Flat 8 Nautilus
Marine Parade
Worthing
BN11 3PR

Re: Shelter South of West Buildings - Planning Application – AWDM/0653/23 – Demolition of existing public shelter and redevelopment to provide two Use Class E(b) restaurants set over two floors.

The above application should be rejected for the following reasons:-

1. Overdevelopment
2. Interference with amenity of the area, including direct invasion of my privacy.
3. It does not preserve or enhance the character of the Conservation Area in which it is situated.
4. Interference with the attractive seafront vista from west to east towards the pier.
5. Traffic generation on the junction of Marine Parade and West Buildings.

I have expanded on these reasons below.

Overdevelopment/Interference with Amenity/Invasion of Privacy

My flat is directly opposite the proposed new development at first floor level. I have seafacing doors and balconies from which to enjoy the lovely Worthing seafront. That is the reason I purchased the property, choosing Worthing in preference to Brighton.

I attach the applicant's own plan showing the proposed size and location of the development. I have identified my flat in red. It is clear from this plan just how completely a two storey building would interpose between the Nautilus building and the seafront obscuring the windows and balcony doors on the south of the Nautilus Building. It would completely dominate that part of the seafront, the impression of height being increased because of the elevated position. My own flat and others in the Nautilus Building would be significantly adversely affected on both the south and west elevations.

Customers on the first floor of the restaurant, where glass sides are proposed, would **look directly on to my balcony and into my lounge.** Paragraph 7.22 of the applicant's Planning & Heritage Statement, filed in support of this application, makes it very clear that the applicant wants to incorporate **a high level of glazing to allow views in all directions**. That would be an unreasonable invasion of my privacy. Other flats in the Nautilus Building would also be affected and have also made objections.

The noise from outside diners, including possibly from a roof terrace, would be a real interference with the enjoyment of my property and the other Nautilus Building flats. Late night diners making their way home would also cause a nuisance to residential occupiers.

I believe that the previous planning permission for this site lapsed. The new Worthing Local Plan has since been adopted, on 28th March 2023. New applications must now be considered in the light of this Plan.

The present application is for a much larger building, actually encroaching on the beach, with a much bigger footprint than the existing heritage shelter, or any other building previously suggested. It is of a scale out of proportion to this part of the seafront.

Paragraph 1.31 of the Worthing Local Plan states that "The seafront is one of Worthing's most significant assets". Paragraph 3.46 states that "Any development on Worthing's coastline and beaches is likely to jeopardise their functions and value". Constructing such a large building, encroaching on the beach, would indeed jeopardise this beautiful asset and the vista from the west towards the pier.

The Seafront Masterplan also stated that "The seafront is the town's most important asset". That Plan proposed, in its "Seafront Strategy" at page 82, the "refurbishment of shelter to provide catering opposite Marine Parade". That is Refurbishment NOT Destruction of a heritage asset.

Conservation Area Considerations

There is a statutory obligation on the Council, when considering this application to give weight to the Conservation Area issues. Both the site and the Nautilus Building are situated within a Conservation Area. I believe that the requirements of maintaining the character of the Conservation Area outweigh the need for a large two storey bar and restaurant complex in this location.

Any proposed development of this historic part of the seafront should be undertaken with great sensitivity. In paragraph 7.13 of the applicant's own Planning and Heritage Statement the applicant accepts that "the seafront itself is a major attraction of the town". However, this application shows no such sensitivity to the seafront area. The design and massing of the building is not in keeping with the historic buildings opposite the site and will not make the seafront more attractive. Nor will it make a positive contribution to local character and distinctiveness, as required by Planning Policy Guidance.

Effect on Listed Buildings

Richard Small, the Design & Conservation Architect, in his own response to the consultation, identifies that this proposed development would cause a "greater imposition on the setting of the adjacent buildings on the other side of Marine Parade." He states that the development "does negatively alter the relationship

between the proposal and the Marine and Hinterland Conservation Area in which it is situated, as the larger footprint has resulted in a building of greater mass situated on the sea side of the promenade".

Richard Small also identifies "harm to the character of the Conservation Area and the setting of the listed building at 83 Marine Parade. There is also harm to the listed pier and the listed Lido; the proposal should therefore be resisted.

Traffic Considerations

The junction of Marine Parade and West Buildings is already busy, with heavy goods delivery vehicles serving Marks & Spencer using the route in the early hours of the morning. The addition of two restaurants right opposite that junction is going to intensify the use and possibly cause dangers to road users, including the many pedestrians who use the crossing point very close to the junction. It would also increase the noise disturbance to the many residents of flats and houses on Marine Parade and West Buildings. Both the bedrooms in my flat front the road and would suffer from increased noise.

The Applicant's Statement

The applicant's agent, Geraint John Planning has submitted a Planning and Heritage Statement which contains a number of misleading and incorrect statements. I comment on these as follows:-

CGI Photographs

The CGI pictures on pages 11 and 25 of the Statement give the misleading impression that the new building will sit nicely opposite the road forming West Buildings, with room to spare on either side, and will not form a mass in front of established buildings, blocking out the sea. That is not correct, as the attached layout plan shows how much of the Nautilus Building and the character buildings opposite on Marine Parade will be blocked.

Paragraph 2.14

It is wrong to suggest, as the Statement does, that, at a height of almost 30 feet, the new construction "would not be of a scale that would detract sufficiently from the surrounding area to warrant a refusal". The scale and design would be completely incongruous, given the beautiful aspect of the seafront and the sweeping view from the west right down to the pier and beyond.

Paragraph 4.16

The applicant points out that National Planning Policy requires developments which will enhance or better reveal the significance of Conservation Areas and make a "positive contribution" to a heritage asset. It is hard to see how demolishing the

heritage shelter, which is matched by another further down the seafront, and replacing it with this large and dominant building would be enhancing it or making any positive contribution to it. Similarly, in paragraph 6.3 the applicant quotes the requirement that, when considering the impact of a proposed development on a non-designated heritage asset, a balanced judgement is required, having regard to the scale of any harm or loss. I believe that a balanced judgement would conclude that the need for this particular large scale building does not outweigh the destruction of this heritage asset.

For all these reasons I urge the Council to safeguard Worthing's beautiful seafront and the Conservation Area and reject this application.

SYLVIA GOULDING
8 Nautilus
25th July 2023