

Conservation Officer Comments
Amended Plans or Further Details

**Architectural & Historic
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Application Number:	AWDM/0710/26
Location:	Site Of And Land At St Marys Church Hall 25 East Street And 1 And 1A New Road Shoreham-by-sea West Sussex
Proposal:	Approval of Details Reserved By Conditions 3 (written scheme investigation) 4 (archaeology) 5 (cycle parking) 6 (site set up) 7 (drainage details) 8 (drainage management) 9 (materials) 10 (bin store details) 12 (sound insulation and ventilation) of approved application AWDM/0082/26.
Case Officer:	Peter Barnett

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

Comments:	In respect of conditions 3,4,5,6,7,8,9,10 and 12 of AWDM/0082/26. The decision notice states: 03. No groundworks of any kind shall take place until a programme of archaeological monitoring has been secured in accordance with a Written Scheme of Investigation which has been submitted by the applicant, for approval by the Local Planning Authority. 04. A final archaeological report or (if appropriate) a Post Excavation Assessment report shall be submitted to the Local Planning Authority for approval within 6 months of the date of completion of the archaeological fieldwork unless otherwise agreed in advance by the Local Planning Authority. 05. No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority. 06. No development shall be commenced until such time as plans and details have been submitted to and approved in writing by the Local Planning Authority showing the site set up during construction. This shall include details for all temporary contractor's buildings, plant and stacks of materials, provision for the temporary parking of contractor's vehicles and the loading and unloading of vehicles associated with the implementation of this development. Such provision once approved and implemented shall be retained throughout the period of construction.
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07. Construction shall not begin until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must prioritise the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and demonstrate no increase in flood risk as a result of the Proposed Development with sufficient supporting evidence provided to support its viability including supporting calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100) plus climate change critical storms. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

08. The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include: I. A timetable for its implementation. II. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located. III. A management and maintenance plan for the lifetime of the development which shall include details of design life and the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

09. No development shall be carried out unless and until a schedule of materials and finishes to be used for the external walls, roof, railings, windows, doors, rooflights and boundary treatment has been submitted to and approved in writing by the Local Planning Authority and the development shall be completed in accordance with the approved schedule.

10. The development shall not be occupied until the associated facilities for storing refuse and waste, including for waste that can be recycled, have been provided in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

12. Notwithstanding the submitted Noise Impact Assessment, the development shall not commence until final details of sound insulation and ventilation measures have been submitted to and approved in writing by the local planning authority. The development shall not be occupied until the measures have been installed in accordance with the approved details.

In heritage terms, conditions 3 and 4 are directly relevant insofar as they relate to archaeological investigation, monitoring and reporting. Condition 9 is also directly relevant, as the submitted materials and finishes have the potential to affect the character, appearance and significance of the site and its wider historic context.

	Condition 6 may be relevant where the proposed construction set-up, storage, access arrangements or temporary works could affect historic fabric, archaeological remains, townscape character or the setting of heritage assets. Conditions 5, 7, 8, 10 and 12 are not primarily heritage matters; however, they may require conservation consideration where the submitted details would introduce visible external works, affect historic fabric, alter the appearance of the development, or have implications for the setting of nearby heritage assets. With regard to Condition 3, the submitted Written Scheme of Investigation for an archaeological watching brief is considered acceptable in principle and there is no heritage objection to the discharge of this condition, subject to agreement from Place Services as the Council's archaeological advisor. The document sets out an appropriate methodology for archaeological monitoring during groundworks, including provision for recording, reporting, artefact recovery, environmental sampling and archive deposition. Condition 4 should remain open at this stage, as it requires the submission of a final archaeological report, or Post Excavation Assessment report if appropriate, following completion of the watching brief. This matter can therefore only be addressed once the archaeological fieldwork has been undertaken and the resulting report has been submitted to the Local Planning Authority for approval. In respect of Condition 5, the submitted details indicate that the cycle storage would either be accommodated within the building or located within private rear garden areas. On this basis, and given that the external cycle storage would be secluded and out of public view, the proposed cycle storage arrangements are considered acceptable in heritage terms. No objection is therefore raised to the discharge of Condition 5 from a conservation perspective. In respect of Condition 6, the site set-up arrangements relate to temporary construction-phase activity only. Given their temporary nature, these matters are not considered to be of direct heritage relevance and no conservation objection is raised to the discharge of Condition 6. In respect of Condition 7, the submitted drainage details are not considered to be of direct heritage relevance. The only potential heritage consideration relates to the overall appearance of any permeable surface finishes associated with the drainage strategy. This matter is more appropriately considered under Condition 9, which relates to materials and finishes. No conservation objection is therefore raised to the discharge of Condition 7 subject to approval of conditions 3 and 4. In respect of Condition 8, the submitted drainage maintenance and management details are not considered to be of heritage relevance. No conservation objection is therefore raised to the discharge of Condition 8 subject to approval of conditions 3 and 4. For clarity, any groundworks associated with the approved drainage scheme should remain subject to the archaeological safeguards secured under Conditions 3 and 4. Acceptance of the drainage details from a conservation perspective should not be taken to override the requirement for archaeological monitoring during relevant groundworks, nor the subsequent submission of the final archaeological report, or
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	Post Excavation Assessment report if appropriate, following completion of the watching brief. In respect of Condition 9, the proposed reuse of existing bricks is supported in heritage terms, as this will assist in maintaining visual continuity with the existing building and its historic context. The proposed Imperial Reclamation Weathered Soft Red brick is also considered acceptable, subject to appropriate detailing and workmanship, as its colour, texture and weathered character are considered compatible with the character and appearance of the site and its wider historic setting. The use of SSQ Del Carmen natural slate is accepted in heritage terms. The use of lead sheet for the front dormer roofs is also accepted. The use of a polymeric single ply membrane system for the rear dormer roofs is accepted, given the context of those roof elements and the distance between the building and sensitive heritage assets. The proposed conservation rooflights by The Rooflight Company are accepted in heritage terms. The use of a lime render to the East Street elevation is accepted in principle; however, further details are required regarding the lime mix to be used, the type of lime proposed, and the final finish and colour. No specific details have been provided for the proposed permeable paving, notwithstanding that its appearance has potential to affect the character and appearance of the site and its wider historic setting. Details of the proposed permeable paving, including material, colour, finish, laying pattern and edging treatment, are therefore required before this aspect of Condition 9 can be accepted. However, the proposed colour no. 5, 'Brick', is not considered acceptable for application to a rendered surface. The colour is too strong and would undermine the more cohesive relationship between the building and the neighbouring buildings which form the terrace along East Street. Given the building's position within the immediate setting of a Grade I listed building, the use of such a strong colour would give the rendered elevations an overly dominant character and would detract from the setting of that designated heritage asset. This element should therefore be reviewed and an alternative, more recessive colour proposed. It is not clear from the annotations on drawing 51 whether the existing windows are to be refurbished or replaced. The use of double glazing would not constitute a like-for-like repair, and the section shown on the drawing does not appear to accord with the elevation. While this aspect may be acceptable in principle, clarification is required before the window details can be accepted. In relation to the railings, the detail included within the submitted document is too vague to allow a proper assessment of their heritage impact. Large-scale drawings are therefore required, preferably comprising 1:10 elevations and 1:2 sections showing the proposed railings and dwarf wall, including materials, profiles, junctions and fixing details. In the interests of clarity, the use of close-boarded fencing by way of concealment may be acceptable to the rear; however, there is no specific detail showing where
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	such fencing would be located. There is also no clear detail regarding the proposed East Street boundary treatment. Further clarification is therefore required in respect of the boundary treatments before this aspect of Condition 9 can be accepted. In respect of Condition 10, given that the location of the refuse and waste storage facilities has already been approved, the proposed approach is considered reasonably subtle. The use of timber is appropriate in this context and the bin store details are therefore accepted in heritage terms. No conservation objection is raised to the discharge of Condition 10. In respect of Condition 12, the proposed ventilation details have not been clearly specified in terms of the location of the vents. A simple annotated roof plan identifying the position of the proposed vents would be sufficient to clarify this matter and allow the heritage implications, if any, to be properly considered. In conclusion, no conservation objection is raised to the discharge of Conditions 5, 6, 7, 8 and 10. Condition 3 is acceptable in principle, subject to agreement from Place Services, while Condition 4 should remain open until the archaeological watching brief has been completed and the required final archaeological report, or Post Excavation Assessment report if appropriate, has been submitted. In respect of Condition 9, a number of the proposed materials and finishes are acceptable in heritage terms, including the reuse of existing brick, Imperial Reclamation Weathered Soft Red brick, SSQ Del Carmen natural slate, lead sheet to the front dormer roofs, the polymeric single ply membrane system to the rear dormer roofs, and conservation rooflights. However, further information and/or review is required in relation to the proposed render colour, lime render specification, permeable paving details, window details, railing and dwarf wall details, and boundary treatments. Condition 12 also requires clarification by way of a simple annotated roof plan showing the proposed vent locations before this aspect can be fully accepted from a heritage perspective.
Further comment 27/8/26	In respect of Condition 4, the previously stated position is maintained. The condition expressly requires the submission of a final archaeological report, or, if appropriate, a Post Excavation Assessment report, within six months of completion of the archaeological fieldwork, unless otherwise agreed in advance by the Local Planning Authority. It is therefore not a condition which can ordinarily be discharged in advance of the archaeological fieldwork having been undertaken and the resulting report having been prepared and submitted. The information submitted by the applicant may demonstrate that arrangements are in place for archaeological reporting; however, that is not the same as satisfying the specific requirement of Condition 4, which relates

to the submission and approval of the final archaeological reporting output following completion of the fieldwork.

If the Council, following consultation with its archaeological adviser, is satisfied that the applicant's alternative approach is acceptable, then it may determine that the submitted information is sufficient for the purposes of the condition. However, in the absence of such confirmation, Condition 4 should remain open. Alternatively, the applicant should withdraw Condition 4 from the current discharge of conditions application until such time as the archaeological fieldwork has been completed and the required final archaeological report, or Post Excavation Assessment report if appropriate, can be prepared and submitted for approval.

In respect of condition 9 materials, further correspondence has clarified that the elevation of House 5 was originally brick and was painted cream relatively recently, during the late twentieth century. It is understood that the proposed 'brick' paint colour is intended to reinstate something closer to the original tone of the façade. However, a uniform painted finish would not replicate the visual character of brickwork, which derives not only from colour, but also from the relief, texture, tonal variation, mortar joints and other subtle details of the façade.

Following a site visit, it is also unclear whether the cills, copings, keystones and areas of render or stucco were originally brick, or whether they were formed in, or finished to resemble, a contrasting stone-type material. Given the period and architectural treatment of the building, it is quite possible that these elements were intended to read differently from the brickwork, although this has not yet been confirmed.

Within the wider setting, the proposed 'brick' paint colour would therefore not provide a convincing reinstatement of the appearance of brickwork.

Rather, by virtue of its constant, unbroken and relatively strong colour, it would introduce a visually dominant painted finish in a context where surrounding painted elevations are generally more modest and pastel in tone. As such, when considered against the prevailing colour palette of East Street and the sensitive setting of the Grade I listed church, the proposed finish would not satisfactorily complement its context.

The applicant should therefore either investigate whether the original brick façade can be carefully exposed, cleaned using an appropriate conservation method such as DOFF or similar, and repaired with replacement bricks where necessary, or alternatively propose a more modest and contextually appropriate paint colour for the façade.

In respect of the East Street Building the refinishing of the upper storey stucco in a smooth ashlar scored lime render is accepted

In respect of windows, I have referred back to drawing 1094(51)000 Rev B, which details the proposed approach to the windows and doors in respect of the bay facing onto New Road, and have also considered the points raised in the agent's most recent correspondence. There is no objection to the intention to replicate the Edwardian sections evident on the building's existing joinery, nor is there an objection in principle to the installation of double glazing.

However, where replacement joinery is proposed in a sensitive historic context, it is usual to require detailed joinery drawings comprising 1:10 elevations and 1:2 sections. This level of detail is necessary to confirm the quality, proportions, moulding profiles, glazing arrangement, depth of reveal, relationship between fixed and opening lights, and the overall appearance of the proposed installation for each and every window. These details are particularly important where the existing joinery contributes positively to the character and appearance of the building and its wider historic setting.

It is acknowledged that compliance with modern Building Regulations, including requirements relating to protection from falling, collision and impact, and the conservation of fuel and power, can influence the detailed design of replacement windows and doors. However, Parts K and L of the Building Regulations allow a degree of flexibility in relation to historic buildings and buildings within conservation areas, where strict compliance would unacceptably affect character, appearance or special architectural interest. In such cases, the objective should be to achieve a reasonable balance between performance, safety and the conservation of historic significance. This is relevant in terms of glazing thickness which directly influences the size of joinery sections.

In conservation terms, the priority is to ensure that the replacement joinery maintains good proportions, appropriate frame and glazing-bar profiles, and a high-quality appearance which reflects the Edwardian character of the existing building. The principle of replacement timber joinery and double glazing may therefore be acceptable, but this should be confirmed through appropriately scaled details before this aspect of Condition 9 is discharged.

Conservation defers to the planning officer's decision in respect of this matter.

Similarly, in respect of the proposed railings as detailed on drawing 1094(31)010 Rev B, the general appearance of the railings is accepted. However, as with the replacement joinery, it is usual for 1:10 elevations and 1:2 sections to be provided in order to confirm the quality, proportions, profile, fixing detail and overall appearance of the proposed installation. This level of detail assists in ensuring that new railings are not overly modest in their design or construction, and that they convey a suitable degree of substance and proportion within the historic street scene.

	In this instance, it is noted that such detailed drawings were not specifically required by the wording of the condition and that the general appearance of the proposed railings is considered acceptable in conservation terms. On that basis, the matter is not pursued as a conservation objection and the decision regarding the overall acceptability of the submitted railing details is deferred to the Council. In respect of boundary treatments, the agent states that close-boarded fencing will be used to delineate the garden boundaries of the houses, that the East Street boundary is delineated by railings, and that all other boundary walls are existing and retained. However, the submitted railing details appear to propose railings along the New Road frontage. In that context, the introduction of close-boarded fencing between the units on the principal frontage areas would introduce an additional boundary treatment which would not complement the prevailing character or the proposed formal frontage treatment. Having reviewed the previously approved drawings and the submitted 31, 41 and 21 series drawings, it is not sufficiently clear where the close-boarded fencing is proposed to be located. There is no conservation objection in principle to the use of close-boarded fencing to the rear of the New Road houses, where it would perform a domestic garden-separation function and would have limited impact on the public realm. However, clarification is required in respect of any proposed close-boarded fencing to the front elevation, frontage areas, bin-store areas or other publicly visible parts of the site. This matter should therefore be clarified before the boundary treatment element of Condition 9 is discharged. In respect of condition 12 the amended drawing shows only one annotation but it is unclear if only one is proposed. If the intention is to place numerous vents to each side of every dormer this will only be supported where they are fully obscured from view, otherwise relocation of such vents to the rear should be considered. In summary, further information is required before the relevant outstanding matters can be accepted in conservation terms. In respect of Condition 4, either the Council should confirm, following consultation with its archaeological adviser, that the applicant's alternative approach is acceptable, or the applicant should withdraw Condition 4 from the current discharge application until the archaeological fieldwork has been completed and the required final archaeological report, or Post Excavation Assessment report if appropriate, can be prepared and submitted. In respect of Condition 9, clarification and/or further details are required in relation to the proposed House 5 façade colour treatment, including whether
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	the original brickwork can be exposed, cleaned and repaired, or whether a more modest and contextually appropriate alternative paint colour should be proposed. Clarification is also required regarding the location of any close-boarded fencing, particularly in relation to the front elevation, frontage areas, bin-store areas and other publicly visible parts of the site. Although the general appearance of the replacement windows, doors and railings is accepted in principle, appropriately scaled details would ordinarily be expected to confirm the quality, proportions, profiles, sections, fixing details and overall appearance of the proposed installations. As these matters were not specifically required by the wording of the condition, conservation defers to the Council and the planning officer in respect of whether the submitted level of detail is sufficient for discharge.
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Simon Richard

Conservation Consultant for and on behalf of Adur and Worthing District Council

Date of Comment 27/8/26