Conservation Officer Comments
Amended Plans or Further Details

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Application Number:	AWDM/0926/26
Location:	39B Brighton Road, Worthing, West Sussex, BN11 3EF
Proposal:	Rear dormer extension, removal of rear chimney and rooflights to front roofslope (part-retrospective)
Case Officer:	Louise Prew

	Further Information Required
	Design Review Required
	No objection - no harm
	No objection - harm is negligible or mitigated
X	Objection - less than substantial harm
	Objection - substantial harm
	Objection – Total Loss

Site and Surroundings:	The application site comprises 39 Brighton Road, Worthing, BN11 3EF, a mid-terrace mixed-use property located on the northern side of Brighton Road within Worthing town centre. The building contains a ground-floor commercial unit, with residential accommodation above accessed separately from Brighton Road, together with rear access and parking served by the access route between Wyke Avenue and Warwick Gardens. The property is situated within the Steyne Gardens Conservation Area and forms part of a locally listed group of buildings; the Warwick Gardens Conservation Area lies to the rear, and the nearest listed buildings are Nos. 22–24 Brighton Road on the opposite side of the street. The surrounding area is characterised by a dense and varied town-centre townscape, with commercial frontages at ground-floor level and residential accommodation above. Brighton Road forms part of the A259 and includes a mix of late nineteenth- and early twentieth-century commercial and residential buildings, many of which display traditional rendered or brick elevations, shopfronts, bays, parapets, chimney stacks and slate or tiled roof slopes. The site is also close to Warwick Street, Steyne Gardens and the seafront, and therefore occupies a prominent and sustainable location within the wider town-centre context. The building has been subject to recent permissions relating to its repair, refurbishment and continued mixed commercial and residential use. The submitted information explains that areas of the building have deteriorated, with roof-level fabric affected by water ingress and structural concerns. In that context, the current proposal should be understood as part of the wider programme of works intended to secure the repair, occupation and long-term maintenance of the building. The application seeks planning permission for roof-level works comprising a rear dormer

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	extension, three conservation-style rooflights to the front roof slope, removal of a redundant rear chimney stack, and associated alterations to the internal arrangement of the upper-floor residential accommodation. The works would facilitate the conversion of the existing one-bedroom second-floor flat into a two-bedroom dwelling by making use of the roof space, while retaining the commercial use at ground-floor level and the wider mixed-use character of the property. From a conservation perspective, the principal considerations are the effect of the proposed roof alterations on the character and appearance of the Steyne Gardens Conservation Area, the setting of the nearby Warwick Gardens Conservation Area, the contribution made by the locally listed terrace, and any effect on the setting of nearby listed buildings. The following comments assess the proposal against the statutory duties contained within the Planning (Listed Buildings and Conservation Areas) Act 1990, relevant national policy, and the adopted Worthing Local Plan. Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant listed building consent, to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant planning permission, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when exercising planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area." The LPA's duties are reinforced within Section 16 of the NPPF, Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. As such, 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. Other elements held within Section 16 will also be considered as will Local Policy.
Comments:	The proposed rooflights to the front roof slope are not supported. Whilst described as conservation-style units, their siting high within the principal roof slope would make them visible within public views of the building and the wider terrace. Their number, placement and lack of suitable alignment with the established fenestration hierarchy below would

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	introduce a visually cluttered and discordant intervention into the front roof plane. This would erode the comparatively consistent appearance of the roofscape along this locally listed terrace and would fail to preserve the character and appearance of the Steyne Gardens Conservation Area. This aspect of the proposal is therefore considered to result in less than substantial harm to the significance of the designated conservation area and to the contribution made by the locally listed building group. The proposed rear dormer is also of concern. Although the rear elevation addresses a service road and views from Wyke Avenue and Warwick Gardens are partially obscured by the surrounding built form, the service road nevertheless forms part of the public realm and contributes to the setting of the adjacent conservation area townscape. The dormer would appear utilitarian in character and would not respond sympathetically to the prevailing Edwardian character of the area. By virtue of its scale, width and position, it would occupy a substantial proportion of the rear roof slope and would appear visually dominant within the rear roofscape. It is noted that no comparable dormers are currently in place along this terrace, and the introduction of such a feature would erode the cohesion of the roofscape, which makes an important contribution to the townscape merit of the group and to its significance as a locally listed building. The associated removal of the rear chimney would further erode the traditional roof form and architectural character of the building. It is also unclear why such a substantial alteration is required to accommodate a single additional bedroom, when less harmful alternatives, such as rear rooflights or a smaller and more sympathetically detailed dormer, could provide adequate light and usable accommodation while better preserving the character and appearance of the building and wider conservation area. In summary, the proposal is considered to cause less than substantial harm to the character and appearance of the Steyne Gardens Conservation Area and to the significance of the locally listed terrace. The harm arises from the cumulative effect of the front rooflights, the visually dominant rear dormer and the removal of the rear chimney, each of which would erode the traditional roofscape, diminish the cohesion of the terrace and introduce alterations that are not sufficiently sympathetic to the identified Edwardian and historic townscape character of Brighton Road and its rear setting. The benefits of creating a single additional bedroom are acknowledged, as is the general desirability of securing the repair and continued occupation of the building. The repair of the deteriorated roof fabric is supported in principle; however, the submitted scheme has not demonstrated that the proposed extent of roof-level alteration is necessary to secure that repair or to provide acceptable residential accommodation. The creation of one additional bedroom is principally a private residential benefit and, in the absence of clear evidence that less harmful alternatives have been fully explored, does not outweigh the identified less than substantial harm to the conservation area and the locally listed building group. The proposal would therefore conflict with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. The proposal would also fail to satisfy the relevant historic environment policies of the

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	National Planning Policy Framework, including Policies HE4 and HE5 in respect of heritage assets generally; Policy HE6 in respect of the designated Steyne Gardens Conservation Area; Policy HE7 in respect of the locally listed building group as a non-designated heritage asset; and Policy HE9 in respect of development within or affecting the significance of the conservation area. The proposal is also contrary to Policy DP3 of the National Planning Policy Framework, as the roof alterations would not respond positively to the history, character, features and setting of the site and would fail to maintain a strong and coherent local identity. At local level, the proposal is contrary to Policy DM24 of the Worthing Local Plan 2023. Policy DM24 requires development affecting designated and non-designated heritage assets to be of high quality, to respect its context, to preserve and enhance the character and appearance of conservation areas, and to sustain and enhance the significance of locally listed buildings. In this case, the proposal would not preserve or enhance the Steyne Gardens Conservation Area, would harm the roofscape cohesion of the locally listed terrace, and would fail to respond adequately to the guidance and sensitivities identified within the Steyne Gardens Conservation Area Character Appraisal.
Further comment 19/11/26	The amended proposals represent a positive response to the previous conservation comments. In particular, the removal of the proposed front rooflights is welcomed and addresses the objection to their effect on the principal roof slope and the appearance of the terrace. The removal of the rear chimney has been accepted on the basis of the submitted structural engineer's report. The report identifies significant leaning, deterioration of the mortar and brickwork, and associated water ingress, and recommends dismantling the stack to below roof level. Its loss is regrettable in heritage terms, but is considered justified in these circumstances. Whilst the reduction in the size of the rear dormer is acknowledged and welcomed, it remains, in my assessment, too dominant within the rear roof slope. Its scale and proportions would continue to detract from the traditional roof form and the cohesion of the locally listed terrace, to the detriment of the character and appearance of the Steyne Gardens Conservation Area. A further reduction is required to achieve a more proportionate and subordinate addition, retaining a greater extent of uninterrupted roof slope around the dormer. Rooflights would be preferred The amendments therefore reduce, but do not fully overcome, the previously identified heritage harm. An objection remains on conservation grounds, confined to the scale and dominance of the rear dormer. The remaining harm to the significance of the conservation area is considered less than substantial, and further amended drawings are requested to address this outstanding concern.

Simon Richard
Conservation Consultant for and on behalf of Adur and Worthing District Council
Date of Comment 27/8/26

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