

Conservation Officer Comments
Amended Plans or Further Details

**Architectural & Historic
Buildings Consultants**

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Application Number:	AWDM/0118/26
Location:	9 Warwick Road Worthing West Sussex BN11 3ET
Proposal:	Application for Listed Building Consent for internal changes including new staircase to basement, walls to utility, chimneys opened up, removal of ground floor wall and creation of front door lobby, sliding door at first floor, second floor bathroom and removal of walls and external enclosure of part of second floor balcony to create orangery
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:	9 Warwick Road is a early 19th century mid terrace property arranged over 4 floors and finished in a smooth stucco under a slate roof. The building possesses a fine level of architectural quality with the entrance steps rising to a 6 panel door with architrave detailing set around the door aperture which also hosts a fanlight above. The first floor possesses a cantilevered balcony with canopy which is consistent along the whole terrace, with the second floor being a more modest affair hosting 2 3 over 6 sliding sash windows before the elevation terminates with a parapet. The final level is a subterranean level accessed both via an external set of steps and an internal access. Internally although slightly amended the building retains its plan form of 2 rooms set back to back on each floor being accessed by a consistent staircase arrangement that rises up the building. A minor outshot to the rear provides bathroom and kitchen facilities as relevant to each floor. The significance of the terrace and no 9 is derived from high aesthetic and historic values, being an example of the early speculative developments of the Georgian and Regency period along the south coast, which included similar developments in Brighton, Portsmouth and Hastings. This extends to not only external appearance but also the internal arrangement of no9 The proposal seeks Listed Building Consent for a number of works that include the installation of a new staircase to basement, the removal of walls to utility, the chimneys opened up (being the breast is removed and hollowed out), removal of ground floor wall and creation of front door lobby, sliding door at first floor, second floor bathroom and removal of walls and external enclosure of part of second floor balcony to create orangery. Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a
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	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. It should also be noted that the restrictions and requirements of listed building consent apply to the building in its entirety, whether that be internal or external, with legislation referring to preservation of architectural and historic interest. 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. In respect of the stairs to the basement level, it was noted during the site visit that these particular stairs were later replacements and not particularly well constructed. The principle of replacing these stairs is acceptable but would be subject to conditions for large scale and highly detailed joinery drawings. However much if not all of the other aspects are considered to seriously erode the character of the early 19th century building and is wholly unacceptable. Much of the proposed relates to the removal of walls and the formation of new spaces by rearranging internal partitions. In respect of all of these aspects within the proposed, they would result in a serious erosion of plan form of the building. As Historic Englands advice note 2 states: <i>The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.</i> In this particular instance the plan form has been largely retained and is still legible contributing to historic character and sense of place, when considering this against legislation the proposed removal of walls will not preserve architectural or historic interest, nor where the proposed causes less than substantial harm, is there an adequate mitigation
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	that is clear and convincing or in the public interest. Moreover the removal of the walls could have unforeseen impacts upon the structure given that many buildings of this period are regarded as quite flimsy. Similarly the removal of the façade that forms the chimney breast at basement level (supporting legs will remain) to merely accommodate a cupboard is harmful and wholly unacceptable. If storage is required, perhaps considering an understairs arrangement at basement level. The removal of chimney breasts is without justification or public benefit and is unacceptably harmful. In reference to the proposed orangery, where it makes use of a more modern element, it is in a considerably elevated position and is not of a realistically practical size, whereas the harm in heritage terms may only be modest, other planning matters may make it unacceptable. Given the majority of the proposed causes unjustified harm to the building, the council should not consider amendment but issue a clear refusal of Listed Building Consent. The proposal does not consider the architectural and historic interest of the building adequately and subsequently a scheme that is wholly contrary to the duty to preserve has been proposed. Turning to local policy, DM24 of the Worthing local plan requires proposals to be of a high quality, respecting its context and demonstrating a strong sense of place. It goes on to state that development should not adversely affect heritage assets or its setting (including important views that contribute to its setting). Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, the Council will 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. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Where proposals may result in harm to a designated asset a Heritage Impact Assessment (HIA) must be submitted describing the significance of any heritage assets affected, including any contribution made by their setting. It also makes clear that Planning permission and/or Listed Building consent will only be granted provided that the appearance, significance, or historic character of the Listed Building is not adversely affected. Therefore it is clear that the proposal fails to accord with that policy. In conclusion and having regard to Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the proposal by virtue of design, appearance, loss of plan form and loss of historic fabric and features would not preserve the architectural and historic interest of the Grade II Listed Building and fail to comply with policy DM24 of the Worthing Local Plan and paragraphs 135, 213 and 215 of the NPPF. The decision has been issued in accordance with paragraph 139 of the NPPF which states that: Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning
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	documents such as design guides and codes.
Drawing Errors:	
Design Review:	
Amended Plans / Additional Information Required: <i>[List the amended plans/additional information you are requesting, if any]</i>	1. 2. 3.
Conditions Required: <i>[List the conditions you are requesting, if any]</i>	1. 2. 3.

Simon Richard

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

Date of Comment 12/3/26