

PLANNING STATEMENT

IN RELATION TO:

'Change of use of to provide a mixed use with a new church/community hall and Parish office, and 7 no. residential units (comprising 5 houses and 2 flats)'

St Mary's Church Hall, 25 East Street, &
No's 1 and 1a New Road, Shoreham-by-Sea,
West Sussex, BN43 5ZD

January 2026

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1. INTRODUCTION

- 1.1 Planning permission is sought on behalf of the Applicant for change of use of the property to provide a new church hall and residential units, to include loss of existing ground floor retail. The site relates to St Mary's Church Hall, 25 East Street, & No's 1 and 1a New Road, Shoreham-by-Sea.
- 1.2 This Planning Statement is submitted in support of the above Planning Application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal considering the relevant policy and all other material planning considerations.
- 1.3 The site lies within the built-up area of Shoreham by Sea, where the principle of development should be accepted. This Planning Application accords with an up-to-date development plan and should therefore be approved without delay.
- 1.4 This Planning Application should be read in conjunction with the detailed drawing package that has been prepared by the scheme's architects and the following supporting statements: -
 - Design and Access Statement, prepared by Willow Architecture.
 - Heritage Assessment, prepared by Archeology South-East.
 - Commercial Report on St. Mary's Proposals, prepared by Flude Property Consultants.
 - Flood Risk Assessment, prepared by gta Civils and Transport.
 - Archaeological Desk-Based Assessment, prepared by Archaeology Southeast.
 - Noise Impact Assessment, prepared by Acoustic South East.
 - Bat Scoping Report and Preliminary Ecological Appraisal, prepared by The Ecology Co-op.
 - Energy Statement and Calculations, prepared by ITS Consultancy.
 - Energy Performance Certificate and BRUKL Output Document.

2. SITE CONTEXT

- 2.1 The Site in question is located within Shoreham-by-Sea town centre, adjoining East Street to the west and New Road to the south.
- 2.2 The site comprises a two storey building, located on a corner site. The buildings currently comprise an Antiques shop at ground floor level, which fronts onto East Street. A Parish Centre office and Shoreham Pottery are located towards the rear and both front onto New Road. There is currently a church hall use above, at first floor level.



Fig 1. Aerial map of the site and its surroundings (Courtesy of Promap)

- 2.3 In terms of the site's constraints and designations, the Site is located within the built-up area boundary, where new development is acceptable in principle, subject to compliance with Development Plan policies.
- 2.4 It also falls within an area of archaeological interest and is close to an Air Quality Management Area. The site is within a Primary Shopping Area (**Policy 27**).
- 2.5 With respect to heritage matters, the Site is located within the Shoreham Conservation Area. There are also a number of Listed Buildings within close proximity of the site, the most notable of which being the Church of St. Mary De Haura, which is Grade I Listed and located to the west side of East Street, northwest of the site. The nearby listed buildings are identified below at **fig 2**.

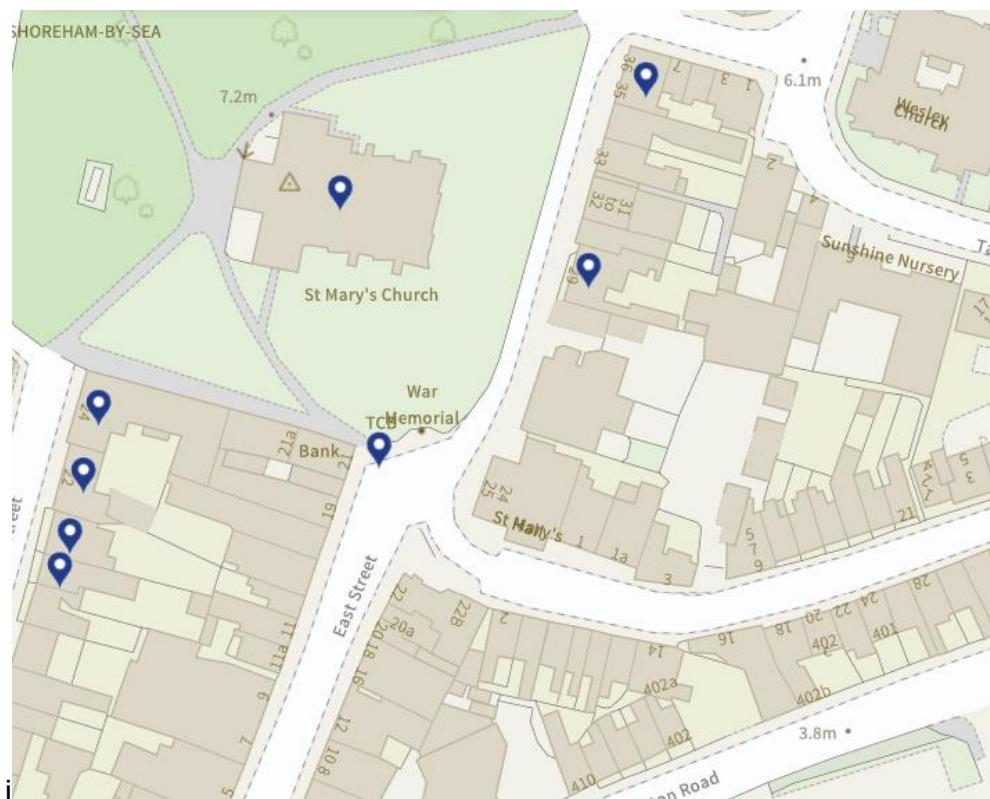


Fig 2. Extract from Historic England Map

2.6 The closest listed buildings are detailed below: -

- CHURCH OF ST MARY DE HAURA, EAST STREET (Grade I Listed Building)
- CHURCH HOUSE (Grade II Listed Building)
- K6 TELEPHONE KIOSK ADJOINING WAR MEMORIAL, EAST STREET (Grade II Listed Building)

2.7 According to the Gov.uk 'Flood Map for Planning' online resource, the site is located within Flood Zone 1, where land has a low probability of flooding from rivers and the sea.

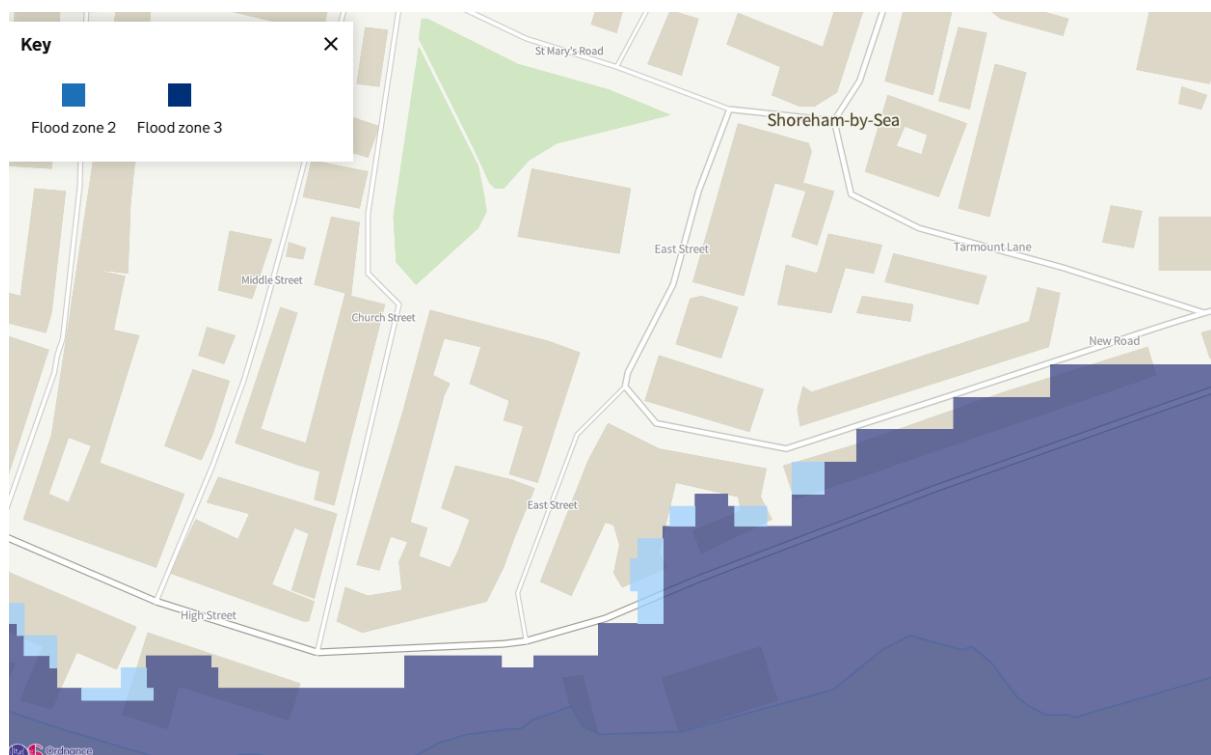


Fig 3. Extract from the Government's Flood Risk for Planning Map

3. PLANNING HISTORY AND PRE-APPLICATION ENQUIRY

(i) Planning History

Application Site

3.1 According to the Council's online planning records, 25 East Street has the following planning history: -

St. Marys Church Hall, 25 East Street

- **Planning ref: AWDM/0798/19/:** Externally fitted frame with clear Perspex screen to 4 no. first floor windows (located above 1-1a New Road) (Temporary repair works). Application Permitted 10th July 2019.
- **Planning ref: ADC/0023/09/:** Part demolition (retaining corner building no. 24) and mixed-use development (four-storey building) to provide 10 flats (9 two-bedroom and 1 three-bedroom) above ground floor retail space (site incl. 1/1a New Road). Refused 28th July 2009. Appeal Dismissed.
- **Planning ref: ADC/0024/09/:** Part demolition (retaining corner building no. 24) to enable mixed use development of 10 flats and ground floor retail space (application for conservation area consent) (site incl. 1/1a New Road). Refused 28th July 2009. Appeal Dismissed.
- **Planning ref: SU/64/77/TP.9511/:** Change of use. Application Permitted 22nd March 1977.

3.2 It will be noted that refused applications **ADC/0023/09** and **ADC/0024/09** detailed above, were considered together at appeal. At this time the three main issues were considered to be "*whether the proposal would: a) preserve or enhance the character or appearance of the CA, including preserving the setting of the grade I Listed Church of St. Mary De Haura; b) provide adequate living conditions for incoming residents having particular regard to amenity space, and avoid harming the living conditions of neighbouring residents, having particular regard to overlooking and*

outlook and; c) harmfully increase the pressure on infrastructure, having particular regard to transport, education, library facilities and the fire/ rescue service".

- 3.3 The Inspector concluded on the first issue that "*the proposed development would enhance the character and appearance of the CA and preserve the setting of the grade I listed Church of St. Mary De Haura. In doing so, the scheme would accord with established national and local planning policies that are aimed at protecting the historic environment*". Regarding residential amenity, concerns were raised regarding the creation of "*unattractive living conditions for future occupiers of the permitted end of terrace dwelling immediately to the north of the site*".
- 3.4 Notwithstanding the above points however, the Inspector went on to conclude that "*in weighing my findings on the first two mains issues and the other matters above, the benefits of the scheme would, on balance, outweigh the harm I have identified regarding living conditions. However, when the harm to educational infrastructure and the other services that I found in respect of the third main issue are also weighed, I find that permission should be withheld.*
- Appeal B should not therefore succeed. As a consequence, there would be no suitable scheme for a replacement building on the site and appeal A should also not succeed. I therefore dismiss both appeals".*
- 3.5 At the time of the appeal being considered, a draft planning obligation was in place, but had not been completed and as such, there was no mechanism in place for meeting the educational need of some incoming residents and avoiding harm to local educational infrastructure. It is our opinion that these issues could have been satisfactorily resolved if a planning obligation was completed and in place. Although some years ago, the Inspector's decision is a material planning consideration and the principle of redeveloping this site has been accepted.

1 New Road

Planning Ref: AWDM/0057/13/: Change of use from shop to office. Application Permitted 2nd April 2013

1a New Road

No planning history of relevance (other than that detailed above) is shown on the Council's online records.

(ii) Adjoining Site

Development site at 26 and 27 East Street and 3 to 9 New Road, Shoreham-by-Sea

3.6 This site, which lies immediately adjacent to the application site has the following planning history: -

- **Planning ref: AWDM/1419/23/:** Partial redevelopment and alterations to include conversion of the former bank premises and flat to form 3no houses; replacement of garage and outbuildings to north of bank with shop and maisonette; partial demolition of 7/9 New Road with first floor extension to form a one bed flat, retaining ground floor commercial premises and shopfront; alterations and rear extension of 3 New Road to form a 3-bedroom house with garden.

Application Permitted Fri 15 Dec 2023



Fig 4. Approved Site Plan (ref: AWDM/1419/23)

3.7 A similar scheme was granted approval in 2009, but this was not implemented. That scheme did not include the conversion of the ground floor of the bank premises as they were at that time still in use as a bank. The details are as follows: -

- **Planning ref: ADC/0485/08/**: Partial redevelopment and alterations to include conversion of upper floors of bank to 3 flats; replacement of garages to N. of bank with shop and maisonette; partial demolition of 7/9 New Road and extension and alteration to form cottage (retaining shopfront); partial demolition of 3 New Road and alteration into a two-bedroom house with rear garden; formation of two-bedroom maisonette over accessway; demolition of 12 garages at rear and construction of terrace of 4 two bedroom cottages and 12 parking spaces (26-27 East Street and 3-15 New Road) approved ADC/0551/08 - Demolition of garages and shed to north of 26 East Street and block of 12 garages to rear of 5-9 New Road and partial demolition of 3-9 New Road (application for Conservation Area Consent).

Application Approved 29th April 2009.

(ii) Pre Application Planning History

- 3.8 A pre application enquiry was submitted to the Council for ‘*change of use of to provide a mixed use with a new church hall and 7 no. residential units (comprising 5 houses and 2 flats)*’ (ref: PREAPP/0072/25). A written response was received via letter dated 11th July 2025.
- 3.9 This response confirms that “*the site lies within the built-up area where development is acceptable in principle, subject to compliance with Development Plan policies and any other material considerations. The site is also within the Shoreham Conservation Area. It falls within an area of archaeological interest but is not within an area of potentially contaminated land*”. It goes on to note that “*the retention and conversion of the building rather than demolition and redevelopment is welcomed*”.
- 3.10 The Council confirmed that the replacement of the dormer antiques shop with a community use is welcomed, however further information will need to be provided to consider the impact on the vitality and viability of the town centre of any loss of retail/Class E floorspace and the introduction of residential and church hall use on the ground floor. They go on to make several design recommendations.
- 3.11 The application is accompanied by a host of technical reports, including a commercial report. The current planning proposal has been fully informed by the Councils comments, and we are confident that we have fully satisfied any previous concerns regarding the change of use and design details.

4. THE PROPOSAL

- 4.1 This application proposal seeks permission to refurbish the existing group of buildings to accommodate a mix of five houses, two flats and a church/community centre for the St Mary de Haura Church and Parish Office.



Fig 5. Proposed Block Plan

- 4.2 The proposed plans show the following floor areas: -

Community Hall:	136.0 sqm
House 01:	102.4sqm
House 02:	102.5sqm
House 03:	99.5sqm
House 04:	99.4sqm
House 05:	98.2sqm
Flat A:	64.2sqm
Flat B:	104.4sqm

- 4.3 The existing community use would be retained as part of the development, albeit relocated within the East Street ground floor part of the building. It would have a floor area of 136 sqm.
- 4.4 The existing use of the ground floor of the building that fronts East Street (an antiques shop) would be lost, and this part of the building would instead become the new community use, with an active frontage that would face onto the Church to the west (which the use would be directly related to). It is proposed that the existing single-glazed shop fronts be replaced with glazed 'bi-fold' doors allowing the centre to open-up onto the East Street pavement in a similar manner to the nearby cafes and restaurants. The exterior of the East Street building will be partially restored as a part of the project.
- 4.5 The existing commercial units on to New Road are to be removed. However we question whether these units actually provide a notable retail function as existing, with one premises being currently in use as a pottery workshop (which we acknowledge does appear to include some limited retail sales), and the other (No.1) being a 'Parish Centre' office (with permission having been granted for an office use in 2013 – see AWDM/0057/13).
- 4.6 Some minor external alterations including demolition are proposed, as detailed on the submitted plans. The areas to be demolished are non-descript sections of the building located at the rear, away from public views.



Fig 6. Proposed Street Elevation – New Road



Fig 7. Proposed Street Elevation – East Street

- 4.7 The accompanying DAS confirms that *“it is currently envisaged that the community accommodation will include three main function spaces and an office as well as ancillary WC, kitchen and storage facilities. Toilet provision will include accessible compartments. The kitchen will not be equipped for the cooking of meals. An indicative internal plan is provided on the submitted drawings to convey a sense of the community centre rooms and their likely arrangement.”*. On this basis, and having taken advise from the Church (who will occupy this part of the proposed new use), it is considered that the proposals will principally be F1(f) and F2(b) use class (church and community hall uses), with ancillary Class E use (some limited sale of hot and cold food and drinks for consumption (mostly) on the premises, and an office use (to replace the current Parish Centre on New Road).

- 4.8 As set out in detail within the DAS, the proposed residential arrangement will be as follows: -

Flatted Development

The first floor above the community centre will be remodelled internally to accommodate two 2-bedroom flats. Flat B will be over two floors (first and second floor).

The New Road Houses (Houses 1-4)

The Edwardian building fronting New Road will be refurbished to accommodate four town houses occupying each of the existing structural bays.

Externally, each house is approached across a small paved front garden area enclosed with railings. To the rear, the living room of each house opens onto a planted garden through folding glazed doors.

The New Road House (House 5)

House 5 is created behind the retained Edwardian frontage to the North of the East Street building.

As with the New Road houses, the entrance to the dwelling is approached across a private paved front garden enclosed behind iron railings of design appropriate to the period of the building. The kitchen opens onto a planted rear garden.

- 4.9 Materials are set out in detail within the accompanying DAS and our client would be happy for these to be ensured via a suitably worded Planning Condition.
- 4.10 Each of the houses have amenity space to the front and rear; the front areas will be treated as semi-public and those to the rear as semi-private.
- 4.11 Nil parking provision is proposed as part of the development. Given the sustainable, town centre location, this is considered to be entirely appropriate.

- 4.12 In terms of bicycle storage, anchored loops will be provided for the locking of bicycles in the front garden of each house. There is also space provided for secure and covered bicycle storage within the rear gardens.
- 4.13 Enclosures for refuse bin storage are situated at each party fence wall. The front garden timber refuse enclosures have been sized to accept two 240-litre wheeled refuse bins. Householders will have the option of using the planted area next to the refuse store for a 240-litre garden refuse bin.

5.0 POLICY CONTEXT

a. NATIONAL PLANNING POLICY FRAMEWORK (THE NPPF’)

- 5.1 The National Planning Policy Framework (NPPF) was originally published in 2012 and has been subject to a number of revisions subsequently, with the most recent version being published on 12th December 2024.
- 5.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *“at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and to achieve sustainable development there are *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9).

- 5.4 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*
- 5.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”*.
- 5.6 Paragraph 14 is relevant in this case. It states *“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70);*
- 5.7 Section 4 of the Plan refers to Decision Making. At paragraph 39 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.
- 5.8 The Framework also sets out that there are only limited circumstances where decision-makers should give weight to policies in emerging plans, and generally *“refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan”* (paragraph 51).
- 5.9 Section 5 relates to delivering a sufficient supply of homes. It reiterates at paragraph 61 that the Government’s objective is to significantly boost the supply of new homes. Paragraph 65 confirms that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

- 5.10 Paragraph 72 states that “*strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a) specific, deliverable sites for five years following the intended date of adoption; and*
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period”.*
- 5.11 Paragraph 73 continues “*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
 - b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;*
 - c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
 - d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
 - e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes”.*

5.12 With regard to housing supply, paragraph 78 states that “*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*³⁹ *The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

- a) 5% to ensure choice and competition in the market for land; or
- b) 20% where there has been significant under delivery⁴⁰ of housing over the previous three years, to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance”.

5.13 Section 6 relates to Building a strong, competitive economy. Paragraph 85 states that “*planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”.

5.14 Section 7 relates to Ensuring the vitality of town centres. Paragraph 90 states that “*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:*

- (a) *define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
- (b) *define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
- (c) *retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
- (d) *allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
- (e) *where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
- (f) *recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites".*

- 5.15 Section 9 discusses promoting sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.

- 5.16 At paragraph 110 the Framework confirms that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making*”.
- 5.17 Paragraph 113 sets out that “*Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport*”.
- 5.18 Paragraph 115 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide:
- (a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- (b) *safe and suitable access to the site can be achieved for all users;*
- (c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and*
- (d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach*”.
- 5.19 At paragraph 116, the framework also confirms that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios*”.

- 5.20 Section 11 is entitled 'Making effective use of land'. Paragraph 119 confirms that *"planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions".*
- 5.21 Paragraph 125 sets out that decision makers are required to give regard to benefits of development, including environmental gains, and should *"(c) give substantial weight to the value of using suitable brownfield land within settlements for homes ...[and] (d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively..."*.
- 5.22 Paragraph 127 states that *"decisions need to reflect changes in the demand for land.... applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area".*
- 5.23 Paragraph 129 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability, existing character and setting, and *"the importance of securing well-designed, attractive and healthy places."*
- 5.24 Section 12 refers to achieving well-designed and beautiful places. Paragraph 131 states *"the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development..."*.
- 5.25 Paragraph 135 sets out that *"decisions should ensure that developments: (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

(d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ⁵¹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".

- 5.26 Paragraph 139 confirms that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes".
- 5.27 Section 16 relates to Conserving and Enhancing the Historic Environment. Paragraph 207 states that "in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".
- 5.28 Paragraph 212 states that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to

the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".

- 5.29 Paragraph 215 states 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 including, where appropriate, securing its optimum viable use*".

b. LOCAL PLANNING POLICY

- 5.30 The Adur Local Plan was adopted at a meeting of Adur Full Council on 14th December 2017. The new Local Plan sets the strategic development and land-use priorities for Adur (outside of the South Downs National Park) up to 2032 and contains the policies against which development management decisions within that area will be made. It replaces the saved policies of the Adur Local Plan 1996 as the Council's Local Plan.
- 5.31 The Council's Proposals Map (refer to **Fig 8** below) shows the Application site is located within the built-up area boundary for Shoreham by Sea. The site is also within the Shoreham Conservation Area. It falls within an area of archaeological interest but is not within an area of potentially contaminated land. Finally, the site is within the primary shopping area and is designated as a primary retail frontage (**policy 27** of the Adur Local Plan).

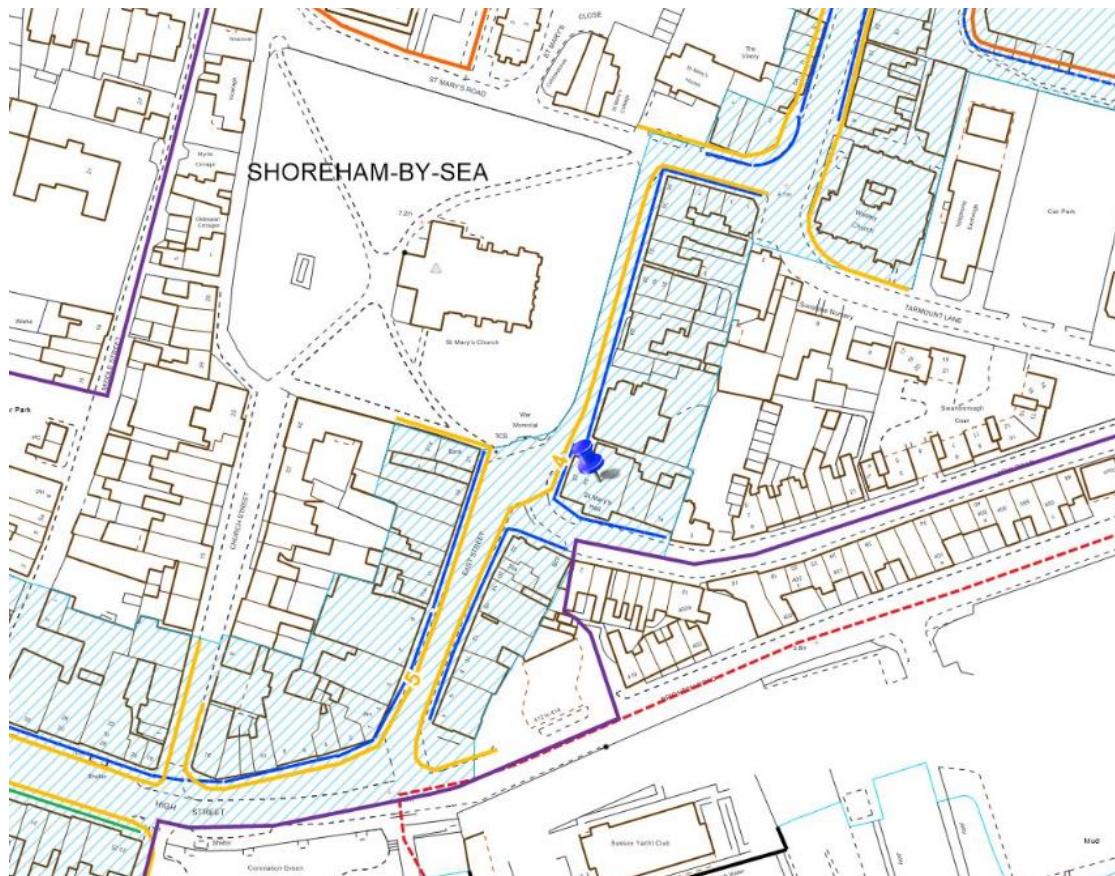


Fig 8. Extract from Adur Policies Map 2023 Interactive Map

- 5.32 **Policy 3** refers to the district's housing provision. Within the Plan period (2011-2032) a minimum of 3,718 dwellings are to be provided, with 1,538 units to be within the built-up area. This equates to an annual target of 177 dwellings per year over the 21 year plan period, which is notably less than the District's housing need, both now and at the time of the ALP being adopted. Indeed, the Planning Inspector's report on the examination of the ALP (dated 29th September 2017) noted that the objectively assessed housing need (OAN) at that time was 325 dwellings per annum (dpa), or 6,825 over the Plan period.
- 5.33 Since 2017, the previous Government amended the standard methodology – which is used for calculating future housing needs. At that time the methodology advised that Adur's housing need had increased to 449 dwellings per annum. In December

2024, the Labour Government amended the calculation for the standard methodology, and Adur's revised figure is understood to now be 547 dpa. The constrained nature of Adur District was accepted by the previous Inspector as justification for a lower ALP housing figure of 177 dpa. Our understanding is that the new standard method figure (547 dpa) is now a mandatory requirement.

- 5.34 Therefore, the demand for housing in Adur District has risen from 325 dpa to 547 dpa since the last Local Plan was adopted. The current ALP is therefore significantly underdelivering in this respect.
- 5.35 **Policy 15** is a detailed design policy, entitled 'Quality of the Built Environment and Public Realm'. It says as follows (*inter alia*):
- "Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. Development should:*
- Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development;*
 - Include a layout and design which take account of the potential users of the site...*
 - Make a positive contribution to the sense of place, local character and distinctiveness of an area; and not have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook or open amenity space;*
 - Respect the existing natural features of the site, including land form, trees and biodiversity and contribute positively to biodiversity;*

- *Have safe access to the highway network, and not result in harm to highway safety;*
- *Have acceptable parking arrangements (in terms of amount and layout);*
- *Take into account the need for waste reduction and recycling, both during the construction phase and over the lifetime of the development..."*

- 5.36 The supporting text to Policy 15 highlights the importance of respecting local spatial character and pattern of existing development. It says “*The quality of new design plays an important part in creating successful developments – well-designed developments relate well to existing buildings and spaces around them, are pleasant to use and take account of local distinctiveness without necessarily replicating what is already there... Existing poor design should not set a precedent... New developments should be well-designed and integrated into the landscape and townscape, and contribute positively to Adur's character and distinctiveness. These matters should be taken account of when developing proposals for new development. The urban areas of Adur have differing characters (see Appendix 2: A Spatial Portrait of Adur), which should be taken account of, and be respected by, new development. Good design encompasses architectural design, form, height, scale, siting, layout, density, orientation, materials, parking and open space/green infrastructure.”*
- 5.37 **Policy 20**, which refers to Housing Mix and Quality, requires the provision of “*family sized units*” on infill developments (defined as 2-3 bedrooms), and “*New dwellings across all tenures will be expected to meet the minimum nationally described space standards*”.
- 5.38 **Policy 22** sets out density requirements for development across the district. It says that “*New residential developments should achieve densities of a minimum of 35 dwellings per hectare... In exceptional cases residential development may be permitted at a lower density, where it is demonstrated by the applicant to the*

satisfaction of the Local Planning Authority that the minimum density specified above would result in an unacceptable impact on the surrounding area. Proposals for new dwellings will be expected to comply with the criteria contained in the Council's adopted Development Management Standard No.1 "Space Around New Dwellings and Flats" or any other appropriate national standard."

5.39 The supporting text to Policy 22 clarifies that *"Controlling density does not in itself create a good quality environment. Sufficient external space around and between new homes is an important factor in the creation of a pleasant residential environment contributing to the character, identity and appearance of an area."*

5.40 **Policy 27** (Retail, Town Centres and Local Parades) states that *"within the defined town centre boundaries of Shoreham-by-Sea, Southwick and Lancing (as shown on the Policies Map), town centre uses will be permitted, subject to compliance with other relevant policies.*

Development within the primary and secondary shopping frontages will need to be in accordance with the place based policies in Part Three of this Plan.

New development for town centre uses outside of the defined town centre boundary (or Primary Shopping Area in the case of retail uses) will be assessed in accordance with the National Planning Policy Framework sequential test. An impact assessment will be required for any proposed retail development outside of the Primary Shopping Area with a net sales floorspace of 1000sqm or more.

In the areas designated as local shopping parades, shopping and other town centre uses will be supported at ground floor level but a predominant shopping use (as defined in the Town and Country Planning (Use Classes) Order 1987 as amended) on ground floor premises will be retained. Where proposals would result in there no longer being a predominant shopping use, this will only be acceptable

5.41 The following policies of the Local Plan are of relevance: -

- **Policy 2: Spatial Strategy**

- **Policy 11:** Shoreham-by-Sea
- **Policy 16:** A Strategic Approach to the Historic Environment
- **Policy 17:** The Historic Environment
- **Policy 18:** Sustainable Design
- **Policy 19:** Decentralised Energy and Standalone Energy Schemes
- **Policy 21:** Affordable Housing
- **Policy 27:** Retail, Town Centres and Local Parades
- **Policy 28:** Transport and Connectivity
- **Policy 31:** Biodiversity
- **Policy 33:** Planning and Sustainable Communities
- **Policy 34:** Pollution and Contamination
- **Policy 36:** Flood Risk and Sustainable Drainage.

5.42 It is understood that the site is outside of any designated Neighbourhood Plan area.

D. OTHER RELEVANT POLICY GUIDANCE

- 5.43 The District Council has adopted the following Supplementary Planning Documents (SPDs), which are of relevance: -
- Development Control Standard – Space around dwellings and flats.
 - Adur Interim Affordable Housing Position Statement.

F. EMERGING PLANNING POLICY

5.44 Emerging Adur Local Plan

We are aware that Adur District Council has started work on preparing a new Adur local plan. The Council's website states that the "*latest Local Development Scheme for Adur indicates that the Plan will be progressed under the new national planning system introduced by the Levelling Up and Regeneration Act 2023. The government has not yet published the regulations for this new system. It is expected that these will be published in 2026*".

6. PLANNING ASSESSMENT

Principle of Development, and Five-year housing land supply

- 6.1 It is acknowledged that the application site is located within the Built-up Area Boundary for Shoreham by Sea, where the principle of new development is accepted subject to other policies in the plan. The site is located within Shoreham Conservation Area and close to a number of Listed Buildings, including the Church of St. Mary De Haura. The site also falls within a Primary Shopping Area, an area of archaeological interest and is close to an Air Quality Management Area.
- 6.2 The current development proposal includes some demolition, and we are therefore aware that Conservation Area Consent will be required. However this proposed demolition works are of a very minor nature and do not adversely affect the existing building's character and appearance. Indeed, we contend that the minor demolition that is included with these proposals provide a visual enhancement.
- 6.3 At the time of the previous planning appeal being considered in relation to the site, the Inspector stated that *"the CA [Conservation Area] covers the historic core of the town and contains the 12th Century Church of St. Mary De Haura. The church tower rises above all other buildings within the CA and is prominent in views from outside the area, including from Shoreham Beach to the south. Within the CA there are glimpses of the church though the narrow streets and close-knit urban grain. This landmark building is a very attractive and important feature of the town.*

The CA also contains residential and retail uses and buildings of different sizes and designs. Whilst most of the dwellings are two storey, pitched roofed terraced houses there are also some flats. There is greater variation in the scale and design of buildings within the commercial areas. These include three and four storey properties and some flat roof buildings.

The appeal site is situated on the corner of East Street and New Road. It includes a two-storey 19th century building (24 East Street) and a two storey early

20th century building with a tall parapet-walled façade to New Road. The site lies at the junction of three different character areas as defined in the Councils conservation area character appraisal and has been identified as a 'key site' for the preparation of a development brief. The CAA has been subject to public consultation and can be given much weight in these appeals.

24 East Street turns the corner within New Road and was built as a school. It is identified within the CAA as making a positive contribution to the townscape. Nevertheless, the building has been much altered. It includes bland shop fronts and, at upper floor level, a blank roughcast rendered south facing gable. The East Street entrance to church hall alongside does not possess any special architectural qualities and has a rather 'tired' appearance.

Where the corner of the early 20th century building meets 24 East Street it juts forward towards New Road. It narrows the footway and emphasizes the ungainly mass of the church hall. The principle elevation of this building is a rather confused mix of architectural styles and materials. The Council informed me that it makes a "neutral verging on a negative" contribution to the CA..".

- 6.4 The NPPF states at paragraph 62 that “*to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”. In this regard it is understood that neighbouring Brighton & Hove have a significant unmet housing need.
- 6.5 Critically, the revised Standard Method for calculating housing needs is now mandatory, not advisory. Therefore, the previous approach of accepting a Local Plan housing figure below the accepted OAN is no longer acceptable. This has significant implications for Adur District, and therefore there is an increased requirement for the Council to approve sustainable residential development.

- 6.6 In addition, it is understood that the Council are unable to demonstrate a five-year housing land supply (5YHLS) at the current time. The Adur Five Year Housing Land Supply 2024- 2029 (with a 20% buffer) demonstrates a 3.3 year supply of deliverable land as of 1st April 2025 against the Standard Methodology figure of 547.
- 6.7 The Government's latest housing delivery test results, which were published in December 2024, confirms that the District Council failed to meet the housing requirements for the past 3 years, with a result of 81%. The consequence of this is that the 20% buffer on the 5YHLS calculation is applicable.
- 6.8 Given the above failure of the Council to demonstrate a 5YHLS, and that the Local Plan (adopted in 2017) is out of date, it is clear that paragraph 11(d) of the NPPF is engaged and the 'tilted balance' should be applied to proposals for new housing. We contend that permission should be granted for housing development at this site given that any adverse impacts of doing so would not significantly and demonstrably outweigh the benefits of providing new housing in this location. As set out below, the site is located within a highly sustainable location, the proposals make effective use of land and will secure a well-designed place. Further we contend that the policies that protect areas or assets of particular importance (e.g. Listed Buildings/ Conservation Areas), in this case do not provide a strong reason for refusing the development proposed.
- 6.9 Finally, section 7 of the NPPF relates to ensuring the vitality of town centres. Paragraph 90 states that "*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should: ... (f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites*".

6.10 Therefore, the principle of change of use of this site to provide new residential units within what is an eminently sustainable location (see below) must be considered acceptable, and we consider that proposals are in full accordance with the NPPF when read as a whole, including paragraph 11.

Sustainability

- 6.11 The application site is positioned in a highly sustainable location within the town centre of Shoreham-by-Sea. The area has close links to neighbouring Lancing and Southwick town centres, with Worthing to the west and Brighton to the east.
- 6.12 The site is currently positioned within easy access of all services that are required by modern living, including a good range of shops and other facilities in Shoreham town centre. This access to a range of services and facilities is further evidenced by the information set out below: -

Transport

- **Bus Service** – There are 29 bus stops within a 1 km radius of the site, with the closest bus stop being located along Ham Road. There is also a main bus route running along Shoreham High Street.
- **Railway Station** - The closest railway station is in Shoreham-by-Sea, 240 yards from the site.

Local Services

- **Hospital** – Worthing Hospital is located 4.1 miles from the site.
- **Doctors** – Adur Health Partnership is located 130 yards from the site with Northbourne Medical Centre 0.8 miles.
- **Shopping** – The site is located within a Primary Shopping Area of Shoreham Town Centre, with a wide range of services within walking distance. Shoreham-by-Sea is home to a variety of uses including a Community Centre,

Churches, Post Office, Library, Banking Hub and variety of Class E commercial Uses such as Estate Agents, Pharmacies, Co-op, Hairdresser, Beauty /Salons.

Schools

The following primary and secondary schools are located within close proximity of the site: -

- **Primary Schools**

Swiss Gardens Primary School (550 yards); Shoreham Beach Primary School (710 yards); Buckingham Park Primary School (730 yards).

- **Secondary Schools**

Shoreham College (1.2 miles); Shoreham Academy (1.3 miles); Lancing College (1.6 miles); Portslade Aldridge Community Academy (2.4 miles); Sir Robert Woodard Academy (2.5 miles).

- 6.13 It is our opinion that this site would represent a highly sustainable location for new housing development, through the efficient re-use of an existing building.

Change of Use

- 6.14 The proposal seeks change of use of the property to provide a new church hall and residential units, to include loss of existing ground floor retail. As outlined above, the site is located within the defined built-up area boundary where the principle of new development is accepted.
- 6.15 The Council's interactive maps confirms that the site is located within a Primary Shopping Area, where **Policy 27** relates. **Policy 27** (Retail, Town Centres and Local Parades) states that "...*where proposals would result in there no longer being a predominant shopping use, this will only be acceptable where it can be demonstrated that retail is no longer a viable use in that unit, particularly where it has remained vacant for a long period (normally a minimum of one year) and that reasonable attempts have been made to market it for retail purposes*".

- 6.16 The Council considered the change of use of the building as part of the pre-application enquiry, noting that the *“retention and conversion of the building rather than demolition and redevelopment is welcomed. However, while community facilities are proposed within the former antiques shop, the proposal will result in the loss of two ground floor commercial units fronting New Road. The site is within the primary shopping area and is designated as a primary retail frontage (policy 27 of the Adur Local Plan). Policy 11 states that in this location (Block 4) A1 and A3 (now Class E) uses are appropriate. These proposals therefore deviate from this. The Adur Retail and Town Centres Study (2024) continues to support the current Primary Shopping Area boundary and the policy approach of maintaining Class E in this location and maintaining active frontages at ground floor. It recommends the key policy tests in this location are that any alternative use would enhance the character of the centre, they would be compatible with surrounding uses, generate pedestrian activity, not result in adverse amenity impacts, and it can be demonstrated that that the unit does not have a realistic prospect of being occupied as a Class E use through evidence of long-term vacancy (in our experience, an 18-month period is often required) and proactive marketing.*
- The adjacent development AWDM/1419/23 provides new and refurbished commercial floorspace as part of a mixed use scheme. Marketing information had been provided to demonstrate the bank had been vacant for a long period of time and marketed without interest. Furthermore the bank was previously a residential property so its loss and return to housing was considered appropriate and its loss was partly offset by the provision of the new, modern commercial units to the north, plus the refurbishment of the former butcher's shop in New Road. The commercial units have a Class E (a), (b) and (c) restriction.*
- Further information will therefore need to be provided to consider the impact on the vitality and viability of the town centre of any loss of retail/Class E floorspace and the introduction of residential and church hall use on the ground floor. The benefits of providing improved accessibility for a ground floor community use as well as a*

weighing up of the benefits of new town centre housing as part of the wider planning balance will need to be taken into account when considering this aspect.

6.17 The justification for the proposed use and the loss of the existing uses has been considered fully as part of this development proposal and the Planning Application is accompanied by a Commercial Report, which has been prepared by Flude Property Consultants.

6.18 The application property is owned by the New Shoreham Church Trust, known as the local Church - St Mary de Haura. The commercial report describes the sites as follows: -

"The subject property comprises a mixed used building, with commercial premises to the ground floor on both East Street and New Road, with the upper floors in use as a Community Hall, Meeting Room and associated ancillary spaces. The community hall is accessible via an entrance at 25 East Street, Shoreham-by-Sea.

The general external construction consists of traditional brick construction and accented with rendered pebble dashed panels to the upper elevations. The windows are timber framed and single glazed to the ground and first floors. The roof is pitched, with slate grey tiling, and the design allows for four number dormer windows on the southern elevation and three on the northern elevation. This area is masked with a masonry parapet wall above the windows on the southern side. The elevation to the western side is traditional brick construction, with painted render at ground level and rendered pebble dash to the upper elevation.

East Street and New Road, both provide two self-contained retail/E Class units. The premises on New Road have fully glazed frontages and conventional shaped units. The retail premises on East Street present differently, with 24 East Street having a "hard frontage" with limited window space and more prominent masonry. 24a East Street, provides a small "kiosk" unit with limited retailing space and concealed entrance, but a fully glazed frontage.

The community hall and ancillary rooms are accessible via a main entrance at 25 East Street and have a two further means of escape at the rear (northern) elevation, and on to New Road. The hall, ancillary rooms and association circulation spaces are of traditional design and construction with painted plastered walls and ceilings. The community hall has a wooden flooring throughout and we understand that it may have previously been used as a dance hall. It is presently a community space of the Church and their congregation".

- 6.19 The report confirms that the building is in a poor state of repair and condition. This is attributed to years of insufficient funding for the church/ income from the property to keep on top of repairs. They identify the following issues: -
- 1. The main pitched roof to the building leaks in several locations and water pools on the first floor.*
 - 2. The ceiling at first floor level has degraded significantly, with large sections of plaster falling away.*
 - 3. The windowpanes and window frames throughout the upper levels are in poor condition. Some panes have fallen out. Temporary measures have been installed to reduce the risk of further panes falling to the ground below. All the windows either need significant repair/ replacement.*
 - 4. The fire escape to New Road is in significant disrepair, with a visible hole in the ceiling and water ingress coming into this section.*
 - 5. The main stairwell at the entrance on 25 East Street requires refurbishment to include repairs to fix the source of any leaks and redecoration. The upper floor of this stair well has significant plaster cracking, damp patches and evidence of leaks".*
- 6.20 At this time, the majority of the existing first floor is unused due to its poor condition (as outlined above). The remainder of the first floor is also in poor condition but used on an ad hoc basis. Two of the ground floor units are let to 3rd parties, whilst the third unit is used as a Parish Office. The property is currently used/ let as follows:

Floor	Unit	Sq ft	Occupier	Rent	Rent/sq ft	Notes
Ground	24-25 East Street	1,414	3 rd party tenant	£9,000	£6.36	
Ground	1 New Road	794	Owner occupied	N/A		Part time use as a Parish office
Ground	1a New Road	956	3 rd party tenant	£6,000	£6.28	
First	Meeting / Music room	685	Owner occupied	N/A		Ad hoc part time use
First	Hall	2,281	Vacant	N/A		Unused in too poor a condition to be used.

Table 1: Taken from Commercial Report, prepared by Flude

- 6.21 The development proposal will result in the 2 No. class E units in New Road and the upper parts of the building, being refurbished and converted to residential accommodation. Together with the provision of much improved church/community hall facilities.
- 6.22 The accompanying report confirms that “*the rents to the 2 units let to 3rd party tenants are small and certainly not sufficient to generate sufficient capital to cover the significant investment required to bring the buildings into good repair and to then cover ongoing maintenance costs*”.
- 6.23 The report notes the decline in traditional high street retail use and considers the commercial property market currently, which it describes as ‘challenging’. When considering the subject properties, they state that “*the ground floor units are small, dated and within a building in a poor and deteriorating state. The New Road units, in particular, are off pitch and visibility obscured behind the protruding fire escape*

staircase to the southern elevation of the building. Aside from these 2 units, the return frontage to La Galleria and a vacant retail at 3 New Road, New Road is a residential road with circa 70 – 100 residential units located on / access from New Road".

- 6.24 Comparable evidence from recent commercial lettings in Shoreham are considered, however it is concluded within the report that the other properties considered are in a better commercial location than the subject property. It is recognised that passing rents to the subject are on the light side, however it notes that: -
- "- To achieve stronger rents would require significant work to return the property to full repair.*
- Demand for the New Road units will remain very limited even if these units were in good condition.*
 - Even if the rents to the subject units were to double to a similar level to that which the comparable properties were let at the income generated would remain well short of what is necessary to fund refurbishment of the building".*
- 6.25 The report draws the following conclusions:
- 1. The subject property is in a poor state of repair. Informal estimates indicate up to £50,000 could be spent to bring the property back to good repair and with appropriate access.*
 - 2. The Church are unable to provide sufficient quantity, quality or accessible community facilities for the activities of the Church.*
 - 3. Income from the units let to 3rd parties is limited and well short of generating sufficient income to fund refurbishment works.*
 - 4. Commercial occupier demand is much reduced due to changes in the retail and office markets and ongoing challenging economic conditions.*
 - 5. The New Road units are off pitch with very limited visibility. Demand for these units is very low and rents achievable similarly low.*

6. *The Church has spent many years considering and pursuing various options for the property. Culminating in the currently agreed plan to work with Empire Group to provide new high quality and accessible community facilities to the ground floor of 24 East Street with this enabled by conversion and refurbishment of the remainder of the building to residential accommodation.*
7. *This proposal being the only option that has been shown to be viable and deliverable subject to planning".*
- 6.26 It is our opinion that the vitality and viability of the town centre, as well as the loss of retail floorspace and the introduction of residential and church/community hall use on the ground floor has been fully considered as part of this planning application and as set out in detail within the accompanying commercial report. There are clear public benefits arising from the scheme, which include bringing the building back into a viable use, providing improved accessibility for a ground floor community use and the introduction of much needed town centre housing. We have clearly demonstrated that retail is no longer a viable use in these particular units, and the proposal would be fully compliant with guidance contained within the NPPF, specifically Paragraph 90, which states that "*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should...(f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites*". The proposal would also be compliant with **Policy 27** of the Adur Local Plan.
- 6.27 The development proposals would result in the loss of a retail use in this location; however it will be noted from a site visit that the New Road frontage is set back and detached from the main commercial area of East Street and in our opinion does not enjoy the footfall or visibility necessary to be a successful location for new retail or commercial space. Further, the loss of a neighbouring bank was accepted at the time

of the adjoining development at 26 and 27 East Street and 3 to 9 New Road (ref: AWDM/1419/23) being considered.

- 6.28 In any case, and as outlined above, the Pottery workshop does not exhibit the signs of being a significant retail use, and indeed we suggest that the sales element of this premises, is actually ancillary to the main studio/workshop use at No.1a. Neighbouring No.1 is a Parish Centre, and benefits from permission to be used as an office. The retail use on East Street comprises an antique type shop. This would be replaced by the repositioned and improved Church Hall, thereby facilitating the retention of an important community function. We also consider that this type of use is appropriate to the town centre and will provide an active frontage onto East Street.
- 6.29 The principal planning use for non-residential elements of this proposals (and as confirmed by the Trustees of the church) is for Use Class F1(f) (Public worship or religious instruction [or in connection with such use]) and F2(b) (Halls or meeting places for the principal use of the local community). In addition, there will be some other ancillary planning uses for this part of the scheme, comprising Use Class E(a) (Display or retail sale of goods, other than hot food), E(b) (Sale of food and drink for consumption (mostly) on the premises), and E(g)(i) (Offices to carry out any operational or administrative functions). Essentially this would allow the church/community uses to take place at the premises, whilst also replacing the existing Parish Centre use at No.1 New Road, and allow associated sale of hot and cold food and drinks to users of the church/community hall.
- 6.30 We are of the opinion that the removal of the existing retail units in this location would be acceptable and the loss would be clearly outweighed by the clear and noteworthy public benefits of the scheme. This Planning Application submission demonstrates that the development proposals are compliant with guidance

contained within the NPPF and the policy requirements of **Policy 27** of the Adur Local Plan.

Character and Heritage Matters

- 6.31 The site is within the defined built-up area boundary for Shoreham-by-Sea. The surrounding area is characterised by residential development. With respect to heritage matters, the Site is located within the Shoreham Conservation Area. There are also a number of Listed Buildings within close proximity of the site, the most notable of which being the Church of St. Mary De Haura, which is Grade I Listed and located to the west side of East Street, north west of the site. The site is also within an area of archaeological interest. The development proposals are seeking some very minor demolition works, as detailed on the plans, which will require conservation area consent.
- 6.32 National planning policy places an emphasis on achieving high quality design and providing beautiful places. **Policy 15** of the Adur Local Plan seeks for new development to be of high architectural quality and to respect the character of the site and the prevailing character of the area. In addition, the NPPF is supportive of good design and making efficient use of land.
- 6.33 **Policy 17** of the Adur Local Plan confirms that "*where a proposed development would lead to substantial harm to, or total loss of a designated heritage asset, this will not be permitted unless there are compelling circumstances*".
- 6.34 This proposal seeks permission for change of use of the property to provide a new church hall and residential units, to include loss of existing ground floor retail. The site relates to St Mary's Church Hall, 25 East Street, & No's 1 and 1a New Road, Shoreham-by-Sea. The proposal follows detailed design advice from the Council at the pre-application stage and a high-quality design solution is proposed as part of this development.

- 6.35 At the pre application stage, the Council stated that “*notwithstanding the policy issue above, the changes to the building appear to be acceptable in principle. There are no concerns with the extent of the proposed demolition as the elements are at the rear and largely not seen from the street. The removal of the staircase projection on the eastern end of the building is a relatively large element though and may have some impact on the adjoining cottage. A suitable replacement boundary wall will be required to be provided.*

The extent of the increased height of the rear dormers is unusual and a reduction would be preferred. The tall, thin entrance doors on to New Road were also considered to be rather ungainly. Fenestration was generally considered to be acceptable with an understanding that timber framed windows would be used. The number of rooflights on the East Street elevation was considered to be excessive however, and their number should be reduced with others relocated to the rear roofslope. All rooflights should be conservation style.

The restoration of the curved arches above the windows in the former antiques shop is encouraged as this will relate pleasingly to the Church opposite”.

- 6.36 With respect to the Planning Officer’s observations (made on the originally presented Pre-Application design) in the order that they appear in the Adur and Worthing letter of 11th July (written Pre-Application Advice), the schemes Architect has provided the following detailed response:

East Boundary Wall - Removal of staircase at Eastern end of building: a brick-built boundary wall replaces this structure.

Rear Dormer Height - Reduction in height of rear dormers “preferred”: We have reduced the height of the rear dormers by 400mm. We will continue to review this feature as the detailed design develops with a view to lowering this feature further.

Thin Entrance Doors - Tall thin entrance doors to New Road “ungainly”: the entrance doors to the houses are now fully integrated into the fenestration design. Framing to the windows is in timber.

East Street Roof lights - Excessive number of roof lights on East Street elevation: the flat at first floor on East Street is no longer duplex and the roof windows on this elevation have been omitted.

Arched Window Heads - Restoration of arches above former antique shop “encouraged”: the first-floor windows to the East Street building are shown with lancet heads based on the partial removal of internal plaster finishes and historic photographs.

Front Railings - Amenity areas in front of houses require “boundary feature”: these external spaces are shown separated from the pavement with railings. These will be painted black.

Bin Stores - Screening of bins within bin store: the front amenity areas are shown with timber bin stores, each able to accommodate two large wheelie bins. The bin stores will have sedum roofs.

Residential Acoustic Separation - Conflict between apartment living spaces and bedrooms of Houses 1 and 5: House 5 and Apartment A have been replanned. An acoustic specialist (Isomass Building Acoustics) has been consulted with regard the wall between Apartment B and House 1; they have confirmed that satisfactory noise separation is achievable.

Room Sizing - Bedroom sizes for House 5 and Apartment A “below standard”; these units have been re-planned.

Density - Density of new residential development: the density of the scheme is a direct product of the sensitive adjustment of the existing buildings to accommodate the change of use.

Community/Residential Acoustic Assessment - Acoustic assessment of noise from community use: a full acoustic survey of existing street noise, conducted over a weekend period, has been undertaken and its performance recommendations for the new double-glazing specification have been adopted. This report is included as part of the submission. An acoustic construction consultancy (Isomass Building Acoustics) have provided specialist advice regarding the floor, ceiling and edge

detailing of the floor separating community and residential uses. Ventilation and cooling strategic schematics are included in the submitted material.

6.37 Great care and consideration has been paid to the proposed external works. The accompanying Design and Access Statement notes considers the East street building proposals, noting that *“the proposals show a partial restoration of the East Street building based on the information currently available; it is likely that the design will develop as investigative works reveal more of the building’s underlying construction. At ground floor, the window and door structural-openings remain largely unchanged. The new fenestration to openings will be double glazed in painted timber framing, configured to suit the new use of this building as a church/community centre. This includes the insertion of openable folding glass doors to the two wider East Street openings.*

At first floor, the proposed elevations show the removal of later renders and pebbledash, the recovery of the original lancet windows and the application of a stucco lime render. In the absence of any evidence concerning the articulation of the original render, this is shown smooth except for a shallow rebate/chamfer around the new window openings. It is currently envisaged that the first floor render will not be painted although this position will be reviewed as the investigative works progress.

The glazing bar configuration for the arched head openings is indicated to a common pattern for the period. It is likely that the acoustic performance necessary for the Change of Use will preclude the specification of openable sash windows but the frames will be configured to replicate their appearance as far as is reasonable. At roof level, the original gable parapets are reinstated to the North and South elevations. The roof covering will be renewed in natural slate”.



Fig 9. Existing North-west Elevation



Fig 10. Proposed North-west Elevation, Showing East Street Façade

- 6.38 The accompanying Design and Access Statement refers to the New Road Elevation, noting that *“the elevations to New Road were completed in 1901. At ground floor, the elevations are largely in red brick with stucco banding and other details. Above this, the base finish to the upper half of the building is pebbledash render with stucco detailing and red brick/stucco bands to the shallow pilasters that mark the structural bays. The stucco detailing is restrained in its articulation. Both the stucco and pebbledash remain in their natural finish and have not been painted.*

The existing single-glazed timber-framed fenestration is in poor condition and appears to have been modified/repaired/overglazed using plastics materials. The windows are to be replaced to the same pattern but double-glazed to meet current Building Regulations requirements and the acoustic performance associated with the Change of Use to residential units.

At ground floor, the original rhythm of the four structural bays is restored in brickwork to closely match the original in surface finish and colour. The glazing bar configuration of the new fenestration is derived from the surviving windows at first floor but incorporating into their design the individual entrance doors of the dwellings.

The window framing is shown finished in a dark green derived from surviving examples from the first half of the 20th Century and which compliments both the red brickwork and the natural finish stucco.

The roof is to be replaced retaining the current ridge and eaves lines. Two conservation roof windows are introduced into the roof towards its Eastern end to provide apartment with additional daylight".

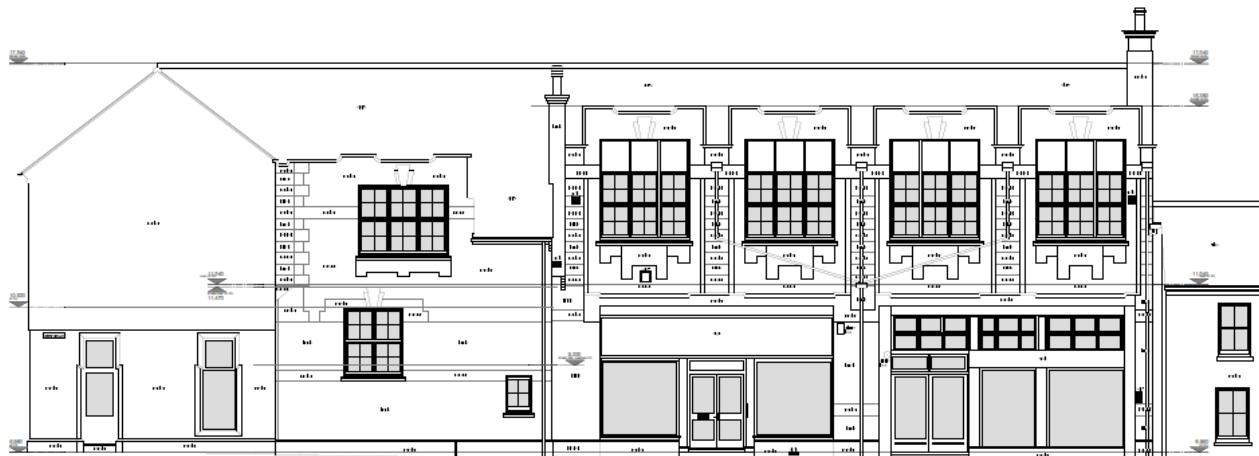


Fig 11. Existing South-west elevation



Fig 12. Proposed South Elevation, Showing New Road Façade

- 6.39 In our opinion the development proposal has been sympathetically designed to respect the character and appearance of the existing buildings, whilst providing modern improvements to make them suitable for residential use. The proposed change of use and associated works will both serve to preserve and enhance the character and appearance of the Conservation Area. It is our view that due to the sensitive manner the works have been proposed, the development will not cause any impact to the significance of the setting of the listed Church opposite or any other heritage asset.
- 6.40 Further, there is a need to ensure that new development provide an efficient use of available land resource. It is our opinion that the provision of 5 x houses and 2 x flats would be wholly appropriate and make an efficient use of the site, which would appear in keeping with the character and appearance of the surrounding area.
- 6.41 In addition, the application is accompanied by a Heritage Report, which has been prepared by Archaeology Southeast and which we would invite the Council to consider in full, when determining this application.

- 6.42 The report confirms that the premises lies within the Shoreham-by-Sea Conservation Area, “*which encompasses the historic core of the town and the River Adur to its south. The conservation area was designated in 1971 and extended in 1993 and 2018. The appraisal document outlines the special interest of the conservation area (Adur District Council 2008)*”.
- 6.43 With regard to Listed Buildings, the statement confirms that “*there are 31 listed buildings within the 1km radius study area of the site, which correspond broadly with the medieval grid pattern of its streets... Of these 31 buildings, ten were assessed during the site visit for their potential to be impacted by the proposed development on account of either intervisibility with the site or holding a significant historical relationship with it... These comprise:*
- *The Church of St Mary de Haura (1).*
 - *Church House, East Street (4).*
 - *The Manor House, 25 Church Street (5).*
 - *24 Church Street (7).*
 - *St Mary’s House, St Mary’s Road (9).*
 - *33-36 East Street (11).*
 - *Cobblestones, St Mary’s Road (12).*
 - *Old Scantlings, Church Street (13).*
 - *Old Swan Cottages, 1 & 2 Church Street (24).*
 - *K6 Telephone Kiosk Adjoining War Memorial (31)”.*

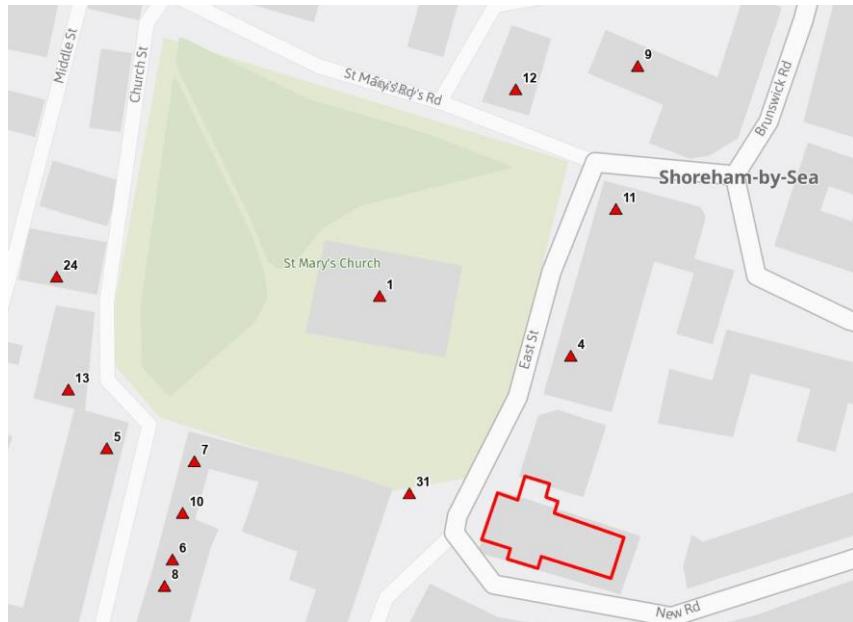


Fig 13. Map taken from Heritage Statement

- 6.44 There is also a single scheduled monument (The Marlipins Museum) within the study area.
- 6.45 The heritage report confirms that *“the proposed development would retain the existing buildings, which are recognised as non-designated heritage assets. It would seek to improve their appearance, which would not only benefit them directly, but given their prominent position within the centre of the historic town, also has the potential to enhance the contribution they make to the conservation area/the settings of other nearby heritage assets...Chief among these improvements would be the reinstatement of pointed arches to the window heads at first floor level of the old school building, plus three pointed arched window openings to the presently blank southern gable end at first floor level. The use of such Gothic detailing was quite common in schools built at this time, reflecting the religious impetus behind the building of National Schools by the Church of England in the 19th century. The proposed reintroduction of these features, which has good precedent, would help to bring elements of its earlier design back to the fore, in the process enlivening the*

western and southern facades; this would pose a positive impact to the conservation area, particularly in closer-range views where the building is a prominent element at the bend in East Street. The windows planned within the southern gable end would also be visible within longer-range views, for example from some locations on the footbridge across the Adur, which although would not be prominent, would add interest and make a slight positive contribution to the general roofscape".

- 6.46 It goes on to note that *"the ground floor openings have been considerably altered during the course of previous building alterations and the current proposals would not substantially alter their present character; the proposals at this level would thus pose a neutral impact. Turning to the alterations planned for the New Road frontage of St Mary's Hall, the proposed replacement of the two mid-20th century shopfronts, which are of limited merit, with multi-pane windows incorporating an entrance door, would return the elevation to something much more akin to its original appearance, which would represent a positive impact. The related enclosure of the small plots at the front of the new dwellings would reinstate a boundary feature upon the original boundary line, which was originally demarcated by similar railings, before being removed during the mid-20th century alterations. This would again enhance the appearance of the street frontage and would be consistent with the generally residential character of the remainder of New Road beyond the site to the east. More generally, in relation to Victorian terraced properties, the conservation character appraisal cites the loss of small front garden plots as damaging. It is therefore deemed the proposed reintroduction of railings enclosing the plot boundaries would have a positive impact to the character of the conservation area, particularly in views eastwards along New Road...With regard to the planned demolition of several 20th century elements at the rear of the building, this area is minimally visible from within the conservation area owing to the density of buildings surrounding the site. These parts of the building make no meaningful contribution to the conservation area, but, generally speaking, neither are they actively detrimental, meaning their removal would pose a neutral impact. The replacement structure within the north-*

west part of the site would be of a similar scale and form to its predecessor and would likewise be minimally visible from outside the site. It is deemed this would pose a neutral impact upon the conservation area. ...The main exception is the eastern elevation of the parts proposed for removal in the north-eastern part of the site, which presents a broad expanse of bland brickwork visible between a gap in the neighbouring buildings in New Road. Owing to a kink in New Road towards its western end, this elevation is only minimally visible as you turn the bend, but is considered a slightly negative element. The removal of these structures would remove part of this wall bringing it back in line with the main part of the north elevation. This would render it better proportioned and would pose a slight positive impact".

- 6.47 It is noted that the refurbishment works and replacement windows and doors on a like-for-like basis to the east street frontage would generally smarten it up. The demarcation of the plot boundary with railings is welcomed and “*the planned works would enhance the appearance of this part of East Street and therefore have a positive impact on the conservation area*”.
- 6.48 All other works are considered to have a neutral impact.
- 6.49 The heritage statement draws the following conclusions: -
- “*· It is considered the proposed development would have a positive/neutral impact upon the heritage significance of the conservation area and the listed Church of St Mary de Haura, which in NPPF terms would equate to enhancement of the heritage assets/no harm.*
 - *The proposed development would have a neutral impact on the significance of the remaining six listed buildings, which, in NPPF terms would equate to no harm.*
 - *The non-designated heritage assets have been considered as part and parcel of the conservation area; the impact of the proposed development upon these would*

*therefore generally be **positive/neutral**, which in NPPF terms would equate to enhancement of the heritage assets/no harm”.*

- 6.50 There would be no harm to the setting of the nearby listed building or surrounding conservation area. Further, there are clear public benefits arising from the proposals including the creation of 5 No. family homes and 2 No. flats within a sustainable location within the settlement boundary, and the creation of an improved church/community centre for the St Mary de Haura Church and Parish Office.
- 6.51 It is our opinion that the building is of sufficient size to comfortably accommodate the level of development indicated, and the resultant low density would be entirely appropriate given the site’s relationship with the adjacent Listed Building and conservation area, allowing ample amenity areas to the proposed properties.
- 6.52 The proposal presented within this application submission would provide an efficient use of the available land resource in a sympathetic form via an appropriate density layout that would not jar with the established pattern of development in the area, and nor would it introduce an obtrusive or visually harmful form of development that would affect the character of the immediate area. The development proposals have been carefully designed to respect the setting of the nearby Listed building and surrounding conservation area. The proposal is considered to accord with guidance contained within the NPPF and **policies 15 and 17** of the Adur Local Plan.
- 6.53 It is considered that the proposed development would represent a high-quality development in this location, which would appear perfectly in keeping with existing housing in this locality, and it would not detract from the character and appearance of the surrounding locality, which is within a conservation area. The proposed development by virtue of its good design and location is considered to have limited impact on the setting of the listed building. Indeed, the heritage report confirms

that any impact will be neutral or positive and as a result there is no harm as a result of the development. Further, the proposal would positively contribute towards the Council's housing supply, providing important social and economic benefits. For these reasons outlined above, it is our view that the proposal is fully compliant with **Policies 15 and 17** of the Adur Local Plan and the relevant sections of the Government's NPPF.

Residential Amenity

- 6.54 It is noted that some concerns regarding residential amenity were raised at the time of the previous Planning Appeal being considered and these comments have informed the design proposals, with great care being paid to window placement, outlook and privacy.
- 6.55 It is our opinion that the change of use the building has been sensitively managed to provide the level of accommodation currently proposed, in a manner that will result in an acceptable relationship between the development and the permitted and existing developments and uses that neighbour the site. Further, at the time of the adjoining development being determined, the case officer acknowledged that "*St Mary's Church Hall abuts the development to the south and is likely to be subject of its own redevelopment proposal in the future. It is not considered that the current proposal precludes or causes harm to any future residential scheme that may come forward on that site*".
- 6.56 Window orientation and placement have been given due consideration, with reference to this high-density town centre location. The proposed bedroom windows to the north elevation are set an acceptable distance away from the rear residential gardens and in our view, this will prevent any undue overlooking towards neighbouring properties. There is ample separation distance between the proposed dwelling and neighbouring properties to all other sides. It is considered that the relationship between the proposal and all neighbouring dwellings would be wholly

acceptable, given the window placement, orientation and distance between the proposal and neighbouring properties.

- 6.57 At the pre application stage, it was agreed that the amenity area in front of the units in New Road will need to be defined by an appropriate boundary feature and that black railings would be the most sympathetic option. The Council also requested the screening of refuse bins. These comments have directly informed the final design proposals. Black railings are proposed to the site frontage, as detailed on the submitted plans. As detailed within the DAS, houses 1-4 *"have associated outdoor spaces to the front and rear, the front areas treated as semi-public and those to the rear as semi-private. The front gardens are hard landscaped, paved predominantly with permeable resin-bonded gravel. Enclosures for refuse bin storage are situated at each party fence wall. These are constructed in treated timber with sedum matting to their roofs. Adjacent to each of these, a pit in the paving provides for the planting of small shrubs"*. House 5 will be treated identically.
- 6.58 With regard to refuse, the front garden timber refuse enclosures have been sized to accept two 240-litre wheeled refuse bins. Householders will have the option of using the planted area next to the refuse store for a 240-litre garden refuse bin.
- 6.59 The proposals have been designed to comply with the criteria contained in the Council's adopted Development Management Standard No.1 "Space Around New Dwellings and Flats" in respect of space between buildings and the provision of outside amenity space.
- 6.60 Taking into consideration all the above, it is our opinion that the proposed development would not have a detrimental effect on the residential amenities of any neighbouring dwellings by way of noise impact, overbearing effect, loss of privacy or loss of light and would be fully compliant with **policy 15** of the Adur Local Plan

and the Council's adopted Development Management Standard No.2 Extensions and Alterations to Dwellings.

Noise Impact

- 6.61 The planning application is accompanied by a Noise Impact Assessment, which has been prepared by Acoustic Southeast.
- 6.62 The report draws the following conclusions: -
- An Acoustic Assessment has been carried out at 24-25 East Street and 1-1a New Road, Shoreham-by-Sea.*
- The Initial ProPG Risk Assessment has been carried out and shows that the site lies comfortably in the "Low Risk" category.*
- Despite this, assessment against BS8233:2014 criteria for internal ambient noise levels for the daytime and night-time periods and ProPG:2017 criterion for Lmax events in bedrooms during the night-time period.*
- Assessment shows that the front façade of the flats and House 5 will need enhanced acoustic glazing and acoustically enhanced ventilation in order to mitigate the noise levels to satisfy the Lmax criterion at night.*
- For the rear façade and the 4 houses at 1 – 1a New Road mitigation is not required – standard thermal double glazing with a typical slot-based trickle vent will be sufficient.*
- All mitigation measures are provided in Section 4 of this report and if adopted, it is recommended that planning consent is not withheld on noise grounds".*
- 6.63 Our client is fully committed to carrying out the suggested mitigation measures, set out within section 4 of the report and would be happy for any permission to be conditioned accordingly. The development proposal would be fully compliant with guidance contained within the NPPF and Adur Local Plan.

Space Standards

- 6.64 The proposal has been designed to be fully compliant with the National Space Standards, with respect to the internal floorspace of the proposed new residential units. It is noted that at the pre application stage, the Council confirmed that the suggested mix of 5 houses and 2 flats would be '*reasonable*'.
- 6.65 The Government's Technical Housing Standards - national described space standards sets out minimum gross internal floor areas and storage. The proposed development would comprise 5 No. three bedroom (5-person occupancy) houses and 2 No. two bedroom flats (one 3-person occupancy/ one 4-person occupancy).
- 6.66 The proposed floor areas are as follows: -
- | | |
|-----------|----------|
| House 01: | 102.4sqm |
| House 02: | 102.5sqm |
| House 03: | 99.5sqm |
| House 04: | 99.4sqm |
| House 05: | 98.2sqm |
| Flat A: | 64.2sqm |
| Flat B: | 104.4sqm |
- 6.67 Each of the three storey, three bedroom (5-person occupancy) houses would meet/ exceed the expected requirements of 99sqm. Flat A (one storey/ two bedroom/ 3 person occupancy) would exceed the requirements of 61 sqm; whilst Flat B (two storey/ two bedroom/ 4 person occupancy) would comfortably exceed the requirements of 79 sqm.
- 6.68 As outlined above, the proposal would be fully compliant with the Government's guidance.

Access & Parking Arrangements

- 6.69 Nil parking provision is proposed as part of the development proposals. Cycle parking provision is provided as part of the development in the form of anchored loops for the locking of bicycles in the front garden of each house. There is space provision for secure, covered bicycle storage in the rear gardens.
- 6.70 The application site is located within a highly sustainable location, being a town centre site, close to public car parks, bus routes and Shoreham-by-Sea railway station. There are a host of facilities and services within easy walking distance of the site, including cafes, restaurants, shops, banking hub, community centre and St. Marys de Haura Church.
- 6.71 At the time of the pre-application enquiry being considered, the Council confirmed that *“the site is in a sustainable location, close to a railway station and bus route, so a car-free development is likely to be acceptable here. Secure and covered cycle storage facilities are required if possible”*.
- 6.72 In addition, it is noted that a shortfall in parking provision was accepted for the adjoining development for *‘partial redevelopment and alterations to include conversion of the former bank premises and flat to form 3no houses; replacement of garage and outbuildings to north of bank with shop and maisonette; partial demolition of 7/9 New Road with first floor extension to form a one bed flat, retaining ground floor commercial premises and shopfront; alterations and rear extension of 3 New Road to form a 3-bedroom house with garden’* at 26 and 27 East Street and 3 to 9 New Road (ref: AWDM/1419/23).
- 6.73 At this time, the Council noted that *“whilst on-street parking is limited in the area, there are comprehensive parking restrictions in place on the nearby roads prohibiting vehicles from parking in places that would be a detriment to highway safety. The LHA does not anticipate that the shortfall in parking provision would*

result in a detrimental highway safety impact, but the LPA are advised to consider the potential impacts on on-street parking from an amenity point of view. Weight is given to the fact the site is situated in a sustainable location whereby residents need not rely on a private car...". Further, at this time, WSCC Highways reiterated that the site is sustainable, noting that "the site is situated in a sustainable location in Shoreham-By-Sea, within walking/cycle distance of local services and amenities. Cycling is a viable option in the area. The site is also well connected by public transport, with regular bus services available from the nearby A259. Shoreham-By-Sea Railway Station is located approximately 400m north of the site".

- 6.74 It is considered that nil parking provision would be acceptable in this town centre location. Our client would be happy for the cycle parking provision to be secure via a suitably worded condition. The proposal would be compliant with guidance contained within the NPPF and **Policy 28** of the Adur Local Plan.

Ecology

- 6.75 The Application is accompanied by a Bat Scoping Report and Preliminary Ecological Appraisal, which has been prepared by The Ecology Partnership.
- 6.76 The report states that the site is located within a heavily urbanised environment, within a town centre. The key findings of the report are as follows: -
"The buildings were assessed as having negligible sustainability to support roosting bats. Habitat within the zone of influence of the proposals and habitat fringing the site is considered to be of low potential value to bats for foraging purposes. The flat roof areas of the building have the potential to support nesting gull species".
- 6.77 With regard to nesting gulls, the report confirms that *"there is the potential that the flat roof areas could be used by nesting gulls. However much of the external fabric of the buildings will remain unchanged by the proposed works. However, if an active nest is identified, a minimum exclusion zone for all works within 5m radius of the*

nest must be established to protect it from disturbance until the young have fledged".

- 6.78 No further ecological survey works is recommended for this site.
- 6.79 Our client is committed to complying with the suggested mitigation regarding nesting gulls and would be happy for these to be ensured via a suitably worded condition. The proposals would be compliant with guidance contained within the NPPF and **Policy 31** of Adur Local Plan.

Biodiversity Net Gain (BNG)

- 6.80 No BNG is required in this case as the proposed development would meet the following standards: -
"A development that does not impact a priority habitat and impacts less than: 25 square metres (5m by 5m) of on-site habitat 5 metres of on-site linear habitats such as hedgerows".

Flood Risk and Drainage

- 6.81 The Planning Application is accompanied by a Flood Risk Assessment, which has been prepared by gta Civils and Transport. The site lies within Flood Zone 1, which means that it has a low probability of flooding from rivers and the sea. The report confirms that *"the sites flood risk profile is Low. No mitigation is needed or proposed".*
- 6.82 With regard to surface water, *"the surface water from the roof and external area to the north of the building will be routed to the existing outfall close to the NW corner. This is known to run to the combined sewer ...None of the drainage upstream of the outfall will be used as it is in too poor condition".*

- 6.83 They go on to note that *“Flow drainage calculations for both existing and proposed scenarios (the 100 years plus 45% CC’ storm event) are shown in Appendix E. FEH22 hydrological data and Cv values of 1.0 have been used. The proposed runoff rate and volume shall be reduced compared to existing, due to the reduced contributing area once the gardens are made permeable”*.
- 6.84 The report concludes that *“this development will not increase the flood risk, either on the site or to neighbouring properties, and so complies fully with the 2025 NPPF and current PPG”*. At the local level, the proposal would be fully compliant with **Policy 36** (Water Quality and Protection Flood Risk and Sustainable Drainage of the Arun Local Plan).

Archaeology

- 6.85 An Archaeological Desk-based assessment has been prepared by Archaeology South-East in support of this Planning Application. In terms of the impact of the proposed development, the report states that *“given the character of the re-development, i.e. the conversion of existing buildings, impacts are most likely to be limited in scale. Comparison of the existing and proposed ground plans (Appendices 1 and 2) indicate that there will only be localised groundworks for new walling, most of which is likely to be shallow internal studs. It is possible that where external walling is to be extended, there could be a possible impact should this require deeper foundations (see extract of proposed ground plan below, with the areas of possible deeper footings circled in red). Areas of thicker walling to be inserted along the southern façade are unlikely to cause further impact as they lie within the existing wall line which will already be disturbed to some depth (circled in green). Foul drainage is likely to run parallel to the existing foul sewer under the north-western part of the building, with little or no additional impact, but a surface water sewer may run through the yard just north of, and parallel to, the existing north wall which has the potential to reach undisturbed deposits depending on depth”*.

6.86 The assessment concludes that:

- *The Site has some hypothetical potential for deposits of geoarchaeological interest to be present – Head deposits;*
- *The presence/absence or thickness of such deposits is undetermined;*
- *The Site has a hypothetical potential for archaeological remains to be present;*
- *These are most likely to relate to the medieval and post-medieval periods, and may include structural evidence for earlier buildings.*
- *Previous impacts which may have impacted on geoarchaeological/archaeological remains have been identified. These arise from the previous and existing development of the Site;*
- *The extents of and degree of the truncation is undetermined at the present time.*
- *Made ground of a varying thickness is assumed to be present.*
- *Archaeological remains are likely to be buried below the made ground;*
- *The development works which extend below the made ground are likely to impact upon surviving archaeological deposits within the Site;*
- *These are likely to be of a limited scale and impact.*

6.87 The proposal would be fully compliant with the guidance contained within the NPPF and **policy 17** (The Historic Environment) of the Adur Local Plan, where the Council will “ensure where possible the preservation of archaeological features against damaging or discordant development”.

Sustainable Construction & Energy Efficiency

6.88 **Policies 18** (Sustainable Design) and **19** (Decentralised Energy, Standalone Energy Schemes and Renewable Energy) of the Arun Local Plan seek sustainable and energy efficient development and this is supported by the Council’s recent SPD on energy. We are aware that the Council has also adopted a Planning and Climate Change Checklist which encourages a minimum 31% reduction in carbon emissions for all new build housing.

- 6.89 An Energy Report has been submitted with this Planning Application, which confirms that *“the heating of the dwellings has not been finalised due to final decisions pertaining to incoming utility connections. The developer wishes to retain some flexibility on whether the dwellings shall use natural gas or electricity as the primary energy source... Two assessments have been undertaken. One assessment using air source heat pumps, with electricity as the primary energy source, and a second assessment utilising natural gas boilers, together with heat pump hot water systems to provide sufficient low carbon technology to comply with planning and building regulatory requirements”*.
- 6.90 The report concludes that *“both options illustrate the site’s predicted emission reduction is greater than the 10% stated in Policy 18 of the Local Plan”*. The proposals would be compliant with guidance contained within the NPPF and **policies 18 and 19** of the Adur Local Plan. Our client would be happy for the development to be conditioned in line with the advice contained within the accompanying Energy Report.

Affordable Housing

- 6.91 **Policy 21** of the Adur Local Plan states that *“Affordable Housing On development sites of 11 dwellings or more (gross) a target of 30% affordable housing, including social rented, affordable rented and intermediate housing will be sought”*.
- 6.92 As only 7 units are to be provided as part of the development proposals, no affordable housing is required. This point was confirmed at the pre application stage.

7. SUSTAINABLE DEVELOPMENT SUMMARY

7.1 As outlined above, the focus of the revised NPPF continues to be for development to be sustainable. It sets out there are three principle 'objectives' to achieving sustainable development: economic, social and environmental. In this part of the Planning Statement the main factors that inform the judgement as to whether the proposal would be a sustainable form of development are summarised. In reaching that view all matters referred to in the above report have been considered.

The Economic Objective

7.2 The proposed development would result in the creation of construction jobs during the build period. The additional population could help generate more local spending in the local community, provision of infrastructure and services, and generate New Homes Bonus funding as well as additional Council Tax receipts. The proposal also includes a church/community centre for the St Mary de Haura Church and Parish Office. These are all material considerations that weigh in favour of the development. It is considered that the proposal would satisfy the economic role of sustainable development.

Social Objective

7.3 The provision of 5 No. Family dwellings and 2 No. flats will make a notable contribution to the district's housing supply. The NPPF seeks to promote "*strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*". Due to the location of the site within the built-up area of Shoreham-by-Sea town centre where there are many facilities and services, it is considered that the location of the site is highly sustainable.

7.4 Further, the proposal would include the addition of a church/community centre for the St Mary de Haura Church and Parish Office. This is a notable benefit to the

community. Overall, it is considered that the proposal would be satisfactory from a social perspective.

Environmental Objective

- 7.5 There is an overriding need to ensure that development should contribute to protecting and enhancing the natural, built and historic environment. The proposed development in terms of layout, scale and appearance would serve to both conserve and enhance the character and appearance of the surrounding area, which is within the Shoreham-by-Sea Conservation Area. We have demonstrated that the proposed development by virtue of its high quality and well thought out design would result in no harm to the setting of the listed Church of St. Mary de Haura and in fact in some instances would have a positive impact. There are no flood risk, biodiversity or landscape constraints that relate to this site. No parking provision is proposed and due to the highly sustainable nature of the site, the proposal would not result in any highway safety problems. As such, the environmental role of sustainable development would be satisfied by this proposal.

8.0 CONCLUSIONS

- 8.1 This development proposal is seeking planning permission for the proposed change of use of the existing premises to provide a new church hall and residential units, to include loss of existing ground floor retail.
- 8.2 This previously developed site is located within the defined built-up area boundary for Shoreham by Sea, where the principle of new development is accepted. The site is also within Shoreham Conservation Area, with a number of Listed Buildings within close proximity of the site. It is within a Primary Shopping Area, an area of archaeological interest and is close to an Air Quality Management Area.
- 8.3 We are aware that the Council do not currently have a 5YHLS supply. Given the absence of a 5YHLS, Paragraph 11(d) of the NPPF is engaged. Therefore, the shortfall in the supply of housing land in Adur and the engagement of para 11(d) are significant material considerations, which weigh heavily in favour of approving the proposed housing development at this Site.
- 8.4 Following detailed discussions with the Council we are confident that the revised scheme would result in the sensitive conversion of the building to accommodate a modest sized development of 5 No. houses and 2 No. flats, which would respect the established character of the locality in terms of quantum, pattern and spatial layout of development. An important element of the proposal is the provision of an enhanced and re-positioned new church/community centre for the St Mary de Haura Church and Parish Office, which would be located at ground floor fronting onto East Street.
- 8.5 The proposed works and alterations have been sympathetically designed to respect the character and appearance of the existing buildings, whilst providing modern improvements to make them suitable for residential use. The proposed change of

use and associated works will both serve to preserve and enhance the character and appearance of the Conservation Area. It is our view that due to the sensitive manner in which the works have been proposed, the development will not harm the setting of the listed Church opposite.

- 8.6 The vitality and viability of the town centre, as well as the loss of retail floorspace and the introduction of residential and church/community hall use on the ground floor has been fully considered as part of this planning application and as set out in detail within the accompanying commercial report. There are clear benefits from the scheme, which include bringing the building back into a viable use, providing improved accessibility for a ground floor community use and the introduction of much needed town centre housing. We have clearly demonstrated that retail is no longer a viable use in these units, and the proposal would be fully compliant with guidance contained within the NPPF, specifically Paragraph 90, which states that *“Planning policies should... (f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”*. The proposal would also be compliant with **Policy 27** of the Adur Local Plan.
- 8.7 In respect of the NPPF we are firmly of the opinion that this eminently developable site provides an opportunity to provide a new residential development that will accord with each of the social, economic and environmental objectives of the sustainable development test, whilst also boosting the supply of housing, by providing a net increase of new dwellings. To conclude, it is our view that the proposals would represent a high-quality form of development in this town centre location, and that no harm would be resultant in respect of the visual character of the area or any neighbouring resident.
- 8.8 The proposal meets all the necessary policy requirements and will cause no significant harm to the character of the surrounding area. In our opinion the

overwhelming weight of evidence supports the proposal as it is shown to comply with all relevant Development Plan policies.

- 8.9 The proposed redevelopment optimises the potential of the site to accommodate development as required by the NPPF, whilst respecting the character of the conservation area and taking due account of the setting of the neighbouring heritage asset. It is strongly considered that the proposed development constitutes a sustainable form of development that accords with the Development Plan for the area and should therefore be approved without delay.
- 8.10 Given the above, it therefore follows that planning permission should be granted without delay.

January 2026