

# Comments for Planning Application AWDM/0508/26

Reps and Consults



planning@adur-worth      Mon 11 May, 23:02 (2 days ago)

to me

## Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11/05/2026 11:02 PM from Ms M Saabye.

### Application Summary

|               |                                                                                                                                                                                                                                                                          |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Address:      | 22 - 26 High Street Shoreham-by-sea West Sussex BN43 5DA                                                                                                                                                                                                                 |
| Proposal:     | New plant on flat roof to replace existing within new 2m high timber enclosure. New steel supports for plant and raised walkway. Existing roof light to be removed and infilled. New steel CAT ladder up to plant area (Amendment to approved application AWDM/0919/25). |
| Case Officer: | Peter Barnett                                                                                                                                                                                                                                                            |

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### Customer Details

|          |                                              |
|----------|----------------------------------------------|
| Name:    | Ms M Saabye                                  |
| Email:   |                                              |
| Address: | 11 Church Street Shoreham-by-sea West Sussex |

### Comments Details

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|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commenter Type:      | Neighbour                                                                                                                                                                                                                                                                                                                                                                                   |
| Stance:              | Customer objects to the Planning Application                                                                                                                                                                                                                                                                                                                                                |
| Reasons for comment: | - Other                                                                                                                                                                                                                                                                                                                                                                                     |
| Comments:            | I strongly object to this retrospective application. The development fails to preserve or enhance the character and appearance of the Shoreham-by-Sea Conservation Area and is in conflict with the Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008), The Adur Plan 2017-2032, and the National Planning Policy Framework (December 2024), NPPF. |

On 5 August 2025 I was sent a letter from the Head of Planning & Development

seeking my views on ADWM/0919/25 which was a planning application from the Co-op asking to put a 'New plant on flat roof to replace existing within new timber enclosure and emergency lighting.' Based on the drawings and information supplied, I formally objected to this planning application, citing Adur Council's Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008) which states that the council will "resist applications for extensions or new buildings which are unsympathetic to the character of the conservation area."

The council approved ADWM/0919/25 on 9 October 2025. The Delegated Officer Report justified this approval saying "... the Church Street elevation is set back and is unlikely to be visible from the street itself. ... the proposed fencing is to be painted mid-grey to attempt to reduce its visual impact. In the circumstances the harm identified is considered to be less than substantial and weighed against the public benefits of upgrading the plant of an established high street shop to secure its optimum viable use, it is considered to be an acceptable development."

In November 2025, an enormous industrial unit on huge iron girders appeared on the roof above Grade II listed buildings nos 9 and 11 Church Street, which was absolutely unsympathetic to the character of the conservation area, and much taller than the council gave permission to build. Under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special attention to the desirability of preserving or enhancing the character or appearance of the area is a statutory duty, not a discretionary consideration. The development manifestly failed this test.

In January 2026, my husband and I registered a formal enforcement complaint using Adur Council's online form. The Co-op's breaches were:

1. Failure to follow approved plans - the structure did not resemble in vital particulars the drawings supplied on the plan.
2. Failure to supply complete, accurate - or indeed any - drawing of the side elevation, thus making it impossible for planning officers, councillors, and neighbours to make informed decisions about the material harmful effects of the new structure on neighbouring listed buildings.
3. Failure to complete work within prescribed period/ignoring specific requirements of planning approval (to paint structure within seven days).
4. Failure to replace existing structure with similar, as specified in Supporting Statement 93080 of 16 July 2025.

#### Harm and effects

The material damage and harmful effects of the Co-op's failure to supply proper drawings is that we, as neighbours occupying two adjacent listed buildings, were unable to make informed decisions about this enormous structure. The unsightly design, bulk, and character of the new construction clashes significantly with the existing character and appearance of the conservation area. Moreover, it has dramatically, suddenly, and radically curtailed sunlight into the gardens of the two neighbouring listed buildings, one of which it now dominates and greatly overshadows, as it does the area around it.

At nearly seven feet tall, this overbearing new structure is much too high and out of scale with the conservation area in which it stands, and we objected to the proposal on these grounds before Planning approved it; but it is in fact much worse than we were led to believe. The absence of a complete set of drawings meant that we were never shown what it would look like, nor the effects it would

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have on reducing sunlight into our gardens. It is certainly impossible to make informed decisions from a drawing which does not exist.

On the 28 April, I received the Co-op's planning application AWD/0508/26. This retrospective planning application is at fault again. Like the earlier application, the absence of a complete set of drawings fails to show the true scale of the new plant and its effects on Shoreham-by-Sea's conservation area and my home.

This planning application should be rejected for the following reasons - it:

1. Fails the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character and appearance of the conservation area.

2. Is contrary to the Adur Local Plan (2017) policies on design and heritage Policy 15:

- 'Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features, landscaping and layout of the development.'

- Policy 16:

"The Council will conserve and enhance the historic environment and character of Adur, which includes historic buildings, features, archaeological assets and their settings. Where development affecting any heritage asset is permitted, it must be of a high quality, respecting its context and demonstrating a strong sense of place."

3. Fails to comply with the adopted Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008) on both massing/design and materials.

- The structure is bulky and presents blank, unrelieved elevations. It makes no architectural contribution to the conservation area and demonstrably fails statutory tests. Retrospective consent should not be granted for development that replicates and entrenches the very failings that the strategy was adopted to address.

4. It curtails light - the unsightly design, bulk, and character of the new construction clashes significantly with the existing character and appearance of the conservation area. Moreover, it has dramatically, suddenly, and radically curtailed sunlight into the gardens of the two neighbouring listed buildings, one of which it now dominates and greatly overshadows, as it does the area around it.

5. Defeats the purpose of the Article 4 Direction in force in or adjacent to this location. - The Co-op cannot now seek to regularise, retrospectively, works that would almost certainly not have been permitted had they been properly submitted in advance.

6. Was carried out without consent and without pre-application engagement - this weighs heavily against its retrospective approval.

- One of the Co-operative Group's, principal values is "Concern for the Community". Going ahead with unauthorised development in a designated conservation area, without proper consultation, is in direct conflict with that value and with the reasonable expectations of all in Shoreham-by-Sea's community.

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