

**24-25 EAST STREET AND 1-1A NEW ROAD,
SHOREHAM-BY-SEA, WEST SUSSEX**

HERITAGE ASSESSMENT (SETTING)

(NGR: 521656 105073)



**Commissioned by:
W Group**

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SUMMARY

This heritage statement has been undertaken by ASE in relation to the proposed residential development at 24-25 East Street and 1-1a New Road. It considers the significance of relevant heritage assets and the potential effects of the proposed development upon their setting, in line with the requirements of the NPPF. It should be read in conjunction with an archaeological desk-based assessment which has also been prepared (ASE 2025), which contains a fuller description of the archaeological and historical background of the site.

This study has identified one conservation area, seven listed buildings and several non-designated heritage assets, that either have an important historical component to their heritage significance or are directly intervisible with the site. The impact of the proposed scheme upon the setting of these heritage assets has been considered, as has the resultant impact upon their heritage significance.

The results of this assessment can be summarised as follows:

- *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.*

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1.0 INTRODUCTION

- 1.1 Archaeology South-East (a division of the UCL Institute of Archaeology) has been commissioned by W Group to carry out a heritage assessment in relation to the proposed redevelopment of 24-25 East Street and 1-1a New Street, Shoreham-by-Sea, West Sussex (site centred NGR: 521656 105073; Figures 1-3).
- 1.2 The focus of this report is to assess the impact of the proposed development on the heritage significance of nearby built heritage assets. An archaeological desk-based assessment for the site is presented as a separate report (ASE 2025); this contains a fuller description of the archaeological and historical background to the site, from which information relevant to this assessment has been reproduced.
- 1.3 This report outlines the statutory designations relevant to the assessment, offers brief descriptions and statements as to the significance of the relevant heritage assets, assesses the contribution of setting to the significance of those heritage assets, and then assesses how the setting of the relevant heritage assets may be affected by the proposed development.
- 1.4 This heritage statement has been compiled in line with the policies set out in the National Planning Policy Framework (revised December 2024). The Government's aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. To achieve this, the Government's objectives for planning for the historic environment are to conserve England's heritage assets in a manner appropriate to their significance by ensuring that decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset.
- 1.5 Reference is also made to *Conservation Principles: For the Sustainable Management of the Historic Environment* Consultation Draft (Historic England 2017a), *The Setting of Heritage Assets* (Historic England 2017b) and *Managing Significance in Decision-Taking in the Historic Environment* (Historic England 2015) which are the standard guidance documents for such assessments.
- 1.6 The site was visited by Amy Williamson in September 2025, in order to assess the proposed development site and potentially affected heritage assets. Data on designated and non-designated heritage assets was acquired from Historic England (National Heritage List), West Sussex County Council, Adur District Council, and other databases and resources cited in the text.

2.0 THE SITE

- 2.1 The site is located at the corner of East Street and New Road in Shoreham-by-Sea (also known as New Shoreham). It lies to the east of the parish church of St Mary de Haura within the historic core of the town and port of 'New Shoreham', established towards the end of the 11th century. The main street pattern is one based on the medieval grid pattern running off the High Street, with East Street being one of these. New Road is a later addition, which developed in the late 18th/early 19th century.

- 2.2 The site consists of a developed plot, almost entirely occupied by a building whose component parts date to the 19th and early 20th century, which was formerly known as St Mary's Hall.

3.0 HISTORICAL BACKGROUND

- 3.1 The following historical background to the site is drawn from the archaeological desk-based assessment (ASE 2025).
- 3.2 The parishes of Old and New Shoreham were originally a single parish. The origin of the name *Shoreham* has not been firmly established but it is generally considered most likely that the first element derives from an Old English word meaning slope, in this instance relating to the Downs, and the second element derives from Old English *ham* (settlement).
- 3.3 Old Shoreham, situated to the north of the site (outside the study area) was established in the pre-conquest (1066) period, and its existence suggested by the inclusion of the tithes of Shoreham in the grant by William de Braose in c. 1073 to support a college of secular canons at Bramber castle.¹ Whilst the origins of the settlement are unclear it is likely that in the Late Saxon period it was an agricultural village with access to the river as a minor port. Throughout the medieval period Old Shoreham continued as an agrarian village which was separate from 'New Shoreham' (Shoreham-by-Sea).
- 3.4 New Shoreham was founded at the mouth of the River Adur shortly after the Norman Conquest to replace the port at Old Shoreham further upstream and may perhaps be related to a rivalry between William de Braose and Fécamp Abbey. Various disputes meant that Fécamp Abbey had prevented de Braose from carving out a parish at Bramber and are likely to have driven William, or his son Philip, to found New Shoreham on an unchallenged site in preference to further development of Bramber (Harris 2009). The first documentary reference to New Shoreham is in 1151, and by 1235 the settlement is known as *Noua Sorham*, and by 1288 as *Nywe Shorham* (Mawer and Stenton 1929-30, 246-7). At the time of its founding the river is likely to have formed a broad tidal estuary, c.1 ½ miles wide, but perhaps afforded some protection by a shingle bar.²
- 3.5 From documentary sources, it appears that the medieval port enjoyed great prosperity through the 12th century, although it seems to have gone into decline in the 13th or 14th century. It is possible that the decline was purely economic, the result of a French or Spanish raid, due to silting of the harbour entrance, or more likely a combination of factors. It is noted that in 1348 the eastern part of the town was being washed away by the sea, a large part of the town was apparently ruinous by 1368 and it has also been suggested that the sea destroyed the southern part of the port in 1401.³
- 3.6 Much of the grid-pattern layout of the streets of the Norman planned town has survived although this may represent only part of the original layout and its original

¹ Harris, R. 2009, *Shoreham. Historic Character Assessment Report*

² <https://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp138-149> Accessed September 2025

³ <https://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp138-149#h3-s2> Accessed September 2025

form is much debated. Nonetheless East Street, which has also been known as 'Oriental Street',⁴ almost certainly lay within the extents of the medieval town.

- 3.7 Whilst the identification of the High Street as the medieval high street is debated it was certainly an important street, and by the 17th century the only major street.⁵ While of declining importance as a port it did continue to be an important shipbuilding centre through to the 19th century.⁶ This also included ancillary industries such as rope and sailmaking.
- 3.8 From the 18th century onwards, Shoreham benefitted from improved communications in the form of turnpiked roads and the introduction of the railway from Shoreham to Brighton (1840). Unlike the neighbouring towns of Brighton and Worthing, New Shoreham did not develop as a seaside resort, though some lodging houses were built along New Road, which had been formally established by the 1820s (Figure 7). The harbour was revived and improved, but its main focus shifted to the east and in 1887 new harbour commissioners offices were built at Southwick. Ship and boatbuilding continued and there was an increase in fishery activities, particularly oysters. The railway, in particular, saw an immediate burst of expansion of the town population, but a slight dip in the late 19th century before growth resumed. This was typically around and north of the railway. By the 1960s the towns of Shoreham-by-Sea, Kingston, Southwick, Portslade, Hove and Brighton had merged to form an almost continuous developed area along the coastal plain.

The site

- 3.9 In the late 18th century, the site lay within the parsonage croft which was held by the Reverend William Marchant (Figure 6). The various Diocesan Surveys undertaken in the late 17th and early 18th centuries indicate that the parsonage croft was formerly occupied by the parsonage house, which by 1668 had become ruinous and by 1724 had gone entirely (ibid.). Parsonage croft then remained undeveloped until the early 19th century when New Road was established through the centre of it and a school was built to the north side at the junction with East Street; this is the building which occupies the western portion of the site (Figure 2: 33).
- 3.10 A 'National School' had been established by 1818, in the first instance running in the south transept of the parish church.⁷ In 1829 the then vicar, the Reverend Zacharias Henry Biddulph, initiated the construction of a dedicated school building, funded by subscription. The first stone was laid by the Revd. Biddulph in August 1831,⁸ and it had been completed by 1833, when it was described as a 'neat building beside the churchyard in East Street'.⁹ It had on its books 115 children each paying 2d. a week. The boys' and girls' National day and Sunday schools and the infants' day and Sunday school recorded in 1847 as in New and Old Shoreham, for a total of 204 children, were all thought to be in New Shoreham. The school building is first

⁴ <https://www.shorehambysea.com/wp-content/uploads/2018/02/9.-1782-Survey-Map-with-place-names-added-in-1949.jpg> Accessed September 2025

⁵ <https://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp138-149#h3-s2> Accessed September 2025

⁶ Harris, R. 2009, *Shoreham. Historic Character Assessment Report*

⁷ Schools established by the (Anglican) National Society for Promoting Religious Education which, along with the (nonconformist) British Schools provided the first near universal elementary education for poorer children in England

⁸ <https://www.britishnewspaperarchive.co.uk/viewer/bl/0001945/18310814/032/0007> Accessed September 2025

⁹ <https://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp172-173> Accessed September 2025

represented on Saunders' map of 1844, but by 1872, there were two buildings on the site, suggesting the enlargement of the school in the intervening period – perhaps separate boys and girls schools (Figures 8 & 9).

- 3.11 As part of the educational reforms resulting from the Elementary Education Act of 1870 a school board was formed for the parish in 1872, taking over the National School buildings.¹⁰ The board replaced them with a new school opened in 1875 in Ham Road for an estimated attendance of 240.
- 3.12 In 1865 the parish adopted the Local Government Act, 1858, and formed a local board of health. They first convened in 1866 in the Dolphin Chambers but in 1875 moved to the school buildings on East Street which had been vacated by the National School. There are some discrepancies in the secondary sources as to which became the 'Town Hall' used by the board of health. On the basis of the 1875 Ordnance Survey map it is most likely to have been that shown on the east of the site (Figure 2: **35**; Figure 10). The use of annotations relating to both the National School and Town Hall on the 1875 map could suggest at least part of the school was not taken over.
- 3.13 In 1890 the Board of Health took a lease of the customhouse in the High Street which then became the town hall and was bought in 1911. Following the move, the building on East Street was referred to as 'Old Town Hall' (**35**). There were various appeals for funds in relation to the freehold of the Old Town Hall to create a new St Mary's Hall; it having been decided that the conversion of the Old Town Hall had proved impractical.¹¹ Correspondence includes letters from the architect, A.W. Nye, M.S.A., of Brighton.
- 3.14 St Mary's Hall (**34**) was constructed on the east part of the site and is attached to the remaining National School building (**33**). It comprised a large assembly room on the first floor and a further hall on the ground floor, and provided for graded departmental Sunday Schools, with rooms set aside for meetings and other parochial functions; until the opening of the Community Centre in 1965 it served as the main public hall for Shoreham. The new hall was officially opened on 19th July 1912 by the Bishop of Chichester with the celebrations including the dedication of the building which took place in the upper hall, followed by a tea in the lower hall.¹² A photograph surviving from the occasion shows the New Road frontage, including the format of the ground floor windows before the present shop fronts were inserted, and also part of the adjoining National School building, with evidence for pointed arches to the window/door openings (see below). Another, undated early 20th century photograph shows the ground floor hall before its present subdivision into shop units.
- 3.15 In 1933, a mortgage was approved for the conversion of the whole ground floor to accommodate commercial premises. Since then, the building has had a variety of uses, with the hall on the first floor of the new building, complete with stage, providing a space for entertainments, and the upper room of the old school building serving as an ante-room. The ground floor, in addition to various commercial enterprises, has accommodated parish offices and, until the mid-20th century, the public library.

¹⁰ <https://www.british-history.ac.uk/vch/sussex/vol6/pt1/pp172-173> Accessed September 2025

¹¹ Par 170/10/1, Par 170/10/2 (West Sussex Archives)

¹² <https://www.britishnewspaperarchive.co.uk/viewer/bl/0000618/19120720/089/0004> Accessed September 2025

- 3.16 The extant former school building (**33**) is a simple two storey structure with a pitched roof, aligned north – south. It is of somewhat unusual proportions with the upper floor being taller than the ground floor, which is accentuated by the present render. The upper floor currently has small window openings but these were originally taller with pointed ‘Gothic’ arches, which would have given the building an ecclesiastical feel, consistent with its origins as a Church of England National School. Evidence is provided by an early photograph of the building, which shows the same to have been true for the ground floor openings and also the outlines of three pointed arches at first floor level within the southern gable end; investigation works to the interior wall faces at first floor level have also succeeded in tracing them.¹³ At each floor level the original layout is likely to have been predominantly open-plan.
- 3.17 St Mary’s Hall, adjoining to the east, is also of two storeys, built in red brick with pebble-dash and mock stone detailing, and prominent multi-pane windows. Designed by the architect A.W. Nye, it represents a mix of Art Deco and a classical stylings. The main block of the building is rectangular in plan, constructed over six structural bays, of which the western two at ground floor level now form part of the western shop, while the four to the east are subdivided into the two shops which front onto New Road. Originally, both the upper and lower floor were open-plan, as indicated by an early photograph of the building.¹⁴ A projecting block to the front houses a stairwell, as does one to the rear, which partly wraps around northern end of the old school building. Attached to the latter are rooms which house WC facilities etc. Existing plans and elevations are provided as Appendix 1.



View of the site, looking south-east. The 19th century school building is on the right; to the left is part of the early 20th century St Mary’s Hall extension



The west elevation of the old school building

¹³ Photo supplied by the client

¹⁴ Photo supplied by the client





Rear of the building, looking east



The ground floor of St Mary's Hall prior to its subdivision in the mid-20th century

4.0 PROPOSED DEVELOPMENT

- 4.1 The development proposals are currently in the detailed design stage but essentially comprise the conversion of the existing buildings to provide a community space at ground floor level across much of the western half of the site, with the remainder of the ground floor and upper floor converted to residential use. The proposed development would involve limited demolition of 20th century elements at the rear of the building and their partial replacement with a more suitable structure within the north-west corner of the site, behind a retained façade. Details of the existing building and proposed development are included here as Appendices 1 & 2.

5.0 PLANNING BACKGROUND

5.1 National Planning Policy Framework

- 5.1.1 Government policies relating to planning are given in the National Planning Policy Framework (revised December 2024).¹⁵ Section 16 (paragraphs 202 – 221) of the Framework (*Conserving and enhancing the historic environment*) outlines policies relating to the historic environment and the key role it plays in the Government's definition of sustainable development, the principle which underpins the document.
- 5.1.2 The Framework requires that local planning authorities should set out in their Local Plan 'a positive strategy for the conservation and enjoyment of the historic environment', recognising that 'heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance' (Section 16, paragraph 202). The NPPF is supported by historic environment Planning Practice

¹⁵ <https://www.gov.uk/guidance/national-planning-policy-framework>

Guidance, published in April 2014, and updated in July 2019.¹⁶ In specific relation to historic environment issues, further guidance is provided by Historic Environment Good Practice Advice notes and Historic England Advice Notes, issued by Historic England and the Historic Environment Forum.¹⁷

- 5.1.3 The Framework requires that planning applicants should ‘*describe the significance of any heritage assets affected*’ by their application, ‘*including any contribution made by their setting*’ (see below, Section 5).

5.2 Local Planning Policy

- 5.2.1 On 14th December 2017 Adur District Council adopted the Adur Local Plan¹⁸ which, with the exception of land within the South Downs National Park, sets out the strategic development and land-use priorities for Adur (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within the area will be made. The following policy within that document pertain to heritage assets, including both built heritage assets and those of archaeological interest. Those elements of most relevance to this assessment are underlined

Policy 17: The Historic Environment

For All Heritage Assets:

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.⁵ Development should not adversely affect the setting of a Listed Building, Conservation Area, archaeological feature or Scheduled Ancient Monument [Scheduled Monument]

Listed Buildings:

Planning permission and/or Listed Building consent will only be granted for internal or external alterations, changes of use or extensions to a Listed Building provided that the internal or external appearance or historic character of the building is not adversely affected. The reinstatement or replication of original features such as windows or doors will be supported. In the case of extensions and alterations, materials used must be consistent with those originally used or typical of the locality. Changes of use may be considered which might normally be resisted on other grounds (subject to local access and environmental considerations) in order to secure the retention of a building of historic or architectural interest. New development which would adversely affect the setting of a Listed Building, in terms of design or materials, will not be permitted

Conservation Areas:

Development in Conservation Areas will be required to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of that area. Advertisements in Conservation Areas should respect the character, proportions and design of the building on which it is displayed, and use traditional materials where necessary. Where an application for planning permission or

¹⁶ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

¹⁷ <http://historicengland.org.uk/advice/planning/planning-system/>

¹⁸ <https://www.adur-worthing.gov.uk/adur-local-plan/> Accessed August 2025

Conservation Area consent is submitted for the alteration, change of use, extension or repair of a building or feature in a Conservation Area, the retention of original features or, where this is not possible, their reinstatement with appropriate materials and the removal of unsympathetic features will be sought.

Conservation Area Character Appraisals will be used to assess applications within designated Conservation Areas and opportunities will be taken through new development and other measures to preserve and enhance these areas, and to implement the recommendations of the Conservation Area Management Plans. The importance to the local area of key non-listed buildings within Conservation Areas will be a material consideration in assessing an application for their demolition or development.

Where in compelling circumstances the Council is minded to grant consent for demolition of a building in a Conservation Area, this shall not be granted until detailed plans for redevelopment have been approved. Consent will be subject to a condition preventing demolition until a contract for the approved redevelopment scheme has been awarded.

Archaeological Features:

The Council will ensure where possible the preservation of archaeological features against damaging or discordant development. Such features should only be removed or altered in compelling circumstances where there is no practical alternative and where provision can be made for recording. Where a site includes, or potentially includes heritage assets of archaeological interest, an appropriate desk-based assessment will be required [i.e. this assessment] and a field evaluation where necessary.

5.3 Site Planning Background

5.3.1 A past application in 2009 was submitted for:

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). ADC/0023/09 and ADC/0023/10

5.3.2 This was refused and a subsequent appeal dismissed, principally in relation to issues of living conditions and pressure on infrastructure. As far as can be ascertained from publicly accessible documents no objections were raised on heritage grounds.

5.4 Conclusion

5.4.1 This heritage statement engages with the above policies by assessing the heritage assets on/near the proposed development site and the contribution that their setting makes to their significance, and then by assessing how the setting of these heritage assets may be affected by the proposed development.

6.0 METHODOLOGY

- 6.1 The *National Planning Policy Framework* (Section 16: 'Conserving and Enhancing the Historic Environment') requires that the significance and setting of a historic building should be considered as part of the planning process:

207. 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.

208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

- 6.2 It also states the following of relevance to this assessment of impact:

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

- 6.3 This assessment report considers the potential impacts arising from the proposed development in relation to designated heritage assets and their setting. Setting is defined by the *NPPF* as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

- 6.4 Setting is important due to the contribution it makes to the significance of heritage assets. This assessment therefore follows the staged approach set out in the relevant Historic England guidance (2015; 2017b):

Step 1: Identify which heritage assets and their settings are affected by the proposed development.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm.

Step 5: Make and document the decision and monitor outcomes.

- 6.5 The emphasis of this report is on the first three steps of this methodology. Each aspect of these steps is considered within the sections below.

7.0 IDENTIFYING THE HERITAGE ASSETS

- 7.1 Heritage assets comprise a site, building, place, area or landscape of heritage interest and thus include buildings, archaeological sites and landscape features such as ancient woodland and hedgerows. Designated heritage assets are designated by statute, while non-designated heritage assets can be locally listed by the local planning authority and/or listed on county historic environment record databases, although this is not a definitive record of potential heritage assets. Further examples may exist in an unrecognised or unrecorded form and absence from the HER database does not reduce or negate the significance of any potential heritage asset. This document is concerned with built heritage assets, whether designated or non-designated. An archaeological desk-based assessment for the site is presented as a separate report (ASE 2025); this contains a fuller description of the archaeological and historical background to the site, although information relevant to this assessment has been reproduced here. For ease of cross-reference, the heritage asset numbers assigned in the desk-based assessment are adopted in this report.
- 7.2 For the purposes of this assessment, heritage assets within a 500m radius study area around the site have been considered; their locations are plotted on Figure 1. A site visit was conducted to determine whether or not a line of sight was present between each individual asset and the proposed development site, whether or not they had visually significant attributes, such as designed views or vistas, as well as consider their relationship with the surrounding landscape more broadly. The results of this initial assessment are summarised below and presented in Table 1.
- 7.3 Information on the affected heritage assets is drawn from the Historic Environment Record (HER) held by West Sussex County Council. Data relating to listed buildings was also acquired from the National Heritage List for England, whereas information relating to conservation areas and locally listed buildings was obtained from Adur District Council.

Conservation Area

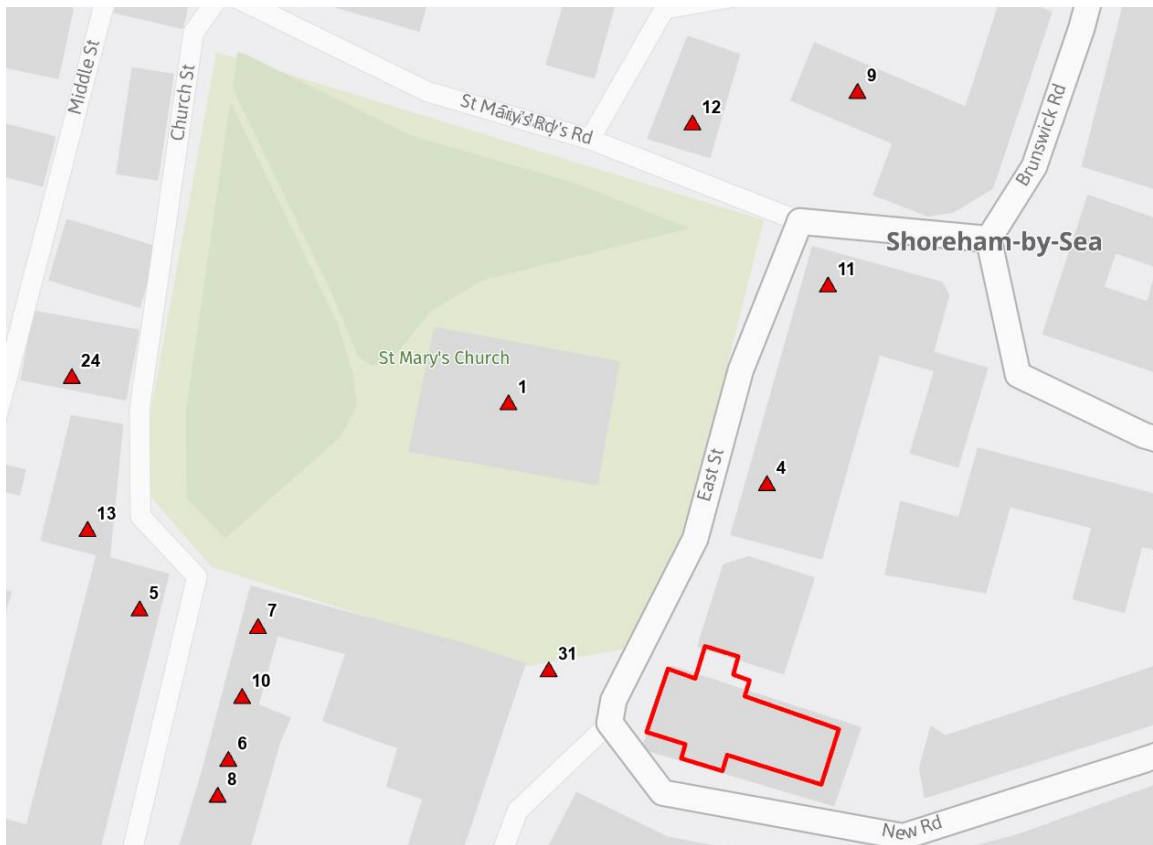
- 7.4 The site lies within the Shoreham-by-Sea Conservation Area, which encompasses the historic core of the town and the River Adur to its south.¹⁹ The conservation area was designated in 1971 and extended in 1993 and 2018. The appraisal document outlines the special interest of the conservation area (Adur District Council 2008).

¹⁹ Adur District Council, 2008, Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy <https://www.adur-worthing.gov.uk/media/Media,99434,smxx.pdf> Accessed August 2025

Listed Buildings

7.5 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. These are tabulated in the accompanying archaeological desk-based assessment for the site (ASE 2025) and represented on Figure 1 (with a detailed extract below). 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; the results are summarised in Table 1. 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**).



Other Designated Heritage Assets

- 7.6 Within the study area there is a single scheduled monument, The Marlipins Museum (Figure 1: **2**), which encompasses the plot around the Grade II* listed building on the site.
- 7.7 There are no examples of the following within the 1km study area:
- Registered parks and gardens.
 - Registered battlefields.
 - Protected wreck sites.

Non-Designated Heritage Assets

‘Locally Listed’ Buildings

- 7.8 The conservation area appraisal notes that:

*In addition to listed buildings, the conservation area contains a large number of unlisted buildings that make a positive contribution to the character or appearance of the conservation area.*²⁰

And that

*Those identified as ‘positive buildings’ are not afforded the same protection as listed buildings but their importance to the local area would be a material consideration in considering an application for demolition or redevelopment.*²¹

- 7.9 Its notes that these ‘positive buildings’ include:

Nos. 24-25 East Street (St Mary’s Church Hall)

*Comprises a former town hall building built in 1829 and a recently redundant church hall.[sic] Located on a prominent corner location opposite the Church of St Mary de Haura, its interest derives from its scale and treatment of the corner rather than any outstanding architectural qualities.*²²

And that

Demolition of this building will only be acceptable if it is demonstrated that the proposed replacement/s are able to exhibit the same or greater qualities as the existing building does on this prominent corner site.

- 7.10 On the basis of the above, the buildings on the site (**33** and **34**) are considered to be heritage assets, and a material consideration in planning terms, but are not designated heritage assets. The latter replaced the Old Town Hall (**35**) mentioned in the conservation area appraisal (see 3.12 above).
- 7.11 Other ‘positive buildings’ in the vicinity of the site include:

²⁰ Ibid

²¹ Ibid

²² Ibid

- 3 New Road (neighbouring the site).
- 7-9 New Road.
- 10-18 East Street.
- 19-21 East Street (opposite the site).
- 22 East Street (opposite the site).
- Ferry Inn, East Street.
- War memorial (opposite the site; **63**).
- 27-29 Church Street.
- The Vicarage, Church Street.
- Westover, Church Street.

7.12 In the assessment below, these are considered more broadly as part of the general make-up of the conservation area.

Table 1 – Heritage assets identified within the study area

Heritage asset	HER No./National Heritage List no.	NGR (easting)	NGR (northing)	Type (grade)	Description	Intervisible with the site?	Significant historical relationship with site?	Potential impact by proposed development?
Shoreham-by-Sea Conservation Area	-	-	-	Conservation area	Encompasses the historic core of Shoreham-by-Sea and the bordering stretch of the River Adur to the south	Y	Y	Y
1 Church of St Mary de Haura	1192780	521623	116602	Listed building (I)	Parish church dating to c. 1130, 1170-1230 and later. Nave was ruined in the C17th and pulled down in the early C18th	Y	Y	Y
4 Church House, 29 East Street	1027864	521667	105113	Listed building (II)	Early/mid-C18th dwelling	Y	N	Y
5 The Manor House, 25 Church Street	1027899	521561	105092	Listed building (II)	Mid-C18th century dwelling, with early/mid-C19th wing to left, possibly earlier origins. In the last two decades of the C18th lived in by Revd. William Marchant ²³	N	N	N
7 24 Church Street	1027902	521581	105089	Listed building (II)	Mid-C18th dwelling. St Saviour's School (now Ardingly College) was	N	N	N

²³ <https://historicengland.org.uk/listing/the-list/list-entry/1027899?section=comments-and-photos> Accessed September 2025

Heritage asset	HER No./National Heritage List no.	NGR (easting)	NGR (northing)	Type (grade)	Description	Intervisible with the site?	Significant historical relationship with site?	Potential impact by proposed development?
					founded here in 1858 by Nathaniel Woodard, Curate of St Mary de Haura – school moved to Ardingly in 1870			
9 St Mary's House, St Mary's Road	1286313	521683	105180	Listed building (II)	Early/mid-C18th dwelling extended with lower RH wing in C19th. Lancing College, the first school of the Society of St Mary and St Nicholas was founded here in 1848, also by Nathaniel Woodard	Y	N	Y
11 33-36 East Street	1353756	521678	105147	Listed building (II)	Late C18th dwelling, now with C20th shop-fronts at ground floor level	N	N	N
12 Cobblestones, St Mary's Road	1353761	521655	105174	Listed building (II)	C18th dwelling, altered in C19th	Y	N	Y
13 Old Scantlings, Church Street	1286456	521552	105105	Listed building (II)	Mid-C18th dwelling	Y	N	Y
24 Old Swan Cottages,	1027900	521549	105131	Listed building (II)	Mid-C18th dwelling with C19th extension to left	Y	N	Y

Heritage asset	HER No./National Heritage List no.	NGR (easting)	NGR (northing)	Type (grade)	Description	Intervisible with the site?	Significant historical relationship with site?	Potential impact by proposed development?
1 & 2 Church Street								
31 K6 Telephone Kiosk Adjoining War Memorial	1232426	521630	105082	Listed building (II)	Type K6 telephone kiosk, designed 1935 by Sir Giles Gilbert Scott	Y	N	Y
2 The Marlipins Museum, High Street	1353757	521494	105024	Scheduled monument & listed building (II*)	C12th store, with C14th and later alterations, now museum	N	N	N

Summary

- 7.13 The proposed development site is occupied by two non-designated heritage assets – the early 19th century National School Building (**33**) and the early 20th century church hall (**34**), both historically associated with the parish church of St Mary de Haura, close-by to the west.
- 7.14 One conservation area and seven statutorily listed buildings have been identified as having a historical or visual relationship with the proposed development site and will be afforded further consideration. The identified non-designated heritage assets, including those upon the site, will be considered more broadly as part of the general make-up of the conservation area.
- 7.15 The remaining heritage assets, hold no known meaningful historical relationship with the site, nor is there any intervisibility with the site, and so have been precluded from further assessment.

8.0 THE SIGNIFICANCE OF THE HERITAGE ASSETS AND THE CONTRIBUTION MADE BY THEIR SETTING

8.1 In order to consider the potential impact of the proposed development on the significance of the identified heritage assets, this assessment will firstly provide a brief significance statement for each heritage asset and determine to what degree their setting makes a contribution to that significance. This is assessed by examination of a range of sources, such as a site visit, listed building information, cartographic evidence and professional judgement. The assessment is based on observations made from within the site and from public viewpoints only; the results are summarised in the table below.

8.2 The foregoing discussion of the assets' significance and setting utilises NPPF terminology and supporting guidance (NPPF Planning Practice Guidance;²⁴ Historic England 2017a; Historic England 2017b; Historic England 2019). The NPPF identifies the following categories of heritage interest: archaeological, architectural and artistic, and historic, which are defined as follows in the Planning Practice Guidance:

- *Archaeological interest: ... there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*
- *Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

8.3 Within each of these categories of heritage value, the following degrees of significance are adopted here:

- **Exceptional:** elements of the place that are of key national or international significance, being among the best or only surviving examples of an important type of monument, or being outstanding representatives of important social or cultural phenomena.
- **High:** elements that constitute good and representative examples of an important class of monument (or the only example locally), or that have a particular significance through association (although surviving examples may be relatively common on a national scale), or that make major contributions to the overall significance of the site.

²⁴ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

- **Moderate**: elements that have obvious intrinsic value, or make a discernible contribution to the character and understanding of the site. They may provide a historical or cultural context for features of individually greater significance.
- **Low**: elements that have a limited degree of intrinsic value, or make some contribution to understanding or appreciation of the site.
- **Neutral**: elements that have no intrinsic value, without being actively intrusive.
- **Negative**: elements that are actively detrimental to the significance of the site, or which detract from its character, setting or comprehension. Recommendations may be made on their removal or on other methods of mitigation.

Setting

- 8.4 Closely allied to a site's heritage values is the contribution its landscape setting makes to its significance, and how it is experienced within the context of its wider surroundings. Whilst this is predominantly a visual consideration, it is also influenced by environmental factors such as noise and smell, as well as by a deeper understanding of the historic relationship between places, even where there is no line-of-sight between them (Historic England 2017b).

Conservation Area

Shoreham-by-Sea Conservation Area

- 8.5 The Shoreham-by-Sea Conservation Area encompasses the core of the historic town and the section of the River Adur which borders it to the south. It is divided into six smaller character areas which are described by the conservation area appraisal document. The western portion of the site falls within the 'Church Precinct' character area and borders the 'Shopping Areas' on its south side; the eastern portion of the site falls within the 'Residential Areas within the Historic Core'.
- 8.6 The general character of the Church Precinct area is noted as being of 'close-knit commercial and residential development centred on the Grade I listed church, public open space, trees'; the Residential Areas are noted as being of 'close-knit residential development, historic terraces and cottages, narrow streets, few vehicles, significant use of flint', while the Shopping Areas are characterised as 'busy commercial area, significant traffic and on-street parking, mix of building styles and scales'.
- 8.7 The appraisal document identifies the following key elements as positive features of the conservation area:
- Church of St Mary de Haura and its setting.
 - Riverside setting.
 - Retention of original medieval street pattern.
 - Flint walls and sympathetic use of materials in general.
 - Shopping areas vital and alive with a mix of uses.
 - Historic cottages and houses.
 - Well maintained terraced groups of dwellings.
 - Use of colour to add interest.

- Retention of front gardens on some Victorian terraced houses.
- Narrow side lanes add interest and character.
- Western entrance into conservation area.
- Quiet ambience on side streets contrasting with the busier commercial areas.
- Central public open space based on the church.
- Development of Ropetackle site improves the western edge of the conservation area.
- Use of street furniture to enhance area e.g. the shopping areas.
- Trees e.g. the Churchyard.
- Riverfront open space on Coronation Green.
- Tidy public realm with little evidence of litter, graffiti, vandalism etc.

- 8.8 In terms of the setting of the conservation area, the appraisal document identifies two key locations for viewing the town in its setting: Shoreham Beach, on the opposite side of the High Street and River Adur, and from the Norfolk Bridge to the west, these being important for being able to appreciate the town as a compact riverside development, with evidence for its nautical context, and generally being able to appreciate its mass, scale and townscape setting, against the backdrop of the South Downs. Views from the downland to the north, are also identified as important.
- 8.9 The significance of the conservation area rests primarily in its *moderate – high* historic interest as an example of a compact riverside town, which retains substantial elements of its medieval street pattern and a good assemblage of ostensibly post-medieval buildings. Accordingly, its characterful streets and buildings are of *moderate – high* architectural interest, with the parish church being a key focal point at the core of the historic settlement. The conservation area also holds *moderate* archaeological interest in relation to the potential for future research to yield more information about the early origins of the town, not only through archaeological investigation, but also through detailed study of its upstanding buildings.
- 8.10 Occupying a low-lying position on the coastal plain, with the South Downs rising gently to the north, and the River Adur, with its modern port located to the south / south-east and Shoreham Beach beyond to the south, the landscape surrounding the conservation area forms the principal element of its setting. Throughout its history there would have been a strong functional relationship between the two, particularly with the harbour, which would have formed the basis of the local economy, an element which is perpetuated in the industrial character of the modern port to the east of the town. As noted above, this close relationship can be appreciated from various locations, but best from the south, in views across the Adur from Shoreham Beach, where the Downs are also visible in the background. From within the conservation area, glimpsed views outwards of the of the river and Downs help to reinforce this relationship.
- 8.11 The general sprawl of later development, in particular to the north and east, which now effectively joins Shoreham to Southwick/Hove/Brighton somewhat obscures its identity as a small historic settlement, while the current volume of traffic along the High Street (A259, main coastal route) now translates as a *negative* element of its setting. Overall however, setting is considered to make a *moderate* contribution to the heritage significance of the conservation area.



General view of the conservation area, looking south-west towards the church from the north end of East Street



Looking eastwards from within the churchyard towards the site



Looking north from the High Street, up East Street



Looking south down East Street



Showing the narrow character of Church Street where it borders the churchyard, looking south



Looking north-east along New Road, the site is just outside the shot on the left-hand side



Looking north across the Adur from Shoreham Beach, note the glimpsed downland views beyond



Closer view of the town, looking north across the Adur



Looking south towards the Adur from the south end of East Street



Looking south from the junction of New Road and Tarmount Lane, the masts giving a sense of the nearby river

Listed Buildings

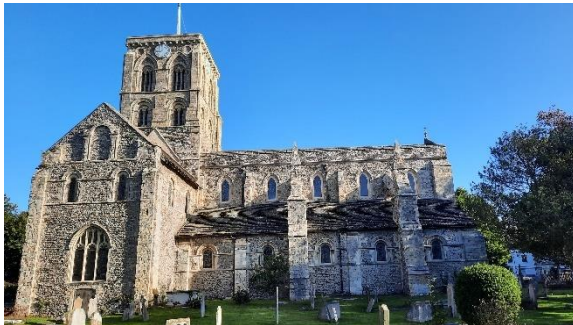
2. Church of St Mary de Haura

- 8.12 The church of St Mary de Haura originated c. 1130 and is thought to have been completed by the late 12th/early 13th century.²⁵ Throughout the medieval period it was one of the largest and most important parish churches in Sussex, testament to the prosperity of the port during that period. By the late 17th century the nave had fallen into disrepair and in the 18th century it had been removed altogether, aside from fragments of the former structure which remain standing within the churchyard. Despite 14th and 15th century alterations, primarily to the windows, and chiefly then further alterations in the 19th century, the upstanding fabric of the church relates to the early phases of construction.
- 8.13 The church holds *high* historical and architectural value as an example of a sizeable Norman church, which, excepting the nave, substantially survives from that time. The church also holds *high* archaeological interest for the potential to learn more about its earlier stages of development, particularly in terms of the below-ground archaeological interest of the ruined nave.
- 8.14 The church occupies slightly higher ground at the centre of the town's historic core. This, together with its imposing form, makes it a key focal point of the town. Having served as the spiritual focal point of its community for much of the past millennium, means that its heritage interest also encompasses *moderate* communal value, relating to its historic and ongoing role in town life.
- 8.15 The key elements of the setting of the church are its prominent position, both spatially and symbolically at the historic core of the town, its associated churchyard, and its relationship with the surrounding settlement and river, including buildings such as the former vicarage (9), school (the site) and alms house (12), with which it would have been functionally linked. Within the town, its prominent position is best appreciated looking northwards along East Street, but other, more restricted views are available when approaching from the surrounding streets. Longer-range views from the south, including from Norfolk Bridge, and particularly from Shoreham Beach, allow the church, with its prominent tower to be appreciated as the dominant feature, rising

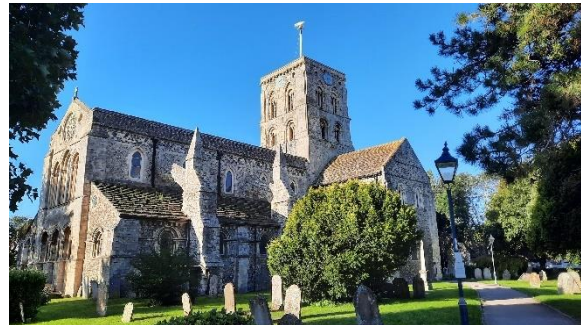
²⁵ <https://sussexparishchurches.org/church/shoreham-st-mary-de-haura-new-shoreham/> Accessed September 2025

above the roofscape of the town. Looking south from the church along East Street, provides glimpsed views of the river, a reminder of the importance of the port to the town's historical development. Within the churchyard, the upstanding remnants of the former nave and numerous grave markers, reinforce the sense of the history of the site, while its open character, with criss-crossing paths, is well-used as a means of circulation between the more tight-knit surrounding streets and as a place to sit, emphasising its central position within the town.

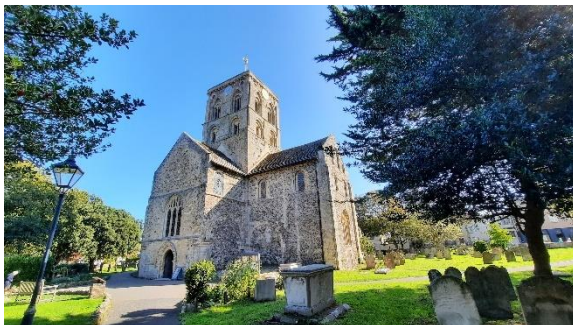
- 8.16 Overall, setting is considered to make a *moderate* contribution to the heritage significance of the church.



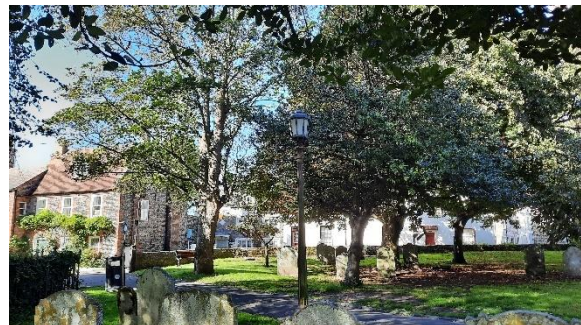
View of the church, looking north



View of the church, looking south-west



View looking north-east



View of the churchyard, looking south-west

4. Church House

- 8.17 Known as Lowdells in the 1782 survey, Church House originated as a dwelling, apparently in the early/mid-18th century. It is now occupied by a dental practice. The building generally holds *moderate* historical and architectural interest as an example of a dwelling of that era, though modern signage relating to the dental surgery and unfinished remedial work relating to the removal of its porch, to the front, have diminished the aesthetic value of its principal elevation, as have large and unsympathetic modern additions to the rear elevation.
- 8.18 Beyond its historic plot at the rear (now diminished by the later additions) the principal element of its setting is its frontage onto East Street and its outlook toward the church and churchyard, which lie directly opposite and provide a good sense of the position of the house at the very core of the historic town. These make a *moderate* contribution to its significance.



View of the street frontage, looking southwards down East Street; the site is just visible at the far end



Looking north from the rear of the site; the rear of Church House is indicated

9. St Mary's House & 12. Cobblestones

- 8.19 These two neighbouring properties on the north side of St Mary's Road are both dwellings which are ostensibly of 18th century date. Cobblestones remains a private dwelling, while St Mary's House, like Church House, is now the premises of a dental practice. In 1782 Cobblestones was identified as Alms House, whereas a blue plaque on the exterior of St Mary's House, notes that the first school of the Society of St Mary and St Nicholas was founded here in 1848 by Nathaniel Woodard (one of many schools founded by him), the then curate of the church. Through the late 19th and early 20th century St Mary's House served as the vicarage.
- 8.20 Although of quite different character – St Mary's House being of a more formal classical design and Cobblestones, more vernacular in style with later, 19th century additions, both properties hold *moderate* historical and architectural interest as examples of post-medieval dwellings. As with Church House, the main element of each of their settings is the church, which their principal, south elevations, overlook. The formal composition of St Mary's House is best appreciated looking north from the top of East Street, where it stands as a prominent feature at the end of the road (this position also provides it with long-range glimpses of the river), whereas Cobblestones, which is of lower proportions, is less conspicuous, being partly hidden by its enclosing flint boundary walls. The car park occupying the former front garden of St Mary's House, with its expanse of hardstanding is a slight *negative* element, as is the modern housing development which encircles Cobblestones to the west and north and which occupies part of its historic plot. However, the proximity to the churchyard reinforces the sense of their position at the core of the historic town as well as the former functional links held as the vicarage and alms house, and as such, setting may be considered to make a *moderate* contribution to their significance.



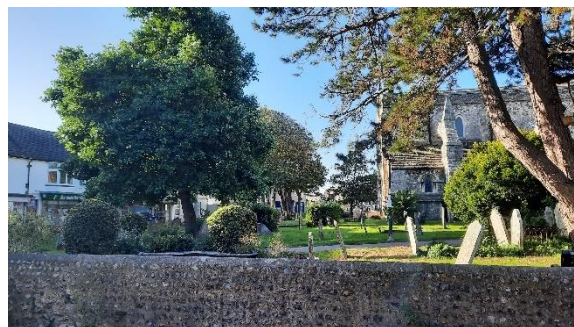
General view of Cobblestones (left) and St Mary's House, looking north west



St Mary's House, looking north



Cobblestones, looking north-west



Looking southwards through the churchyard from Cobblestones towards the site

13. Old Scantlings & 24. Old Swan Cottages

- 8.21 Old Scantlings and Old Swan Cottages both lie on the west side of Church Street, which borders the western edge of the churchyard. Both dwellings date to at least the 18th century and are identified on the 1782 map. They both hold *moderate* historical interest as examples of vernacular dwellings and *moderate* architectural interest, with Old Scantlings having neatly knapped flint to its principal elevation and Old Swan Cottages, which lies end-on to Church Street (its principal elevation faces south onto a twitten linking with Middle Street), being of flint cobbles and having a distinctive Mansard roof profile.
- 8.22 Like the other properties bordering the churchyard, aside from their historic plot boundaries, the principal aspect of each of their setting is their relationship with Church Street and the twitten and their outlook eastwards over the churchyard, which reinforces the sense of them being at the very heart of the historic town.



Looking west along Church Street, Old Scantlings is on the left



Looking southwards down Church Street, Old Swan Cottages is at the centre of the shot



Looking eastwards from Old Scantlings towards the site (indicated)



Looking eastwards from Old Swan Cottages towards the site (indicated)

31. K6 Telephone Kiosk Adjoining War Memorial

- 8.23 The telephone kiosk is located at the north end of the pedestrianised part of East Street, adjacent to the churchyard, war memorial and 19-21 East Street. It is a Type K6, which was designed by Sir Giles Gilbert Scott in 1935 and has been present on East Street since at least 1952.
- 8.24 Its easily recognisable, bold, red-painted cast iron design holds *moderate* historic and architectural interest as an iconic piece of street furniture, illustrative of the rapid development of telephone communication infrastructure in the mid-20th century. Its setting is defined by its position at a prominent point within the town centre, close to the church and war memorial and at the confluence of several main paths/routes, which would have been key to its original siting.



The telephone kiosk, looking north



The position of the kiosk on East Street

Table 2 – The contribution of setting to the significance of affected heritage assets

Heritage asset	Grade	Simplified significance	Key aspects of significance	Key aspects of setting	Contribution of setting to heritage significance
Shoreham-by-Sea Conservation Area	-	Moderate - high	Medieval and post-medieval riverside town, which retains elements of its medieval street pattern and good assemblage of post-medieval buildings	Relationship to the surrounding landscape, in particular the river/port, with views in and out being of importance to the appreciation of this.	Moderate
1 Church of St Mary de Haura	I	High	Good example of a Norman church. Dominant physical and symbolic presence in town life.	- Prominent position at the heart of the town, with its tower visible within the surrounding landscape - Relationship with the surrounding settlement and river/port, the latter being instrumental in terms of its development/scale	Moderate
4 Church House, 29 East Street	II	Moderate	Example of an 18 th century dwelling	Relationship with East Street and position bordering churchyard	Moderate
9 St Mary's House, St Mary's Road	II	Moderate	Example of a relatively high status 18 th century dwelling Association with Nathaniel Woodard	- Relationship with St Mary's Road and position bordering churchyard - Historic functional relationship with the church	Moderate
12 Cobblestones, St Mary's Road	II	Moderate	Example of an 18 th century vernacular dwelling	- Relationship with St Mary's Road and position bordering churchyard - Historic functional relationship with the church	Moderate
13 Old Scantlings, Church Street	II	Moderate	Example of an 18 th century vernacular dwelling	Relationship with Church Street and position bordering churchyard	Moderate

Heritage asset	Grade	Simplified significance	Key aspects of significance	Key aspects of setting	Contribution of setting to heritage significance
24 Old Swan Cottages, 1 & 2 Church Street	II	Moderate	Example of an 18 th century vernacular dwelling	Relationship with Church Street/twitten and position bordering churchyard	Moderate
31 K6 Telephone Kiosk Adjoining War Memorial	II	Moderate	Iconic piece of street furniture/communication infrastructure Association with Sir Giles Gilbert Scott	Prominent position within the town	Moderate

9.0 THE IMPACT OF THE PROPOSED DEVELOPMENT

9.1 The assessment above indicates that eight heritage assets identified in the vicinity of the site either have an important historical relationship to the site or are directly intervisible with the site. This means that they have the *potential* to be affected by the proposed development, even where they cannot be seen from the proposed development site. Equally, a proposed development can be fully visible from an asset, but its impact will be minimal if the setting does not contribute to the significance of that asset (Historic England 2015; 2017b). This section aims to establish the extent of any such impact: its results are summarised below in Table 3.

9.2 The NPPF states that impact should be assessed in the following manner:

212. 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.

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

214. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

215. 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.

9.3 In considering the impact of a proposal upon a non-designated heritage asset, the NPPF states:

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

9.4 Similarly, in relation to curtilage structures, Historic England guidance (2015) notes that:

Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (ie the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance.

9.5 The NPPF divides impact as resulting in either *substantial harm* or *less than substantial harm*. In practice, the majority of proposals fall under the latter category, meaning a more nuanced assessment is required to come to a fully rounded decision. The following informal terminology is therefore adopted here:

- A *High* impact equates to the category of 'substantial harm' set out by the NPPF. The Planning Practice Guidance for the Historic Environment states that the bar for justifying this level of harm is also high.
- A *Moderate* impact equates to the category of 'less than substantial harm' set out by the NPPF, but falls within the upper end of that category. The requirement to weigh the proposal against public benefit and the optimum viable use of a site applies, but may need more rigorous justification.
- A *Low* impact also equates to the category of 'less than substantial harm' set out by the NPPF, but falls within the lower end of that category. The requirement to weigh the proposal against public benefit and the optimum viable use of a site still applies, but the justification may be more straightforward.
- A *Neutral* impact equates to no potential harm, meaning that the requirement to weigh the proposal against public benefit and the optimum viable use of a site may not apply, although heritage aspects of the proposal may still be a consideration.
- A *Positive* impact is one which is considered to enhance the significance and/or setting of a heritage asset. Identified positive impacts to heritage assets may have public benefit and are likely to be beneficial to the proposal as a whole.

LEVEL OF IMPACT	NPPF EQUIVALENT
<i>High</i>	substantial harm/total loss
<i>Moderate</i>	less than substantial harm
<i>Low</i>	less than substantial harm
<i>Neutral</i>	no potential harm
<i>Positive</i>	enhancement of a heritage asset; possible public benefit

9.6 It should be stressed that the following discussion is the considered view of the author based upon the findings of the survey. The assessment is offered based upon

knowledge and experience of other such heritage assets and any suggestions offered are intended as advice. Many of the views which inform the conservation of heritage assets are to some extent subjective – and thus it should be stressed that there is no guarantee that the opinions expressed below will be endorsed by the local planning authority.

Proposed development

9.7 The proposed development would entail the conversion of the existing buildings, to provide a new community space at ground floor level, with the remainder being altered to form five self-contained houses and two flats. This would involve the following alterations which may have an impact to the heritage assets being considered:

- Alterations to the windows and doors/reinstatement of windows to the 19th century former National School building (new community space).
- The alteration of the windows/ground floor shopfronts to the New Road frontage of St Mary's Hall (new dwellings) and the reinstatement of a low boundary wall with railings defining the plot boundary.
- The demolition of discreet 20th century elements at the rear of the building, including the northern stairwell and W.C.s and their partial replacement, the western façade onto East Street would be retained as part of one of the new dwellings. The introduction of similar railings to define the plot boundary.
- The introduction of a full-width dormer to the rear roof slope of St Mary's Hall to accommodate the insertion of a mezzanine floor and related alterations to the windows of the rear elevation.

Conservation Area

Shoreham-by-Sea Conservation Area

9.8 Shoreham-by-Sea Conservation Area is considered a characterful example of a compact riverside town, whose moderate to high heritage significance rests chiefly in the surviving elements of its medieval street pattern and its good assemblage of historic buildings. Its setting – primarily its relationship with the river and harbour, but also the downland to the north – is considered to make a moderate contribution to this.

9.9 The proposed development site contains buildings which have been identified in the conservation area appraisal document as making a positive contribution to the conservation area, though this document notes:

*...its interest derives from its scale and treatment of the corner rather than any outstanding architectural qualities.*²⁶

9.10 The Shoreham Renaissance Strategy produced in 2006 identified the site as a potential location for redevelopment.²⁷ The appeal decision issued in relation an earlier scheme, was far from complimentary about the buildings, stating the following:

²⁶ Adur District Council, 2008, Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy https://www.adur-worthing.gov.uk/media/Media_99434.smxx.pdf Accessed August 2025

²⁷ Ibid.

... this 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 emphasises the ungainly mass of the church hall. The principal 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. I agree with the appellant that this crudely detailed building lacks architectural merit and detracts from the character and appearance of the CA. The disused nature of much of the building also harms the character of the area.²⁸

- 9.11 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.
- 9.12 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.



General view of the site showing its prominent position at the intersection of East Street and New Road



Looking north from the footbridge, showing the present blank expanse of render to the south elevation of the old school building (indicated)

²⁸ Appeal Decision in relation to APP/Y3805/E/10/2121277 and APP/Y3805/A/10/2121275

- 9.13 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.
- 9.14 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.
- 9.15 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.
- 9.16 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.



View looking north-east from the rear of the site



Looking west at the end elevation of the building visible upon turning the bend in New Road

- 9.17 The East Street frontage, which presently sits well between the neighbouring structures, would be retained as the western façade of the replacement structure, but refurbished, to generally smarten it up and enhance the contribution it makes to its surroundings. It is understood replacement windows and doors would be of like-for-like style; an existing plain doorway to the rear yard would be infilled. In a similar manner to the New Road frontage, the existing plot boundary would be demarcated by railings. It is considered the planned works would enhance the appearance of this part of East Street and therefore have a *positive* impact on the conservation area.
- 9.18 The planned alterations to the lower level of the north elevation of St Mary's Hall would not be visible from outside the site, so would have a *neutral* impact on the conservation area. The planned introduction of a full-width dormer to the rear roof slope and the associated modification of the windows would be partly visible in longer-range views looking south from Brunswick Road, and from the side when approaching the site travelling westwards down New Road, as well as in far-reaching views across the Adur from Shoreham Beach. The existing large upper windows would become slightly taller, but the existing character of the building would be maintained and the overall roof height would remain the same.
- 9.19 Views of the site looking southwards down Brunswick Road are sufficiently distant and broken by intervening buildings that the proposed dormer would not pose a negative impact on this part of the conservation area; the impact would therefore be *neutral*.



View southwards down Brunswick Road, the site is highlighted



View northwards from Shoreham Beach, the location of the proposed dormer is indicated

- 9.20 As noted above, owing to the kink in New Road towards its western end, it is only once past the bend that the dormer would become visible, at which point attention is drawn to the more interesting assemblage of buildings clustered around the pedestrianised part of East Street. The end of the dormer would be visible above the roof slope but would not be conspicuous; this would pose a *neutral* impact elevation. This same part of the building would also be visible in longer-range views from Shoreham Beach. Here too, the proposed dormer would present as an inconspicuous part of the broader roofscape and would have a *neutral* impact

Listed Buildings

2. Church of St Mary de Haura

- 9.21 The church holds high historical and architectural interest as an example of a sizeable Norman church. Its setting is considered to make a moderate contribution to this – the key elements being its intentional siting on slightly higher ground, which, with its tower makes it a prominent focal point both within the town and in longer-range views from outside the conservation area; also important are its churchyard, its relationship with the river and its relationship with several nearby buildings. The key elements of its setting that require consideration in relation to the proposals are twofold: its position as a prominent focal point within the town and its relationship with the former school building on the site, with which it would have been functionally related.
- 9.22 In relation to the first point, it has already been discussed above that although the proposed development would not result in an increase in the overall roof-height of the building, the dormer added to the rear roof slope would be visible in longer-range views, notably those looking northwards from Shoreham Beach towards the town, in which the church is a prominent feature. As noted above, given the scale of the dormer and the distance, it would form an unobtrusive element of the broader roofscape and would not in any way compete with the church. The impact would therefore be *neutral*.
- 9.23 In terms of its relationship with the former school building on the site, none of the planned alterations would negatively impact this. However, the planned reinstatement of pointed-arched windows to the upper levels of the west and south elevations would serve to return the building a little closer to its original Gothic Revival style. Although it would still not be readily legible as a former school building, conceptually it would help to reinforce its former link with the church, which would be appreciable both in close-range views from East Street, the churchyard and parts of Church Street and New Road, but also in longer range views, particularly from the footbridge over the Adur, where the southern gable end is visible in proximity to the eastern end of the church. This would have a slight *positive* impact upon the setting of the church.



Showing the intervisibility between the church and the site



Looking north from the footbridge, showing the present blank expanse of render to the south elevation of the old school building (indicated)

4. Church House

- 9.24 Church House holds moderate significance as an example of an 18th century dwelling. Its setting makes a moderate contribution to this, relying largely on its relationship

with East Street and its outlook towards the church; its historic plot has been diminished by unsympathetic additions at the rear.

- 9.25 At the front, the proposed development would only be visible externally in very oblique views and it would not impact its relationship with East Street or its outlook towards the church. The rear of the proposed development would be visible in relatively oblique views from the rear of the property, but it would not affect any key elements of its setting; the impact would thus be *neutral*.

9. St Mary's House & 12. Cobblestones

- 9.26 St Mary's House and Cobblestones are both of moderate heritage significance as examples of 18th century dwellings. Their settings are considered to make a moderate contribution to this – the key element being their relationship with the church and in relation to St Mary's House, its prominent position at the north end of East Street.
- 9.27 Oblique views of the western end of the site are possible looking south down East Street from St Mary's House, while similar, albeit broken views are possible through the churchyard from Cobblestones. The proposed development would not affect the important elements of their settings and would therefore pose a *neutral* impact upon each.

13. Old Scantlings & 24. Old Swan Cottages

- 9.28 Old Scantlings and Old Swan Cottages on the western side of Church Street hold moderate significance as examples of 18th century dwellings. Their settings make a moderate contribution to this, namely their relationship with Church Street and the twitten and their outlook eastwards over the churchyard.
- 9.29 From each of the properties, broken views of the site are visible through the churchyard. The proposed development would not affect the important aspects of their settings and would therefore have a *neutral* impact.

31. K6 Telephone Kiosk Adjoining War Memorial

- 9.30 The telephone kiosk is of moderate significance as an iconic piece of street furniture, with its setting, defined by its prominent position within the town centre, making a moderate contribution. Although the kiosk is situated immediately opposite the site, the proposed development would not alter the ability to appreciate its prominent position and would thus pose a *neutral* impact.

Table 3 – The Impact of the Proposed Development

Heritage asset	Simplified significance	Contribution of setting to heritage significance	Impact of proposal on setting	Overall impact on heritage significance
Shoreham-by-Sea Conservation Area	Moderate - high	Moderate	Positive/Neutral	Positive/Neutral
1 Church of St Mary de Haura	High	Moderate	Positive/Neutral	Positive/Neutral
4 Church House, 29 East Street	Moderate	Moderate	Neutral	Neutral
9 St Mary's House, St Mary's Road	Moderate	Moderate	Neutral	Neutral
12 Cobblestones, St Mary's Road	Moderate	Moderate	Neutral	Neutral
13 Old Scantlings, Church Street	Moderate	Moderate	Neutral	Neutral
24 Old Swan Cottages, 1 & 2 Church Street	Moderate	Moderate	Neutral	Neutral
31 K6 Telephone Kiosk Adjoining War Memorial	Moderate	Moderate	Neutral	Neutral

9.0 CONCLUSIONS

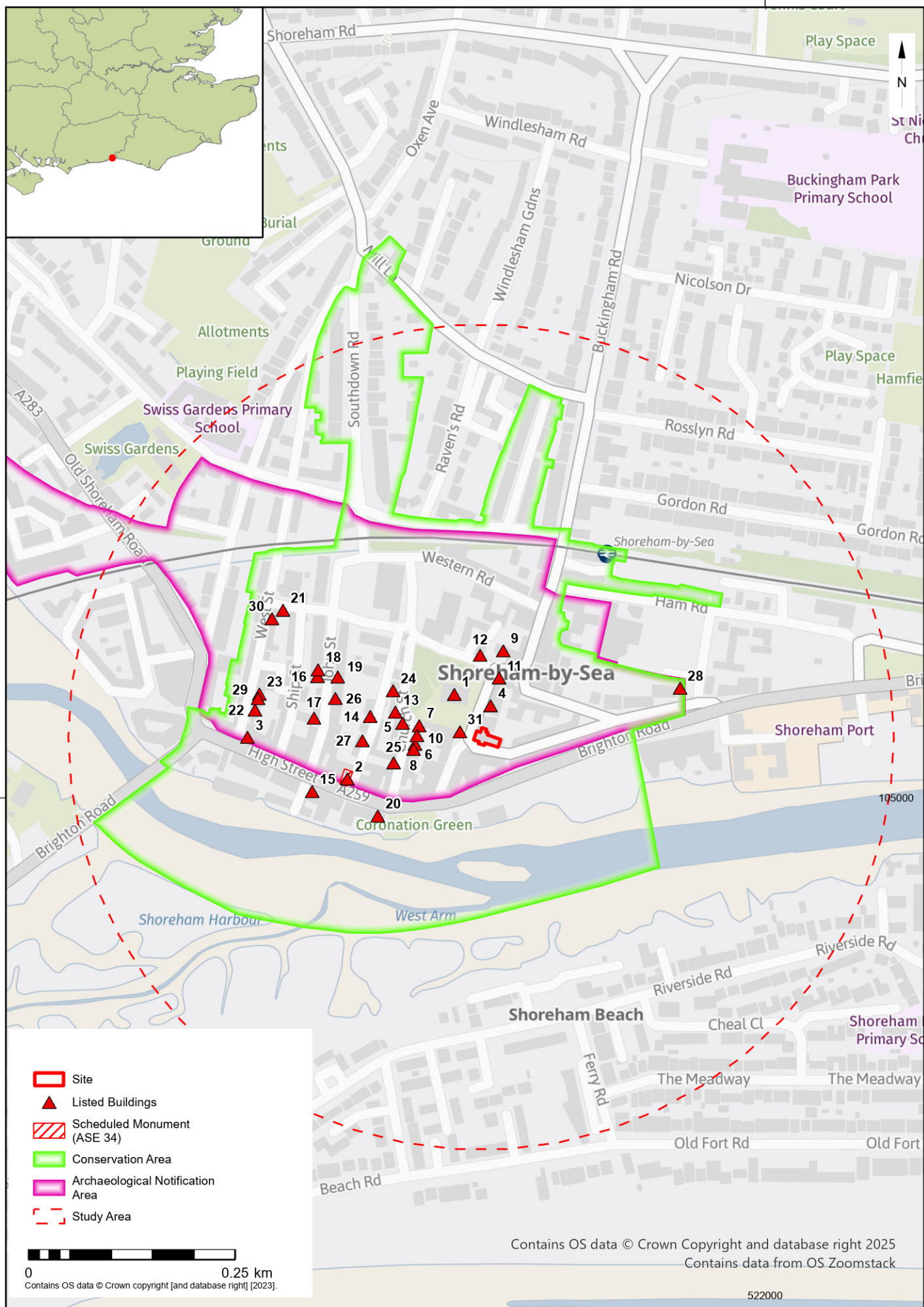
- 10.1 This heritage statement has been undertaken by ASE in relation to the proposed residential development at 24-25 East Street and 1-1a New Road. It considers the significance of relevant heritage assets and the potential effects of the proposed development upon their setting, in line with the requirements of the NPPF.
- 10.2 This study has identified one conservation area, seven listed buildings and several non-designated heritage assets, that either have an important historical component to their heritage significance or are directly intervisible with the site. The impact of the proposed scheme upon the setting of these heritage assets has been considered, as has the resultant impact upon their heritage significance.
- 10.3 The results of this assessment can be summarised as follows:
- 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.

ACKNOWLEDGEMENTS

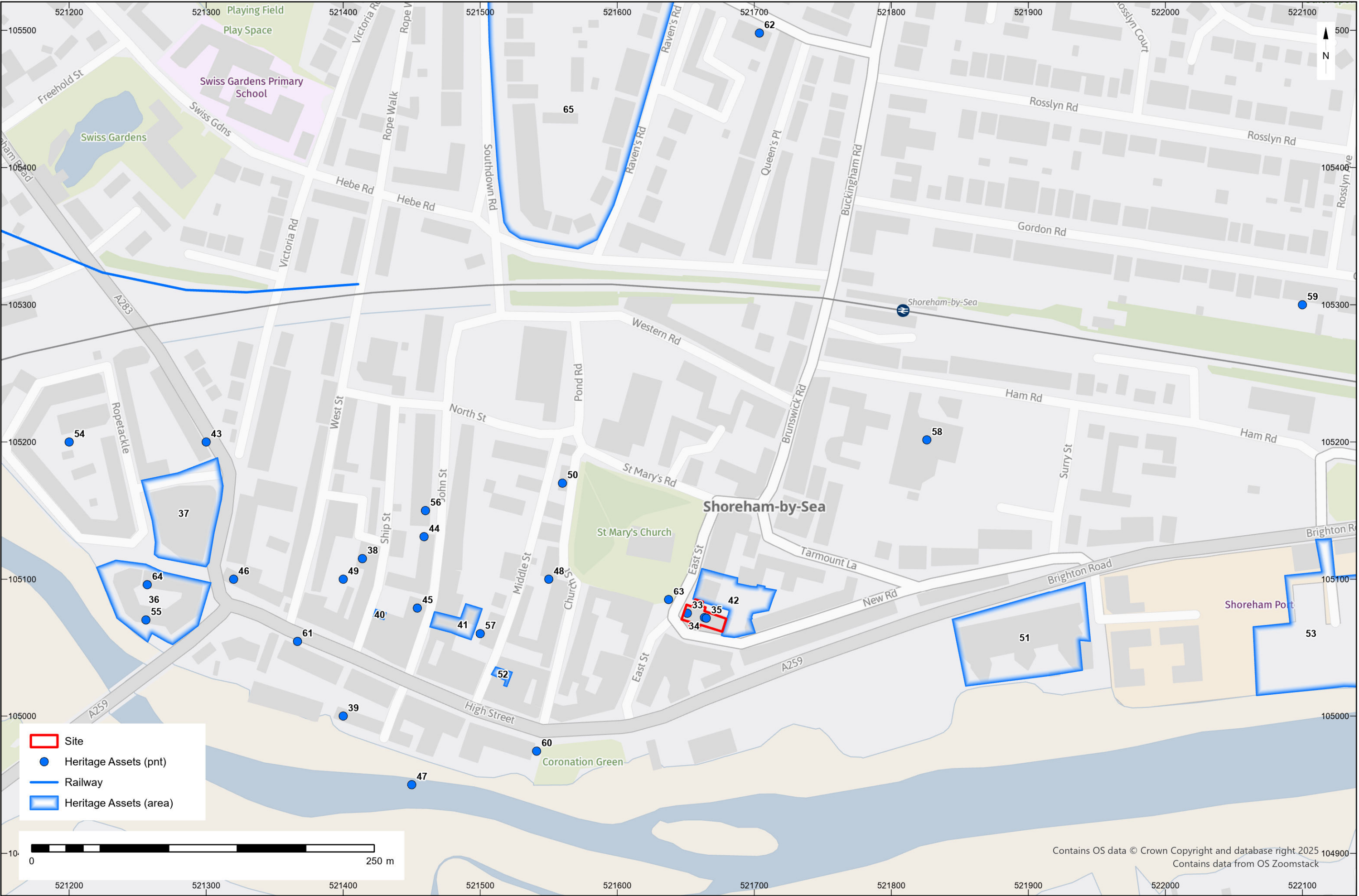
Archaeology South-East would like to thank W Group for commissioning this report, and W Group and Willow Architects for their assistance on site.

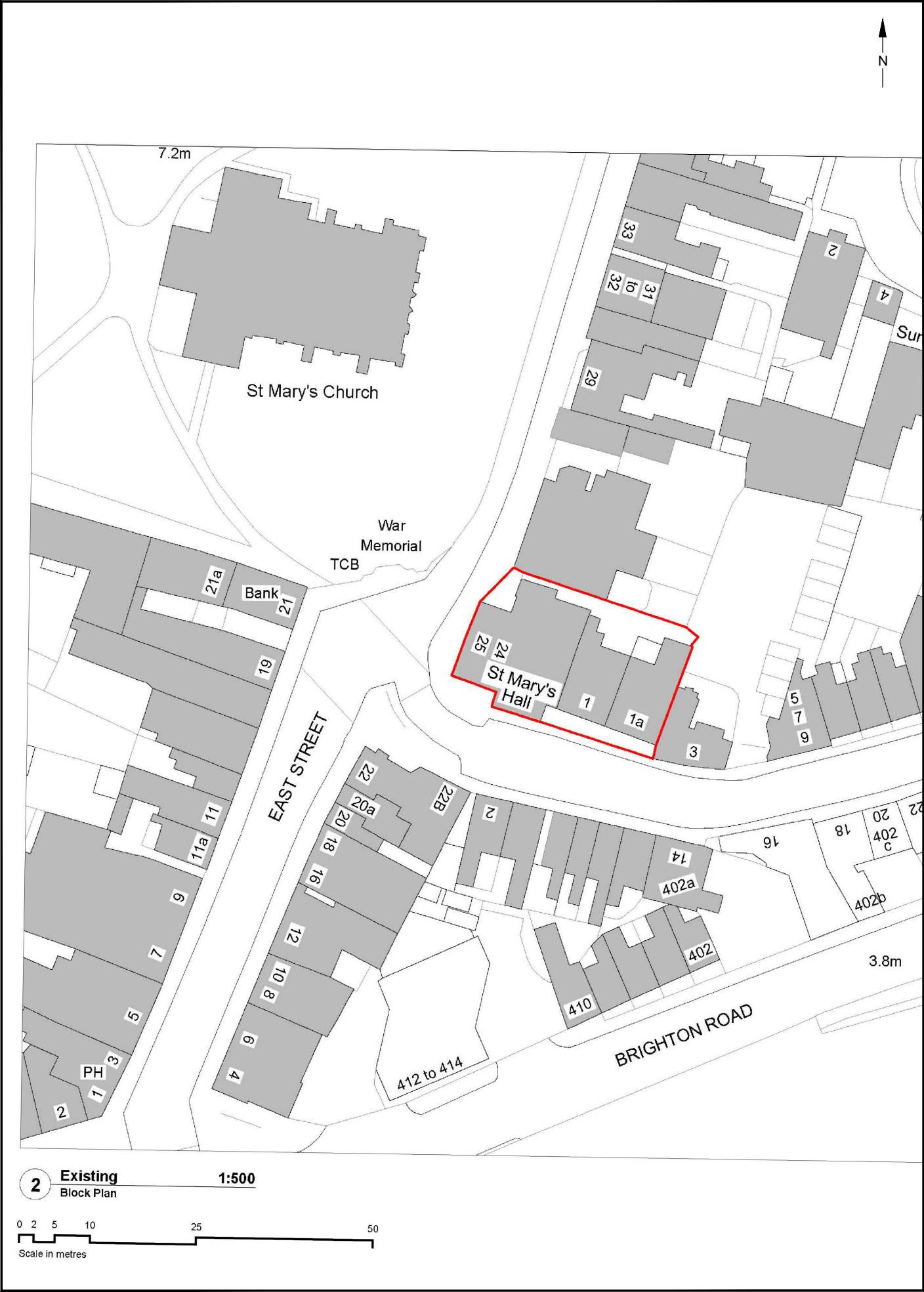
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© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig. 1
Project Ref: 250480	Sept 2025	Site location and designated heritage assets	
Report Ref: DBA	Drawn by: EMH		







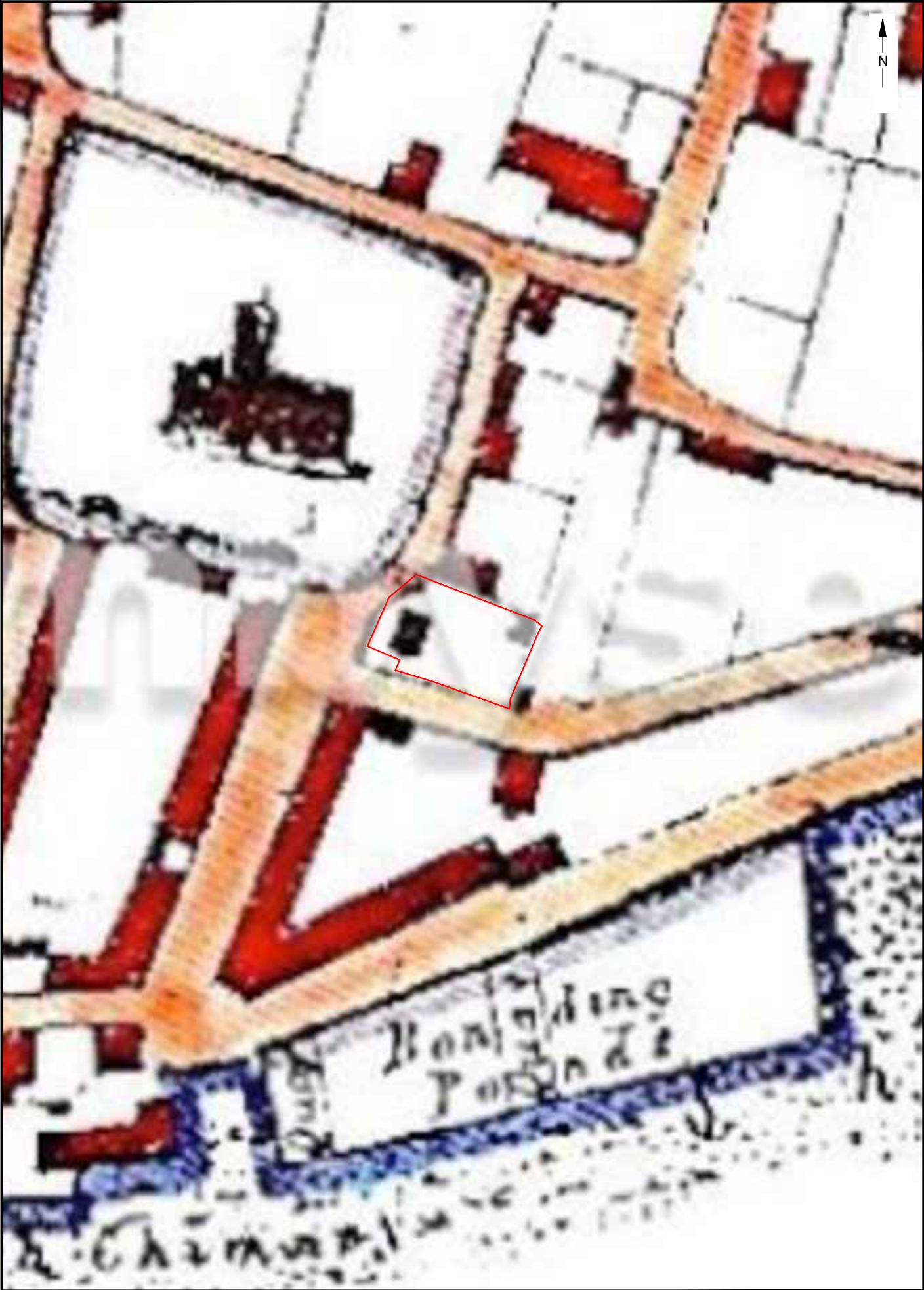
© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig.4
Project Ref: 250480	Sept 2025	Desmaretz map, 1753	
Report Ref: DBA	Drawn by: EMH		



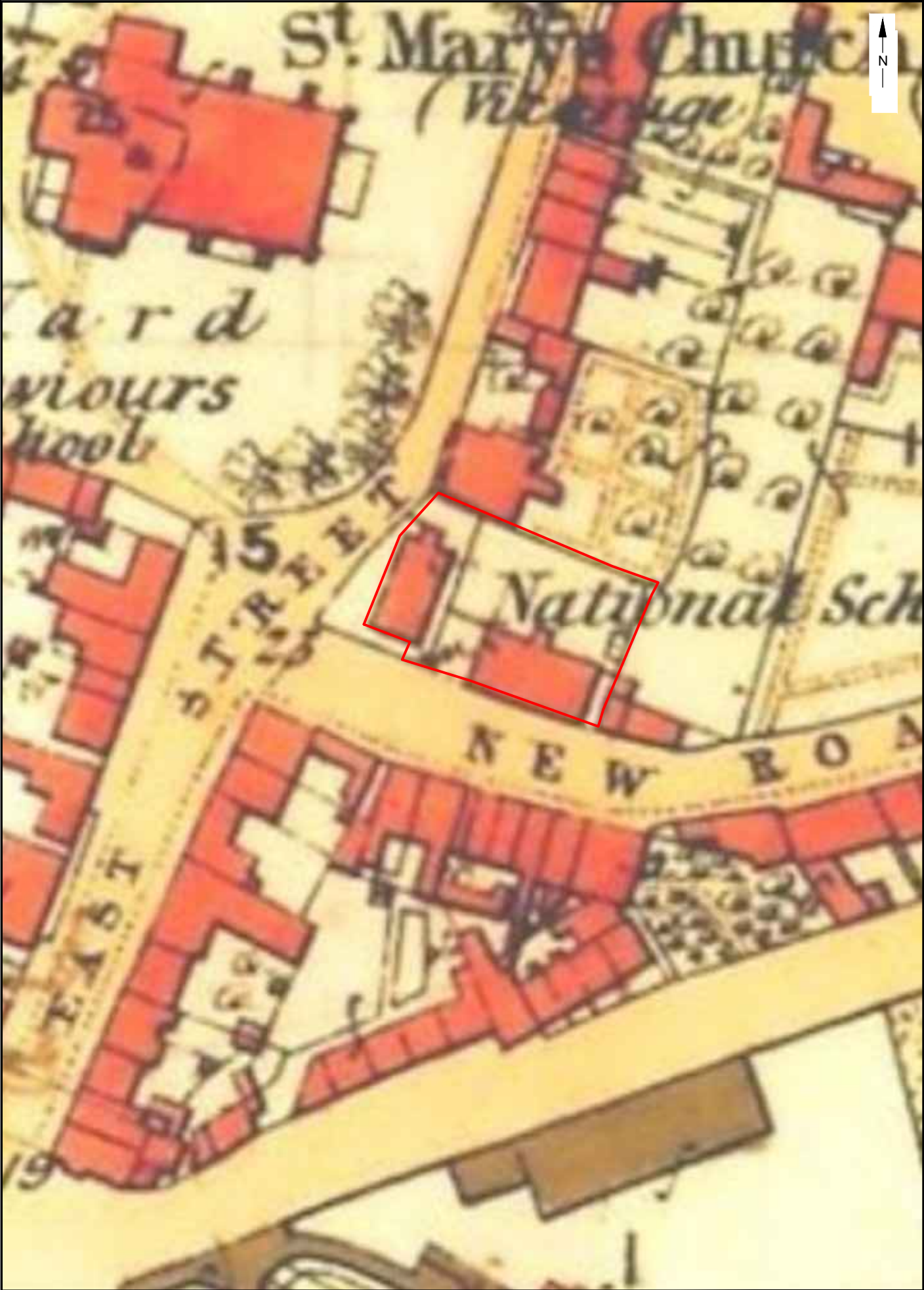




© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig. 7
Project Ref: 250480	Sept 2025	Town plan, 1828	
Report Ref: DBA	Drawn by: EMH		



© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig. 8
Project Ref: 250480	Sept 2025	Saunders' map, 1844	
Report Ref: DBA	Drawn by: EMH		

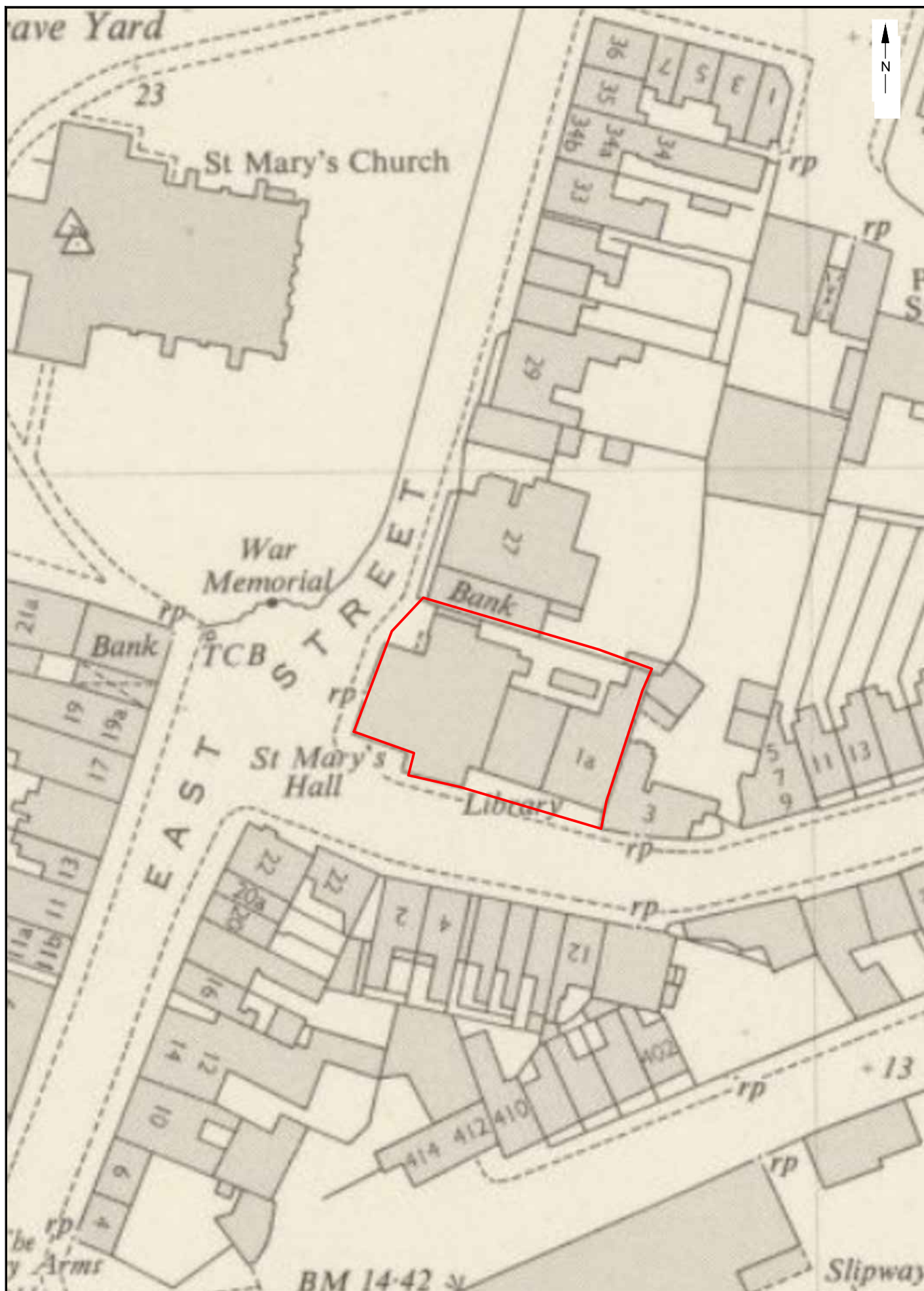


© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig. 9
Project Ref: 250480	Sept 2025	Town plan, 1872	
Report Ref: DBA	Drawn by: EMH		





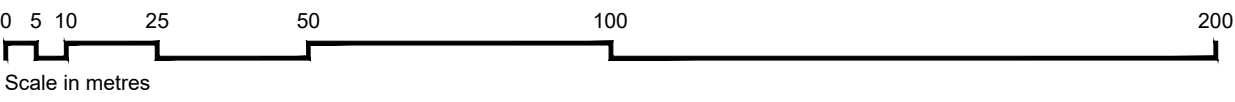
© Archaeology South-East		24-25 East Street and 1-1a New Road, Shoreham-by-Sea, West Sussex	Fig. 11
Project Ref: 250480	Sept 2025	Ordnance Survey, 1931	
Report Ref: DBA	Drawn by: EMH		



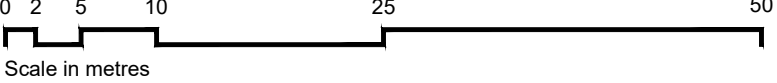
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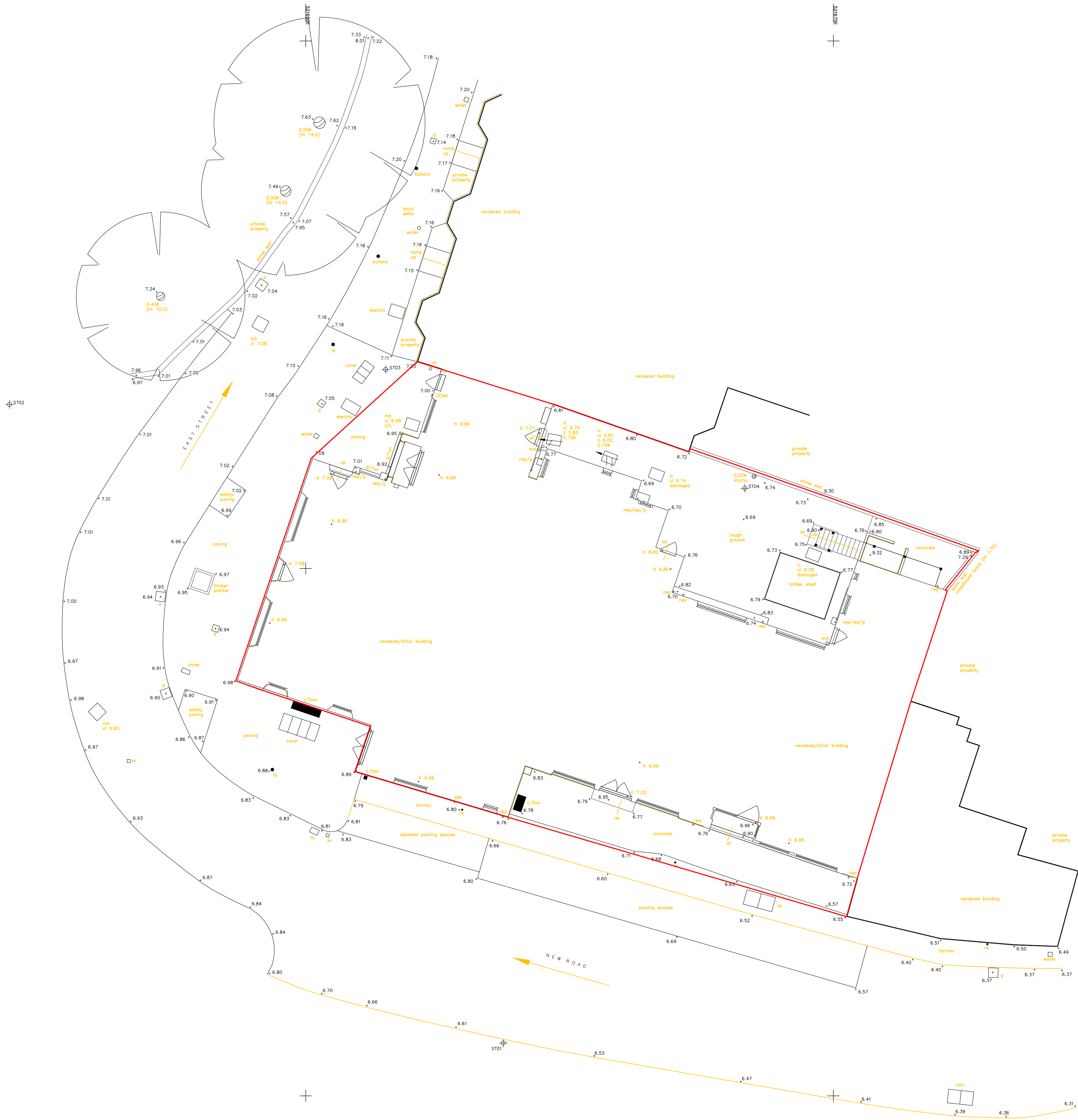


1 Existing Location Plan 1:1250



2 Existing Block Plan 1:500





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APPLICATION & SITE OWNERSHIP BOUNDARY

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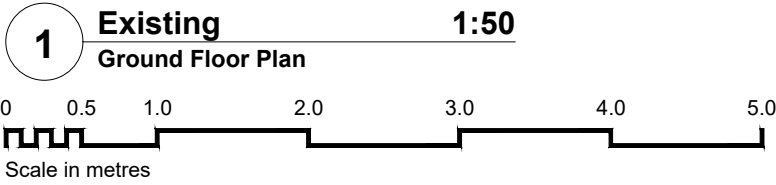
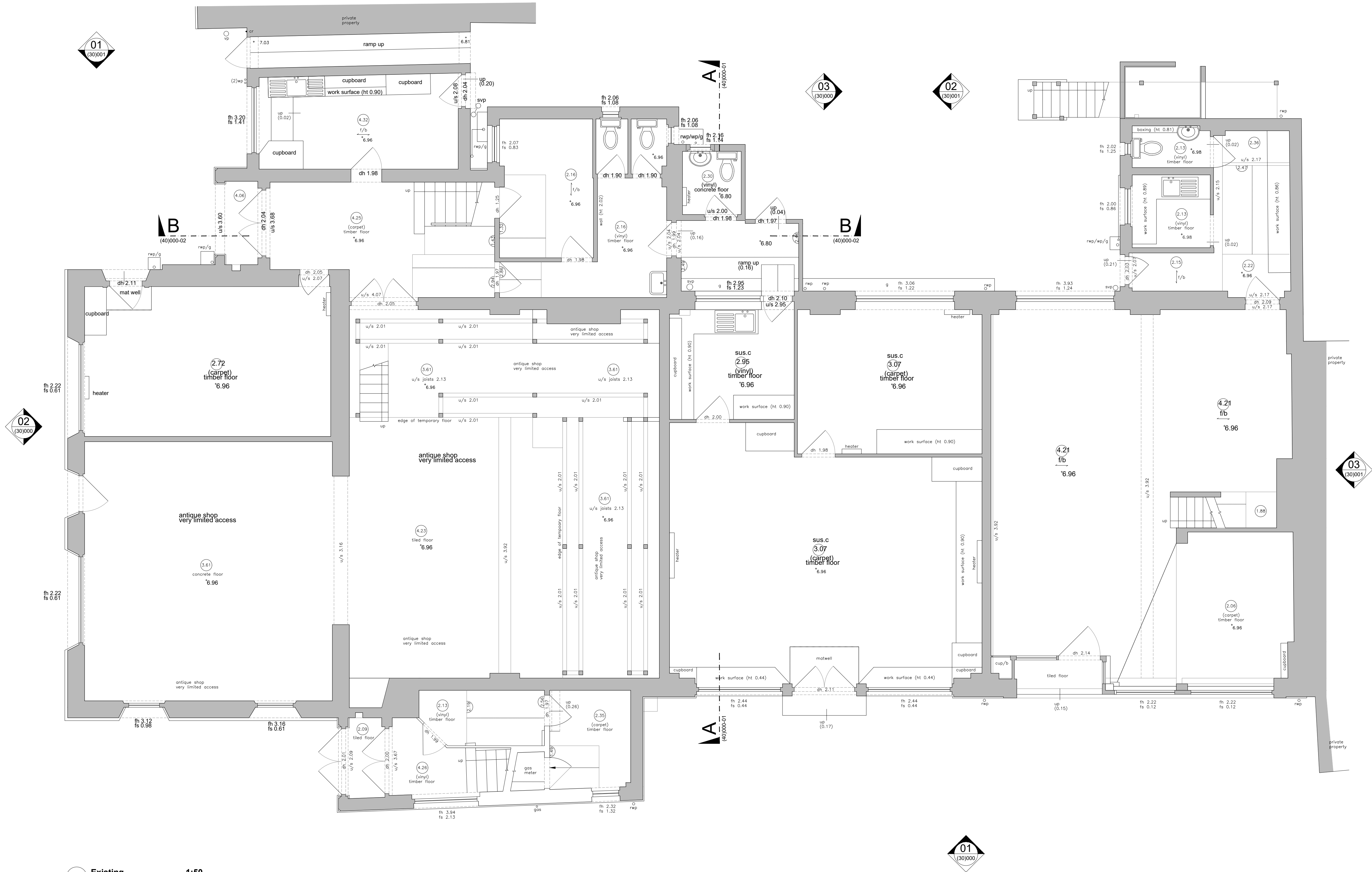
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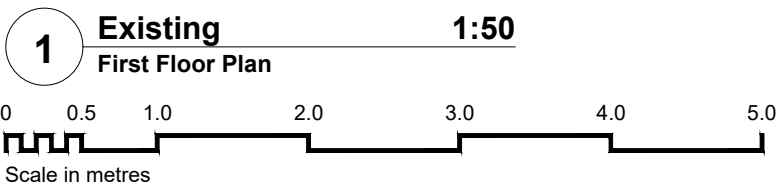
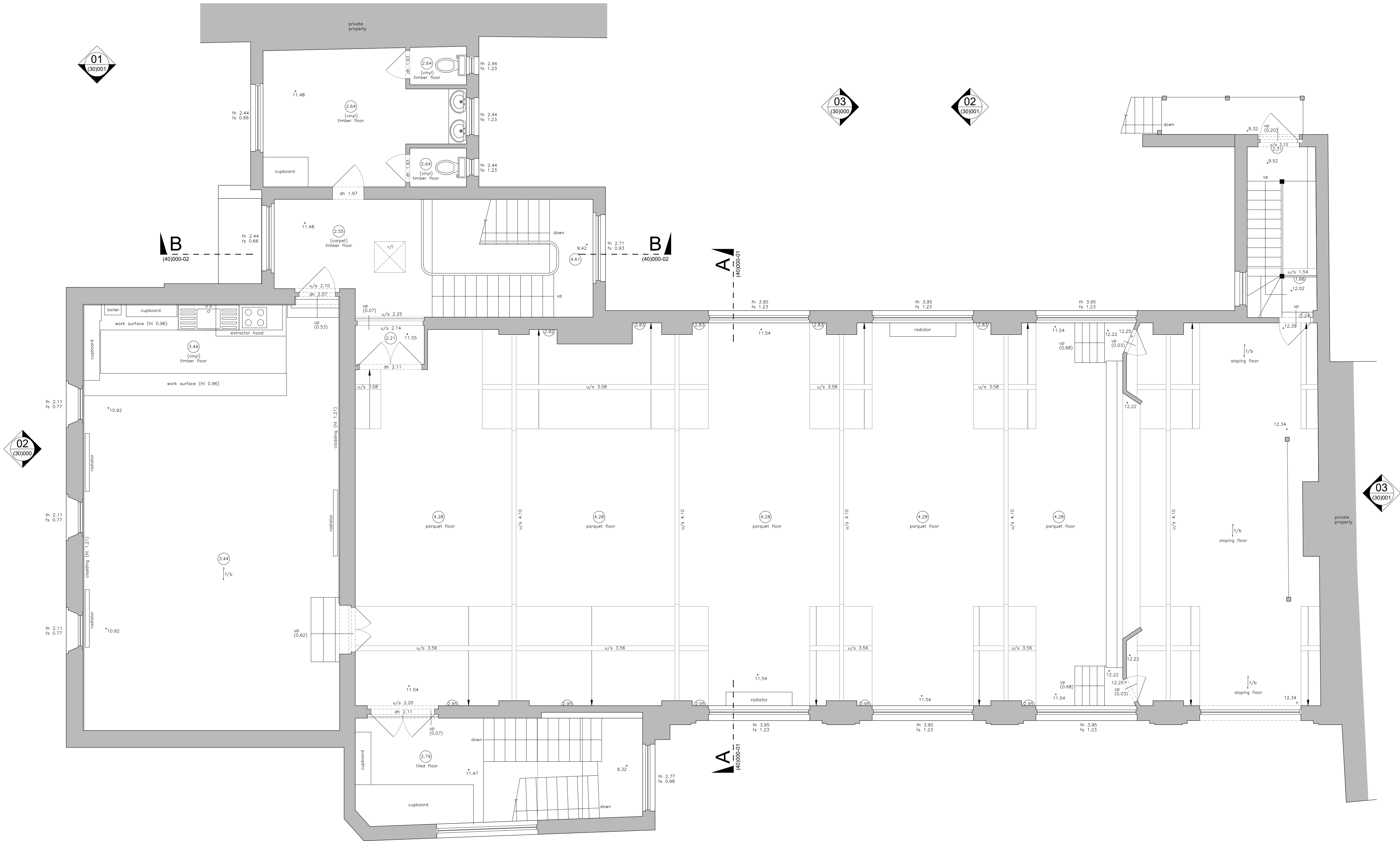
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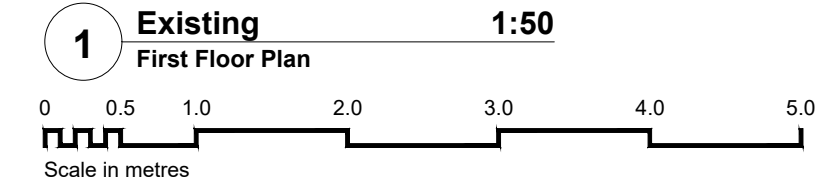
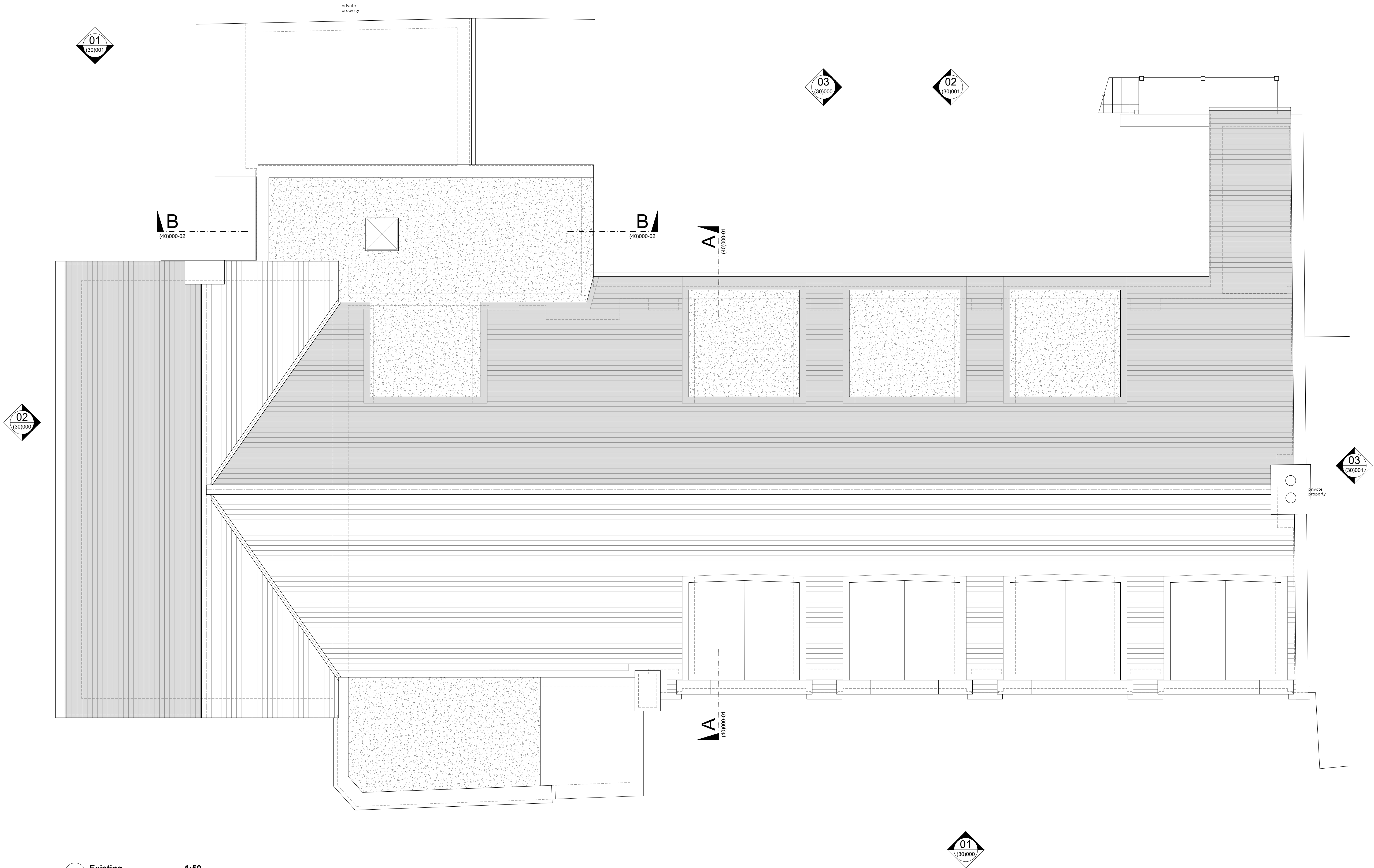
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drawing no. revision



*Roof plan drawn indicatively from measured survey information.

W

1094SM | St Marys

24-25 East Street, Shoreham

key:

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drawing title:

Existing
Roof Plan

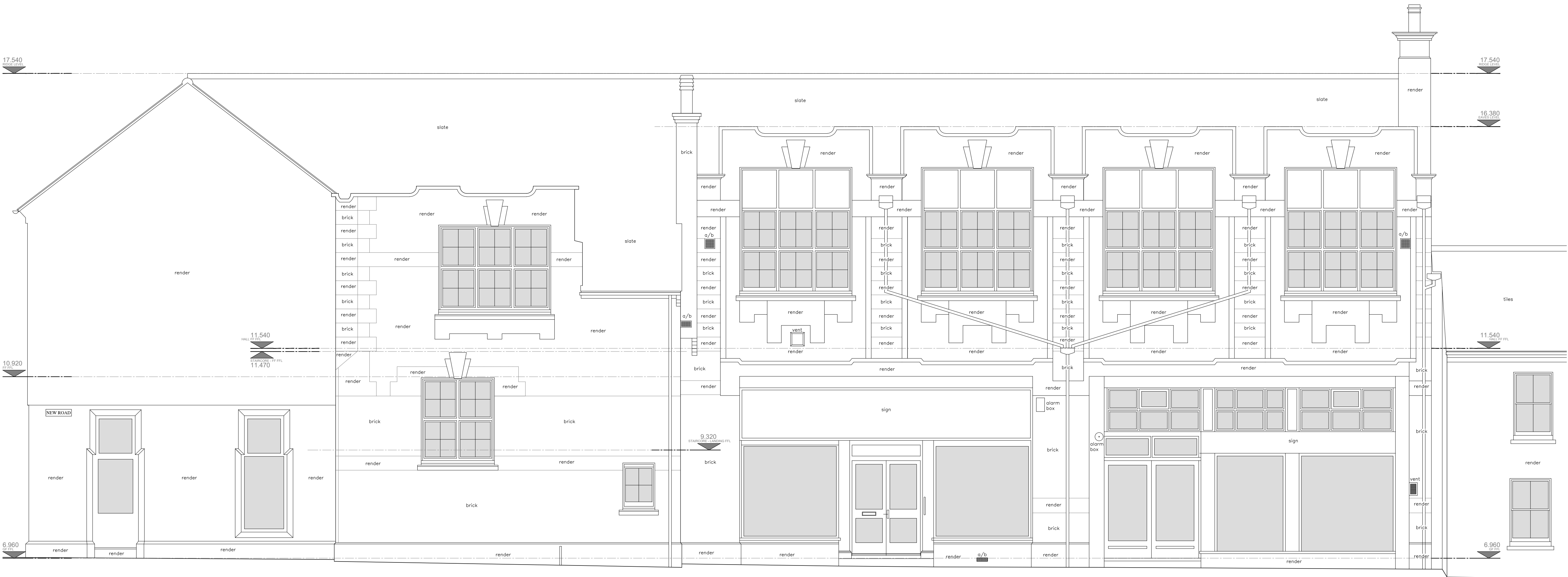
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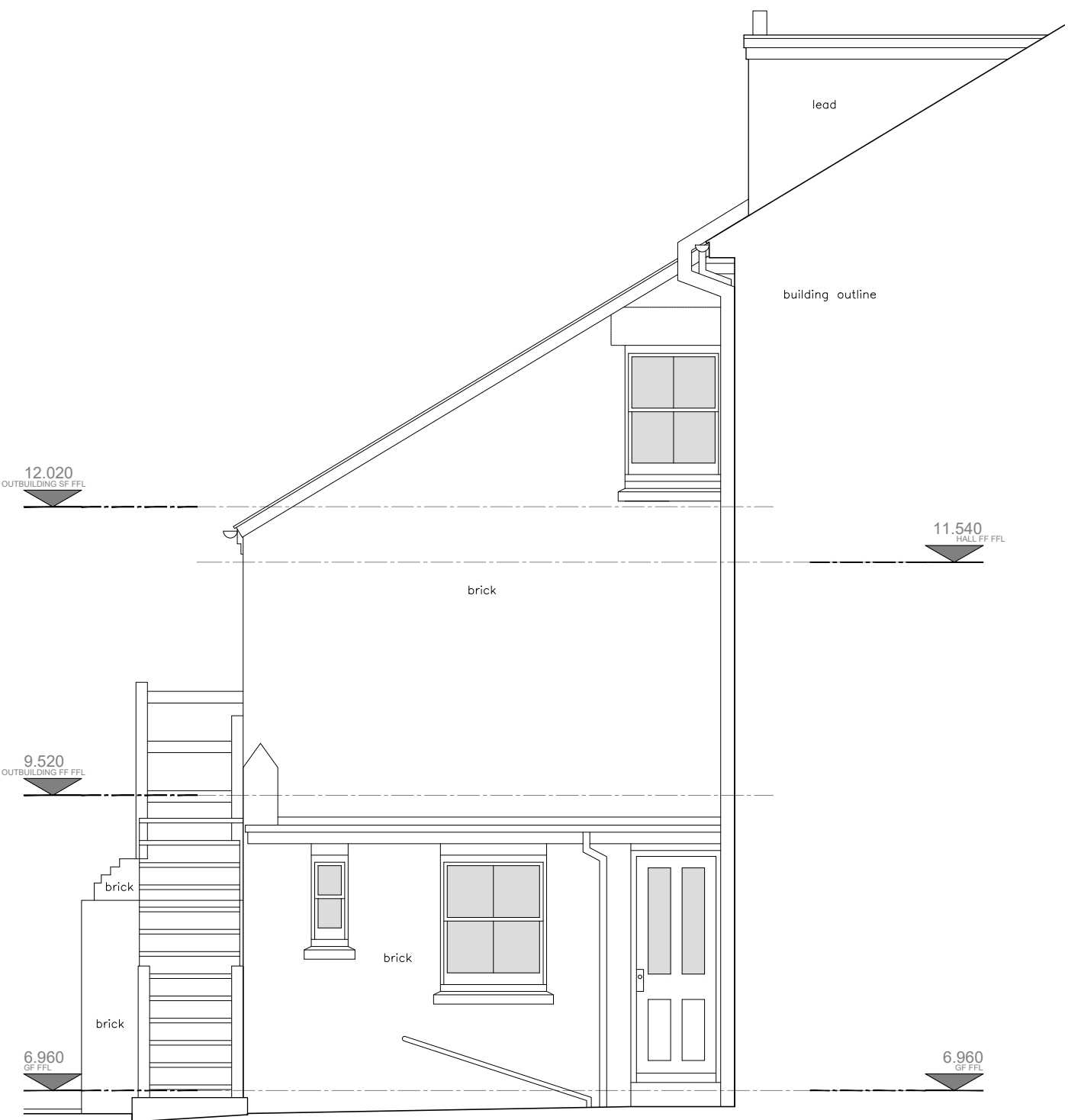


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South West Elevation

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Scale in metres



2 Existing 1:50
North West Elevation



3 Existing 1:50
North West Elevation

W

1094SM

St Marys

24-25 East Street, Shoreham

key:

02
(30/000)

03
(30/000)

01
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drawing title:

Existing
South West & North West Elevations

scale @ A1:

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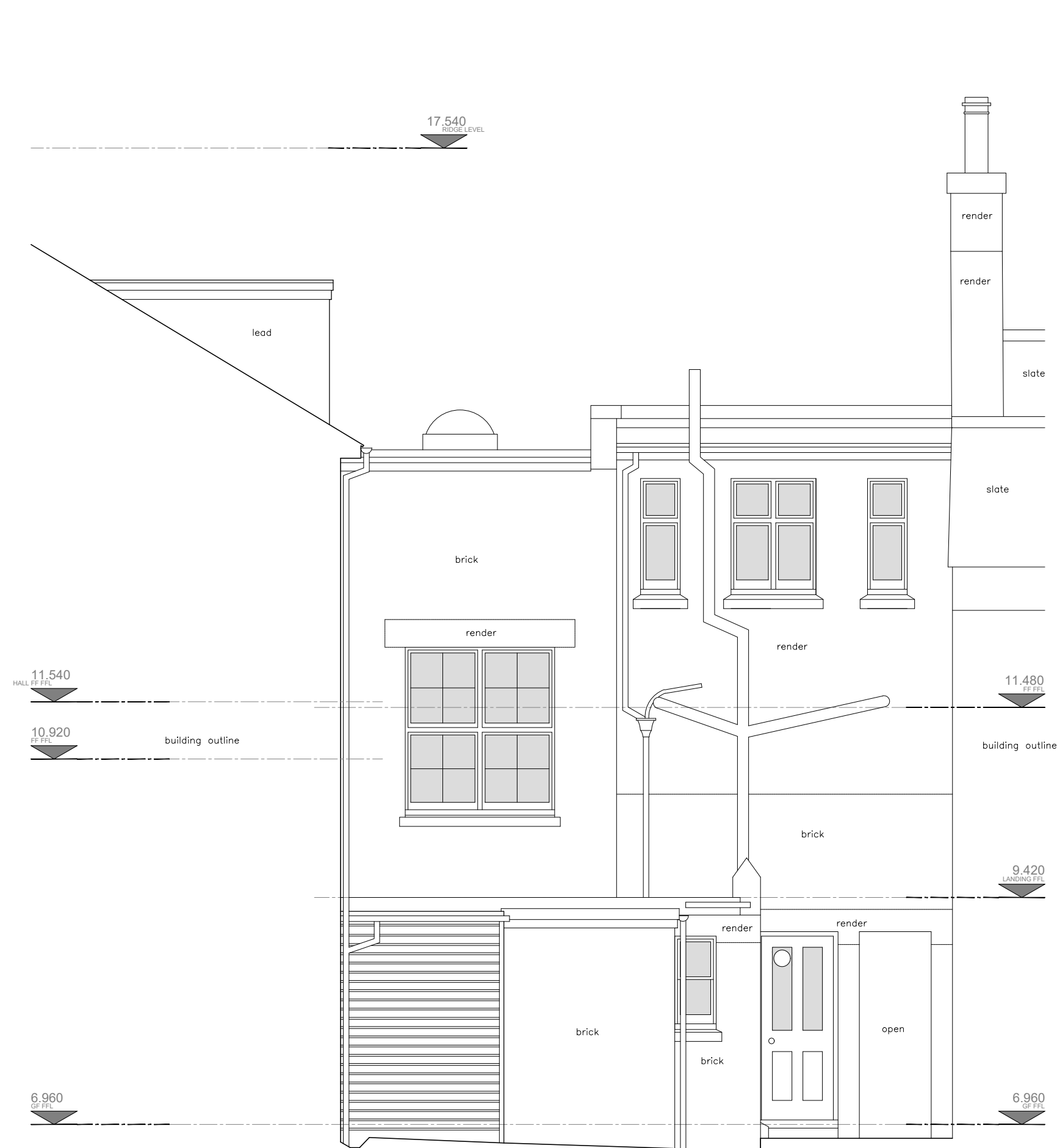
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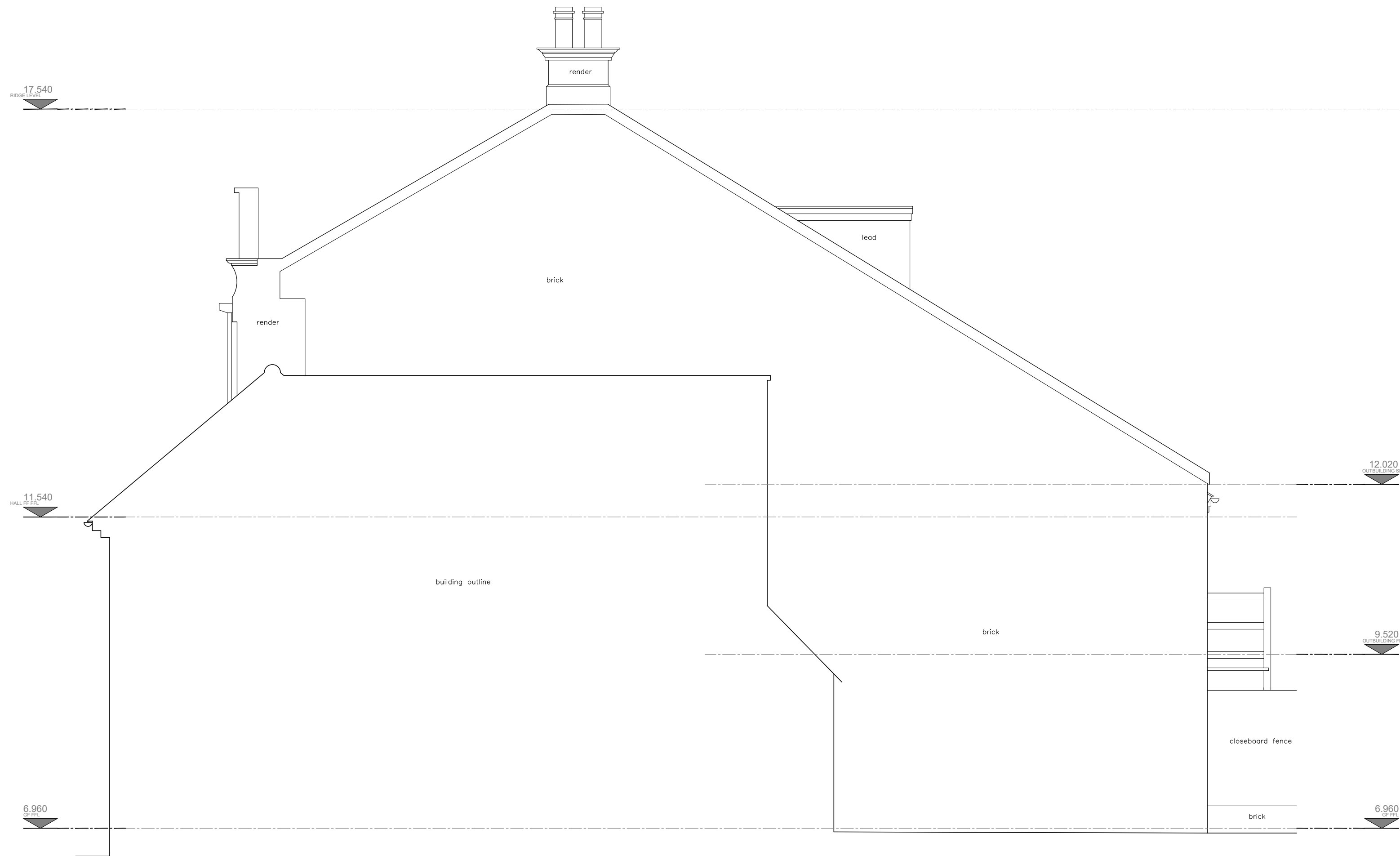
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Scale in metres



2 Existing South East Elevation 1:50



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1094SM | St Marys

24-25 East Street, Shoreham

key:

01
(30)001

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Existing
North East & South East Elevations

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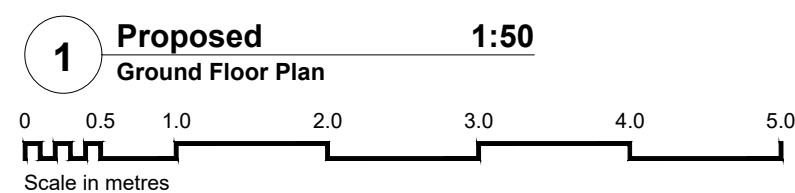
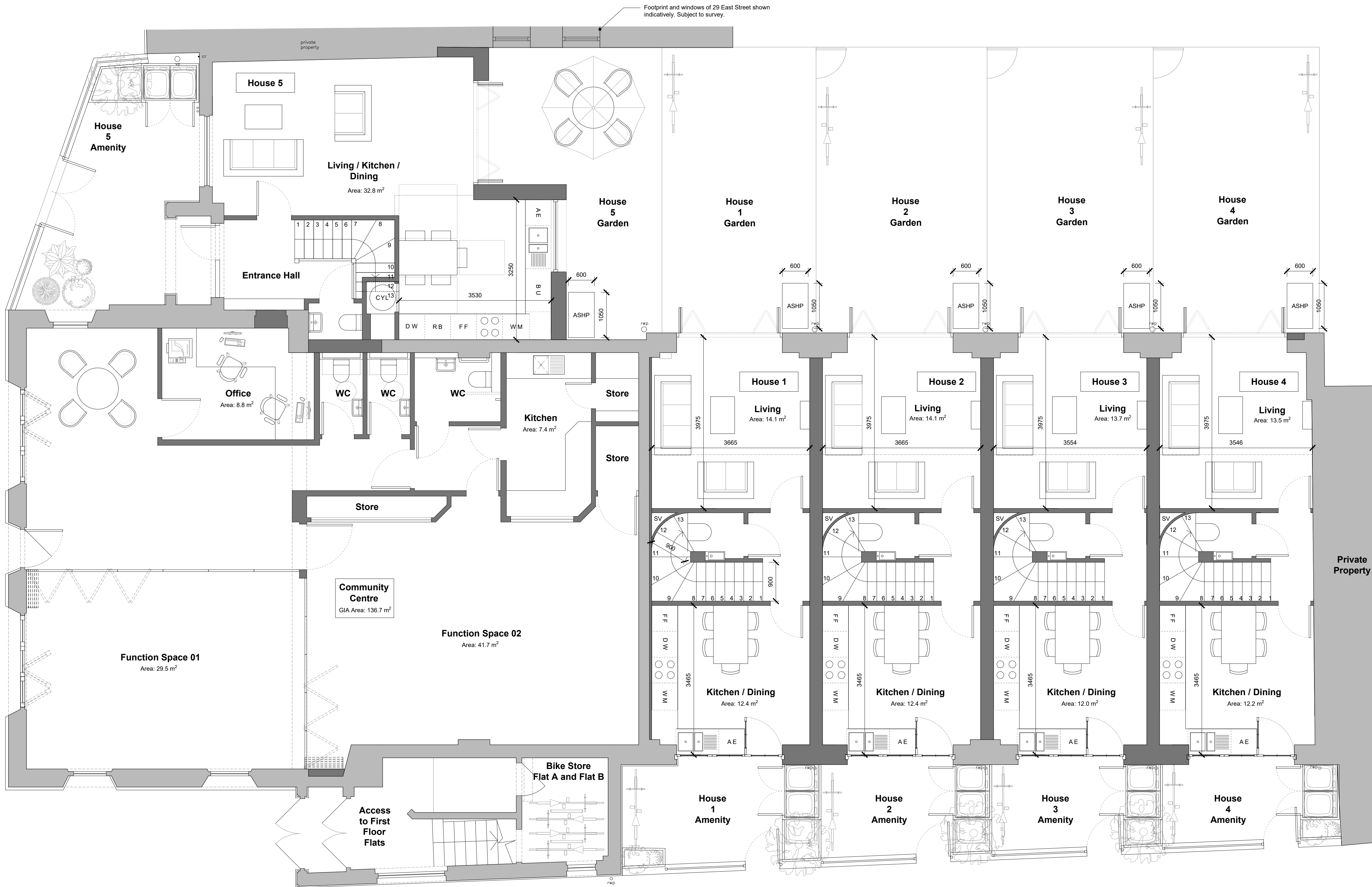
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revision

APPENDIX 2: PROPOSED DEVELOPMENT



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EXISTING WALL

NEW WALL

SV SERVICE VOID

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B	19/09/2025	Issued for information.	SP	PT
A	04/09/2025	Issued for information.	SP	PT
/	28/08/2025	Issued for information.	SP	PT

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Information

drawn by:
SP

checked by:
PT

project north:



drawing title:
Proposed
Ground Floor Plan

scale @ A1:
1:50

(21)000

drawing no.

revision

C



key:

EXISTING WALL

NEW WALL

SV

SERVICE VOID

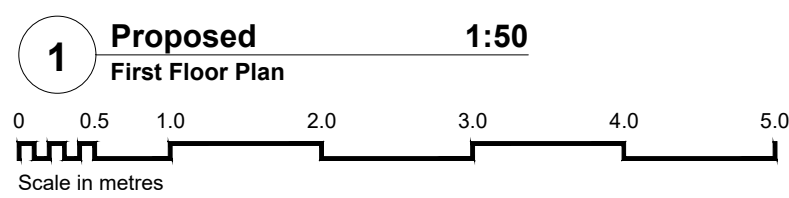
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A	04/09/2025	Issued for information.	SP	PT
/	28/08/2025	Issued for information.	SP	PT
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drawn by:		checked by:	
SP		PT	
project north:			



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Proposed	1:50
Lower First Floor Plan	

(21)001	C
drawing no.	revision



1094SM | St Marys
24-25 East Street, Shoreham

key:

EXISTING WALL
NEW WALL
SERVICE VOID

C	21/10/2025	Issued for information. Furniture layouts amended. House 05 stair layout amended.	SP	PT
B	19/09/2025	Issued for information.	SP	PT
A	04/09/2025	Issued for information.	SP	PT
/	28/08/2025	Issued for information.	SP	PT

rev.	date	notes	drawn	checked
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Empire Land and Homes Ltd.

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info@willowarchitects.net

issued for:
Information

drawn by:
SP

checked by:
PT

project north:

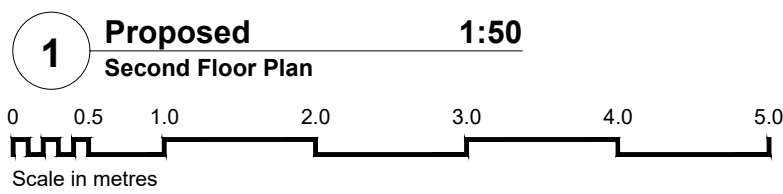
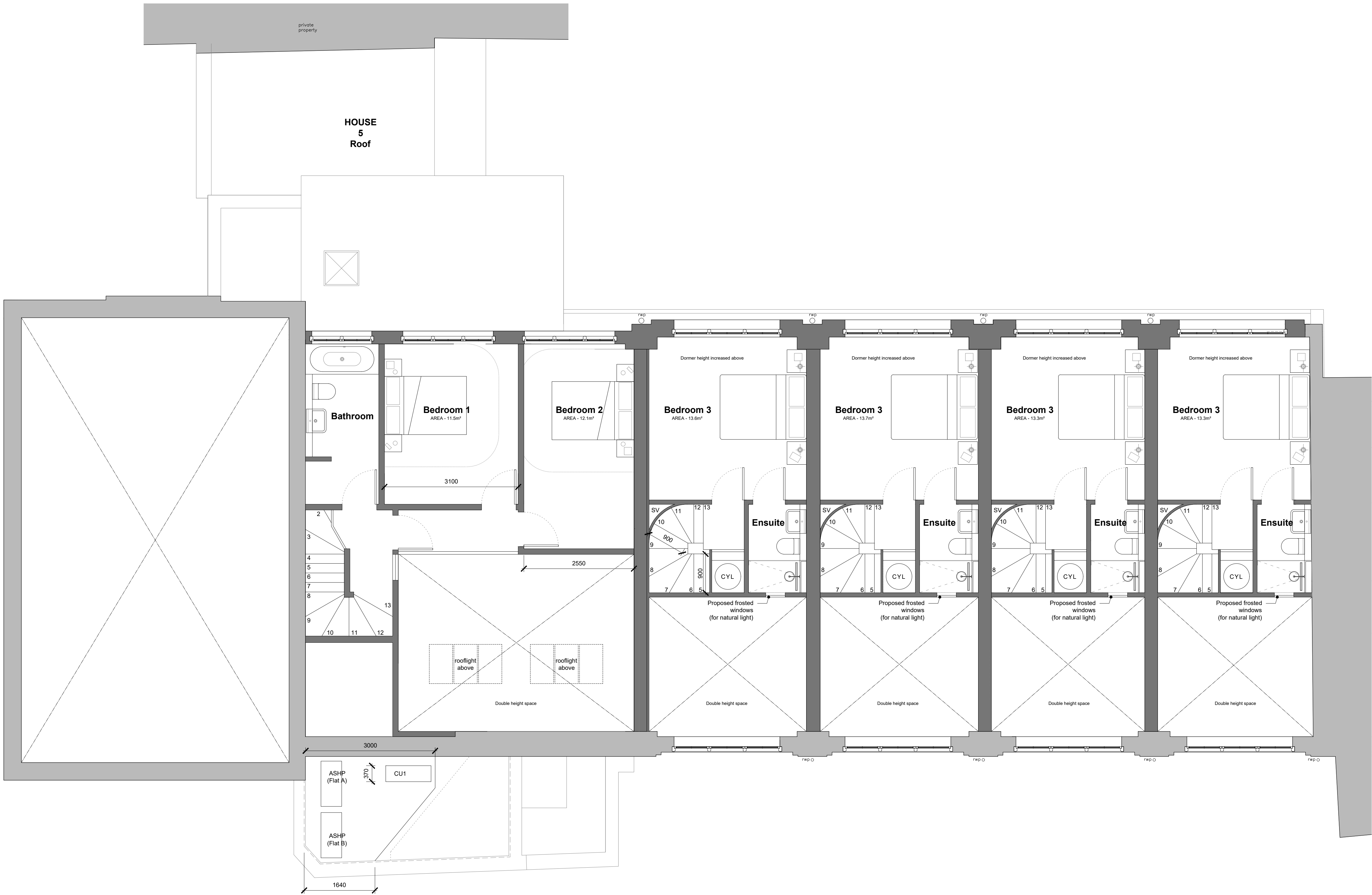


drawing title:
Proposed
First Floor Plan

scale @ A1:
1:50

(21)002

drawing no. revision



1094SM | **St Marys**
24-25 East Street, Shoreham

key:

EXISTING WALL
NEW WALL
SV SERVICE VOID

C	21/10/2025	Issued for information. Furniture layouts amended.	SP	PT
B	19/09/2025	Issued for information.	SP	PT
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/	28/08/2025	Issued for information.	SP	PT

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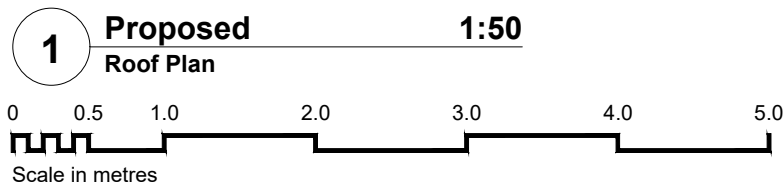
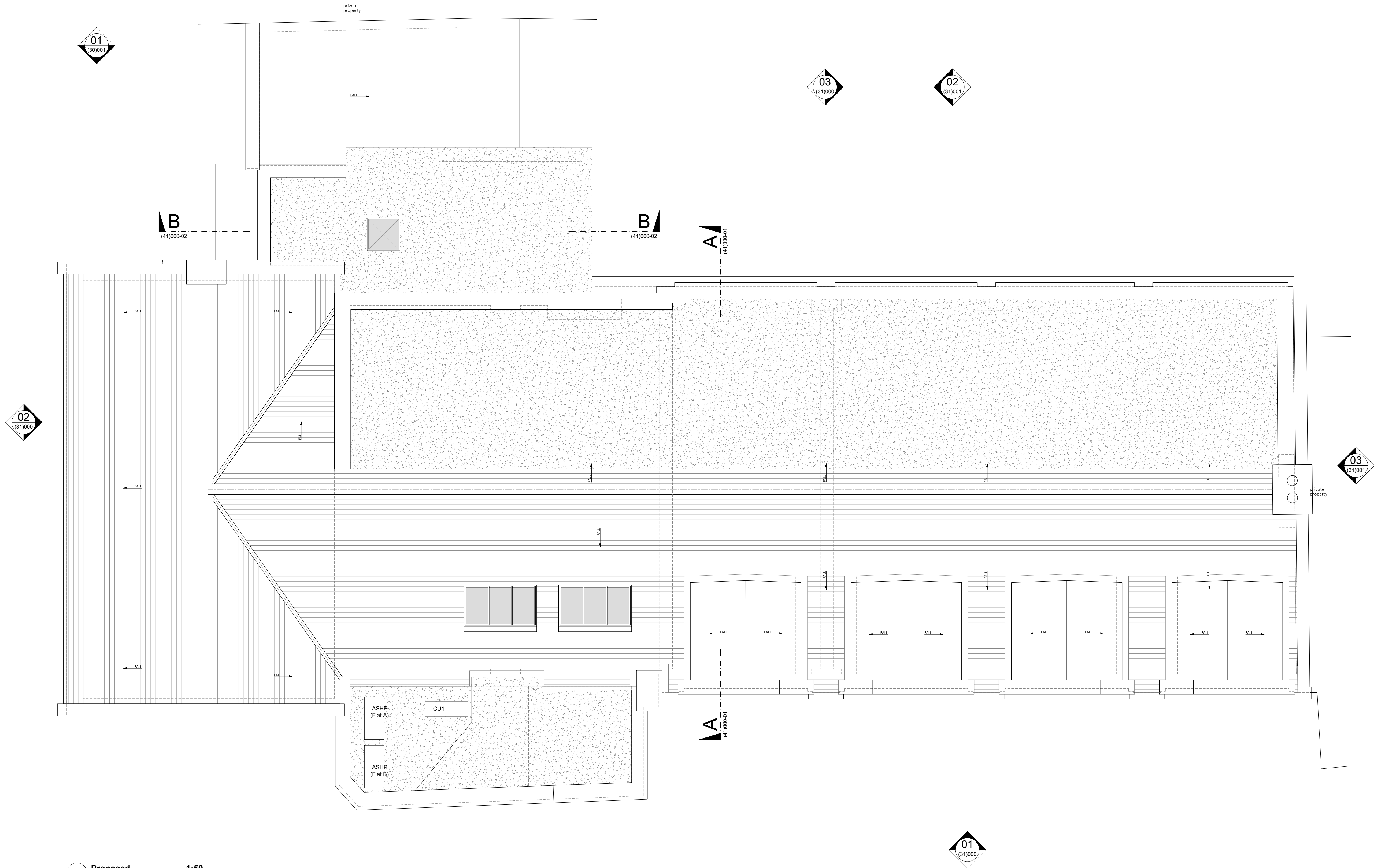


drawing title:
Proposed
Second Floor Plan

scale @ A1:
1:50

(21)003

drawing no. revision



*Roof plan drawn indicatively from measured survey information.

key:

B	21/10/2025	Issued for information. Missing adjusted. MEP equipment indicated.	SP	PT
A	19/09/2025	Issued for information.	SP	PT
/	04/09/2025	Issued for information.	SP	PT

rev.	date	notes	drawn	checked
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Information

drawn by: SP checked by: PT

project north:



drawing title:
Proposed
Roof Plan
scale @ A1:
1:50

(21)004
drawing no. revision



1 Proposed South West Elevation 1:50

Scale in metres



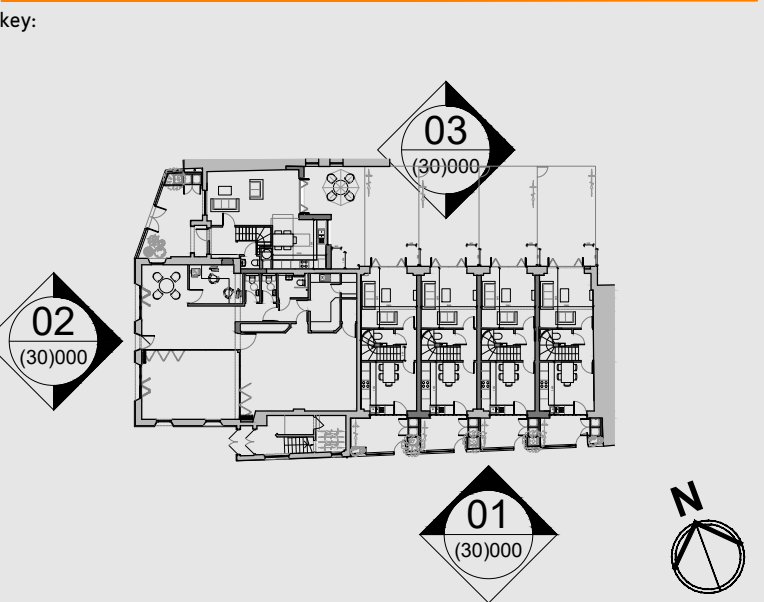
2 Proposed North West Elevation 1:50

3 Proposed North West Elevation 1:50



St Marys
24-25 East Street, Shoreham

1094SM



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issued for:
Information

drawn by:
SP

checked by:
PT

project north:

drawing title:
Proposed
South West & North West Elevations

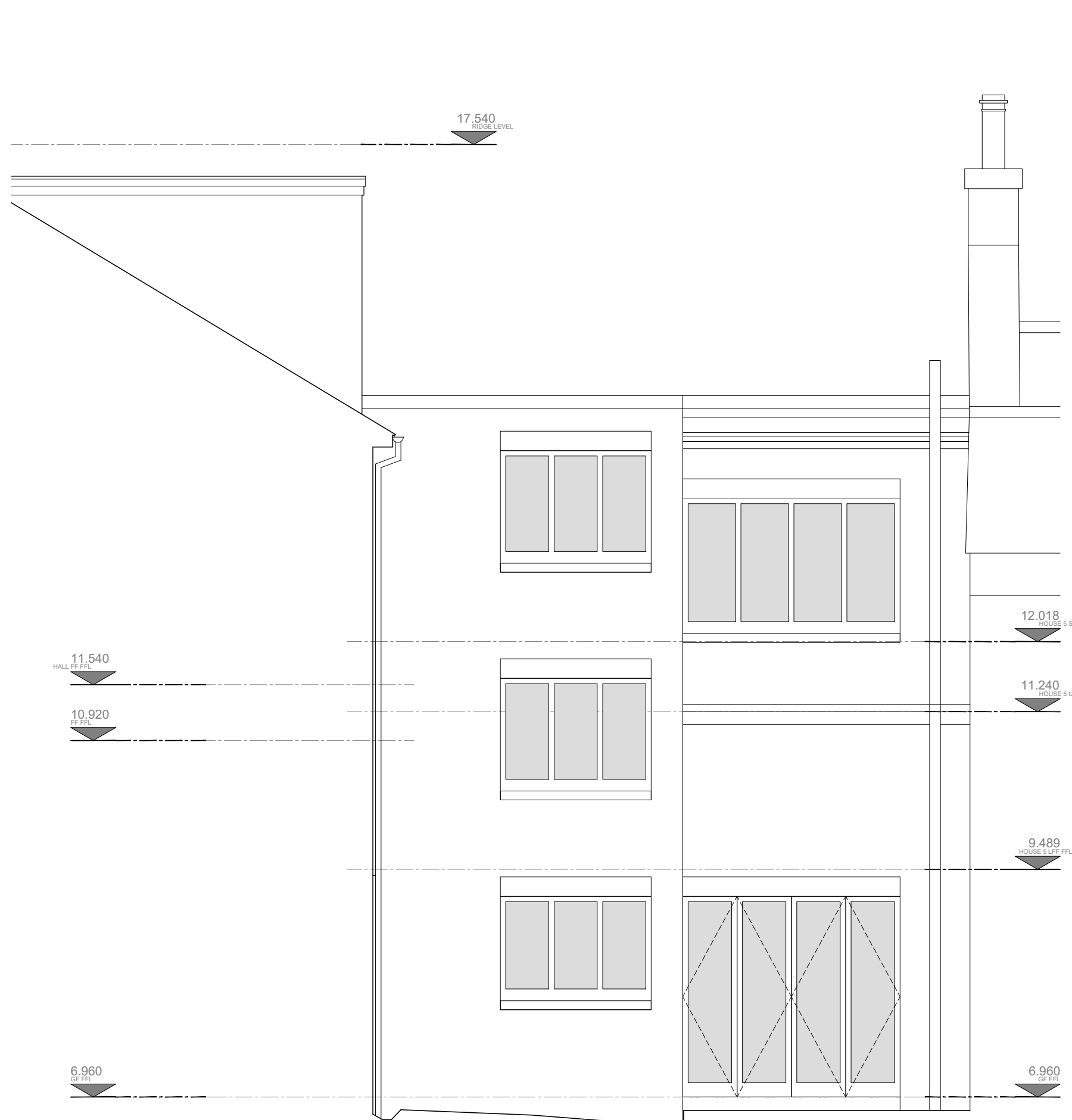
scale @ A1:
1:50

(31)000

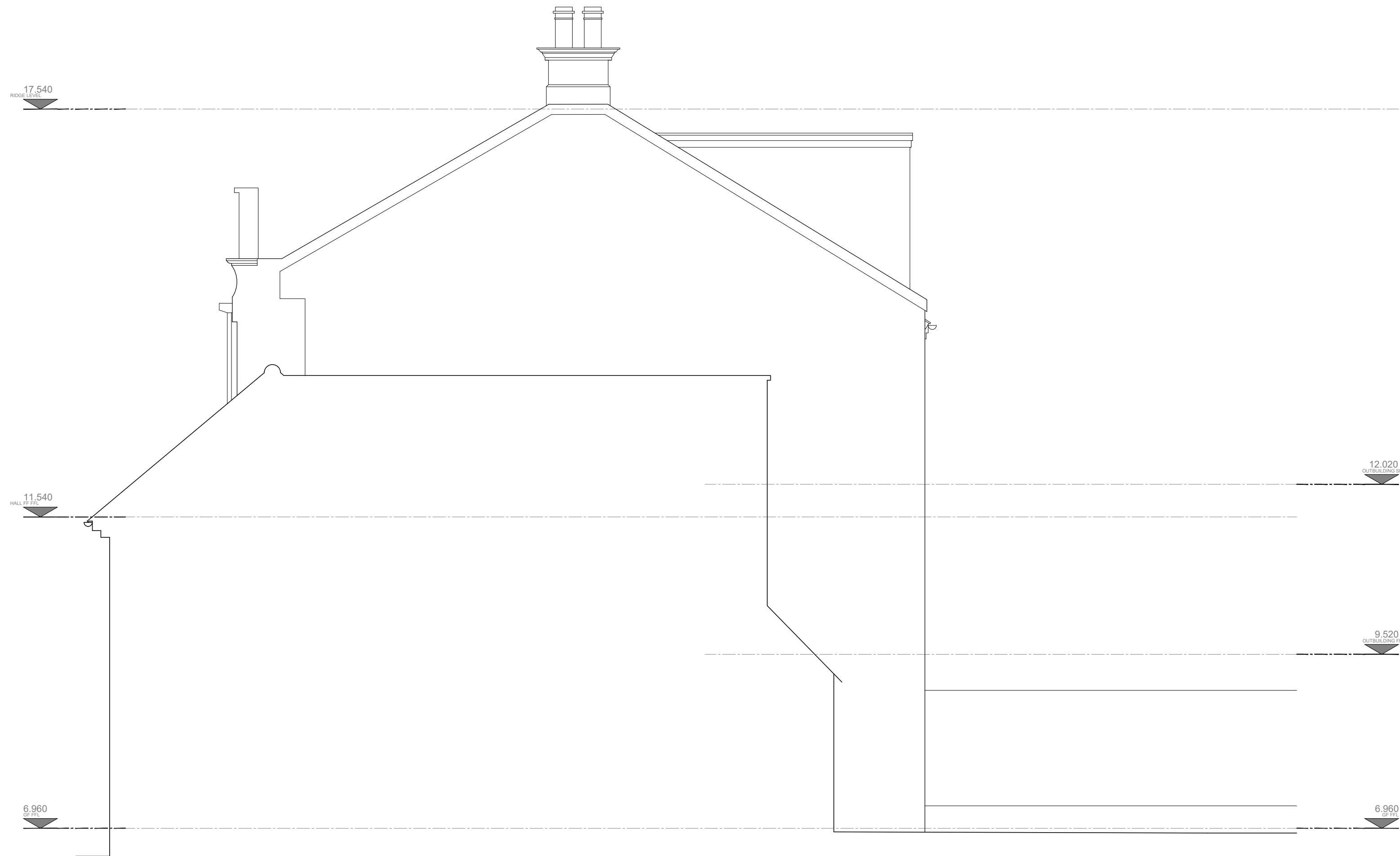
drawing no. B



1 Proposed North East Elevation 1:50
Scale in metres



2 Proposed South East Elevation 1:50

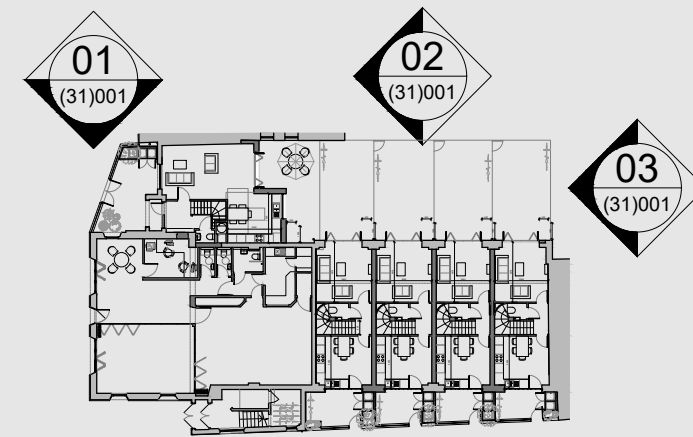


3 Proposed South East Elevation 1:50



1094SM | St Marys
24-25 East Street, Shoreham

key:



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A	19/09/2025	Issued for information.	SP	PT
/	04/09/2025	Issued for information.	SP	PT

rev.	date	notes	drawn	checked
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SP

checked by:
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project north:

drawing title:
Proposed
North East & South East Elevations

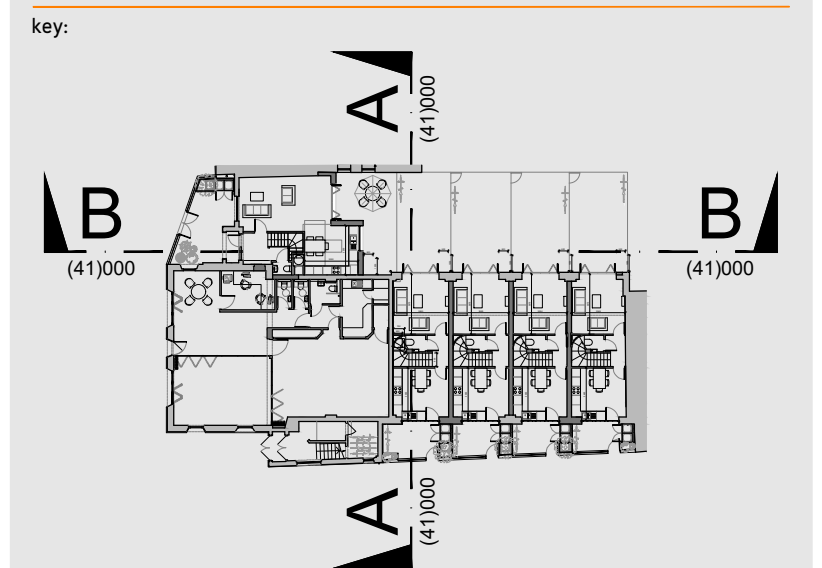
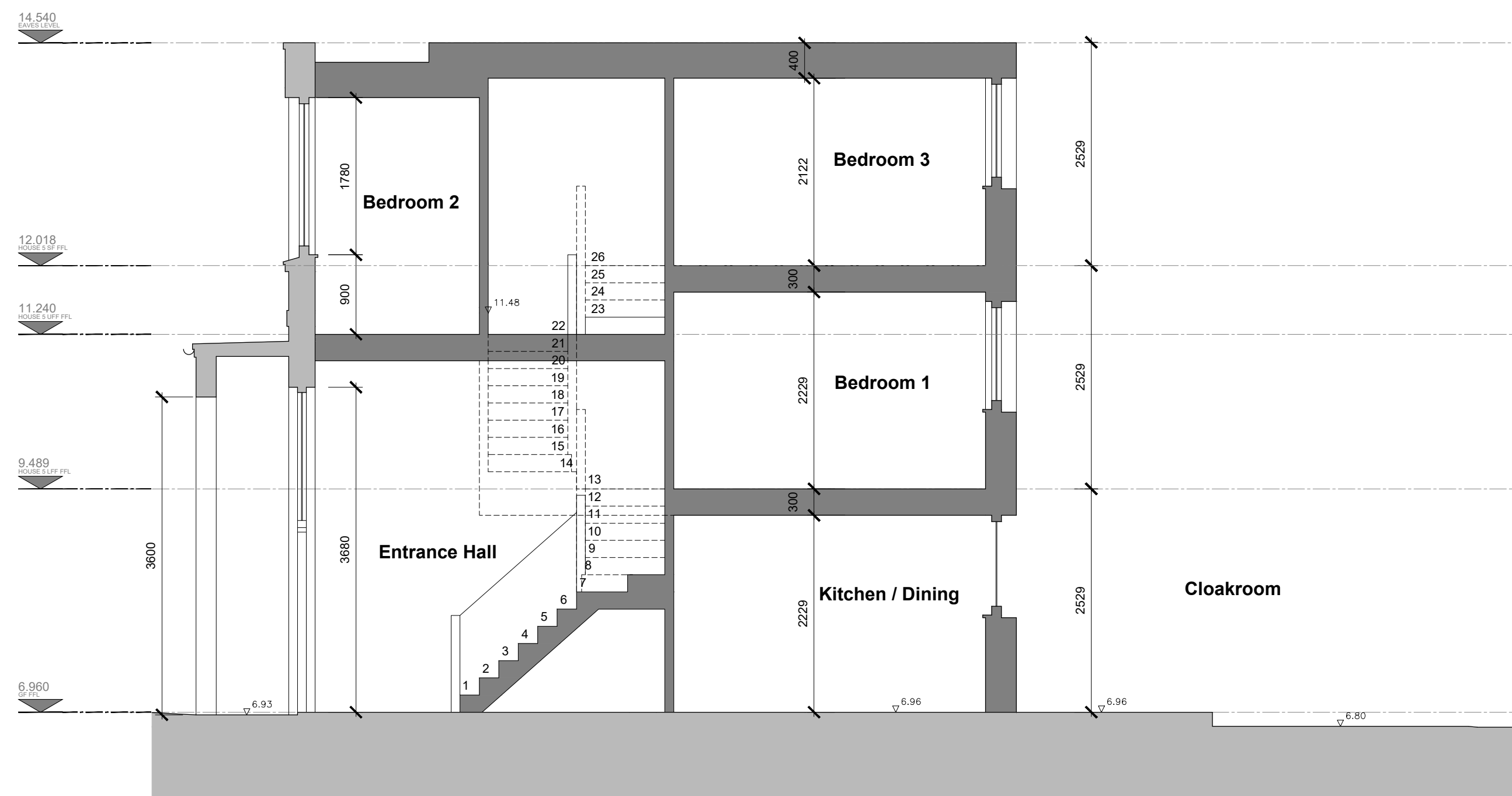
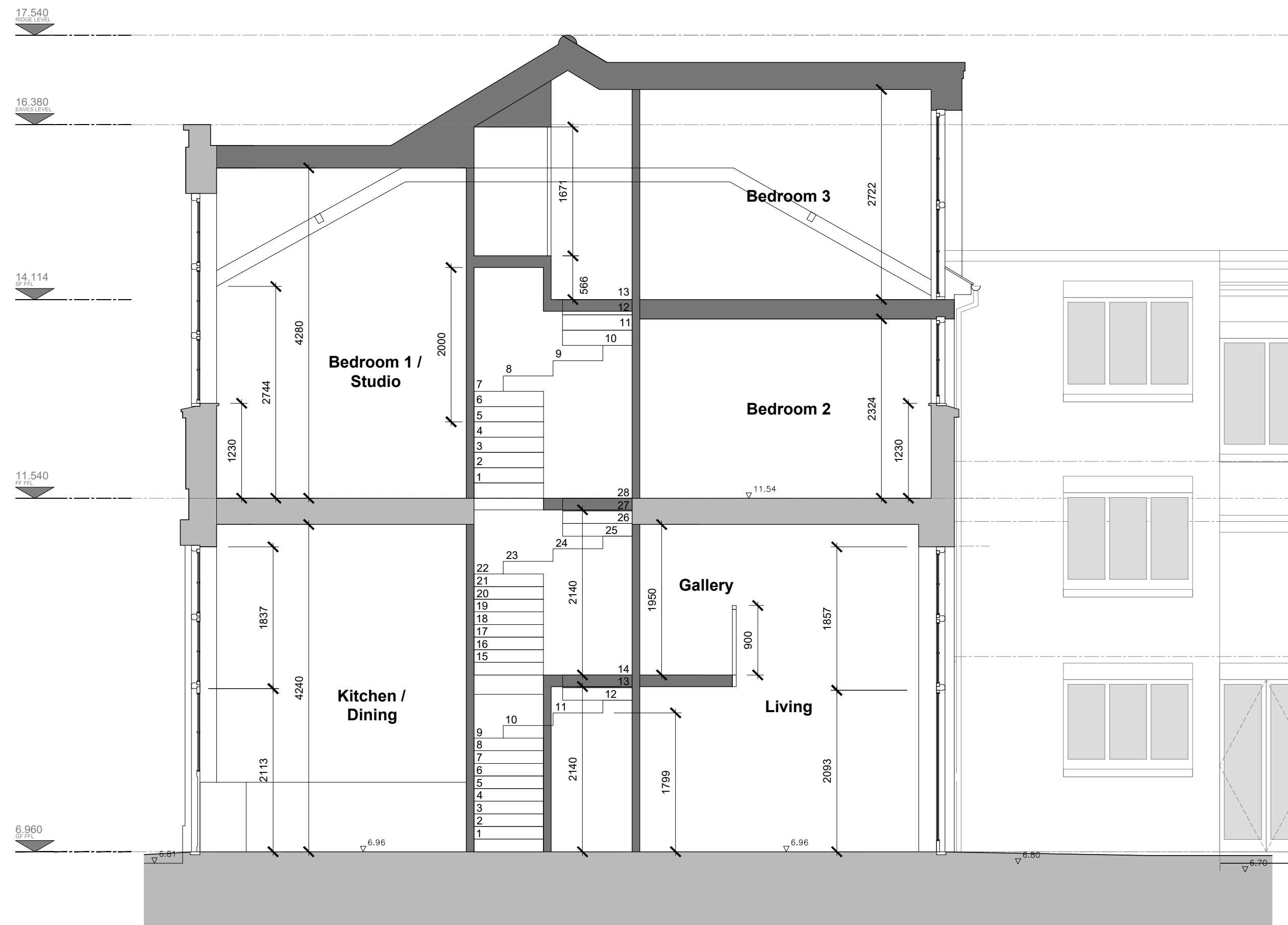
scale @ A1:
1:50

(31)001

drawing no.

revision

B



B	21/10/2025	Issued for information.	SP	PT
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/	28/08/2025	Issued for information.	SP	PT
rev. date	notes	drawn	checked	

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Information

drawn by: _____ checked by: _____
 SP _____ PT _____

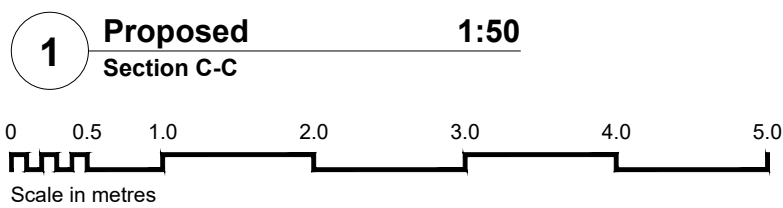
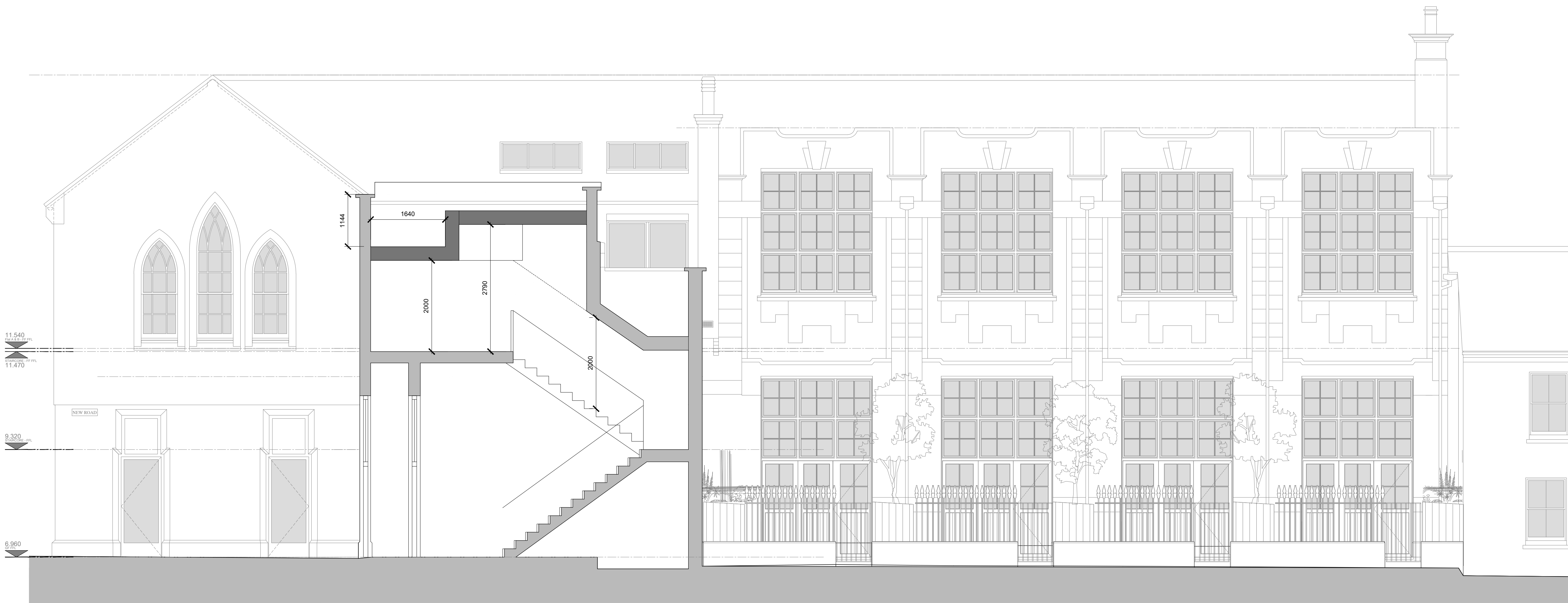
project north:

drawing title: Proposed
Sections AA & BB

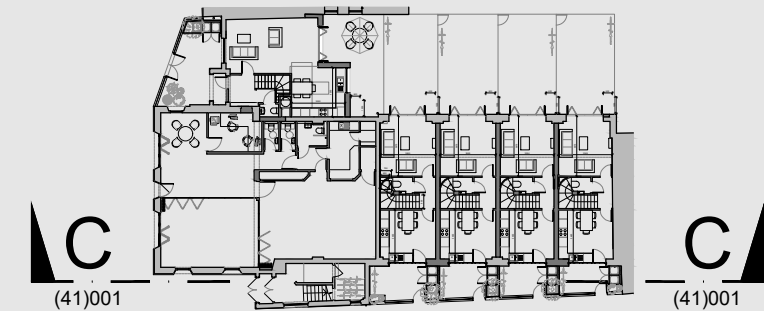
scale @ A1:
1:50

(41)000 B

drawing no. revision



key:



rev.	date	notes	drawn	checked
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issued for:
Information

drawn by:
SP

checked by:
PT

project north:

drawing title:
**Proposed
Section CC**

scale @ A1:
1:50

(41)001 /

drawing no. revision



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