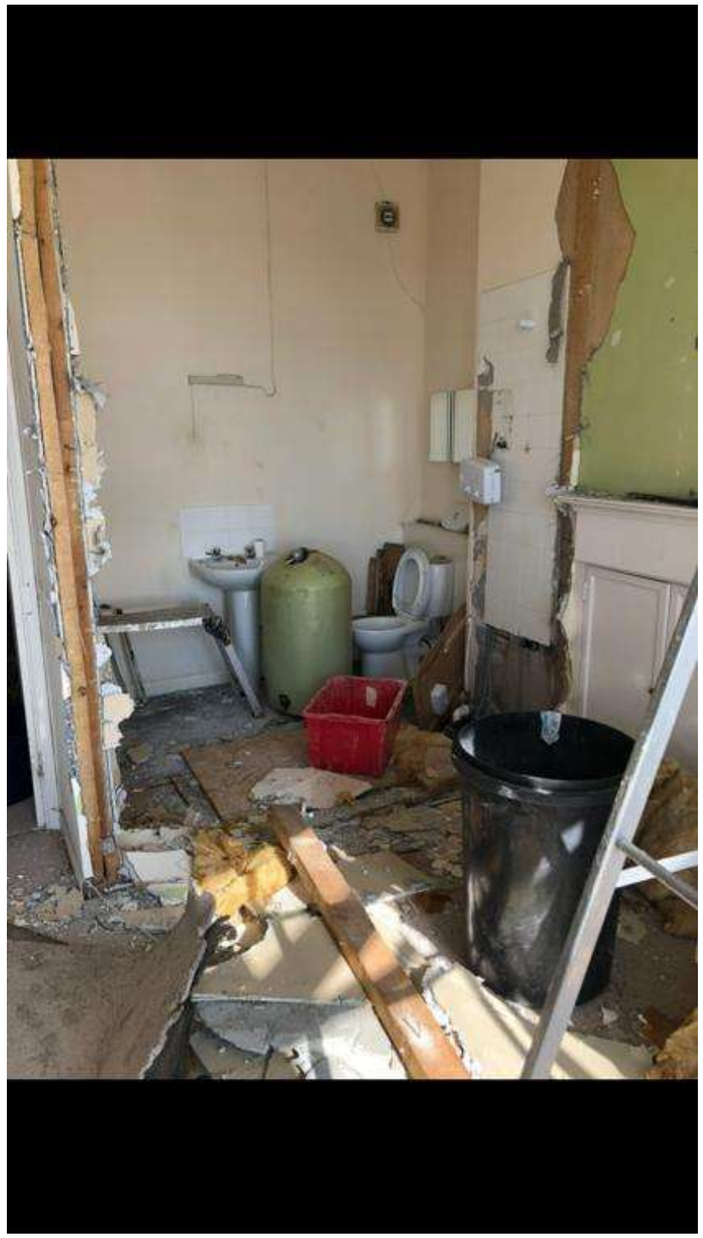
Cupboard Post Partition Removal



Lounge (Post-Partition Removal) (2)



Lounge (Post-Partition Removal) (3)



Bathroom Post-Partition Removal

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