From: Bartlett, Clare <Clare.Bartlett@DMHStallard.com>
Sent: 11 May 2010 11:17
To: teamp13@pins.gsi.gov.uk
Cc: saskar1056@aol.com; yjosef@josefwhiteman.com; Hannah Barker
Subject: APP/Y3805/E/10/2124627/NWF AND 2124620 - Norfolk House, Shoreham by Sea
Attachments: 7228393.pdf

Dear Ms Whitworth

Please find attached our response to the Council's Appeal Statement.

Could you please confirm safe receipt.

Thanks,

Clare

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AAP/Y3805/A/10/2124620/NWF & AAP/Y3805/E/10/2124627/NWF

Norfolk House, High Street, Shoreham by Sea

Response to Adur District Council's Appeal Statement

Impact on Character and Appearance of the Conservation Area

The main distant 'waterfront' view of the proposed development would be from Norfolk Bridge where the Ropetackle, and in particular the 'contemporary element' referred to in the Council's appeal statement, is particularly prominent. The proposed development is considered to be entirely in keeping with the contemporary style of the Ropetackle, yet certainly not as dominant in terms of scale or design due partly to the raised ground on the northern side of Norfolk Bridge.

This can be appreciated in the image below which shows the new Ropetackle development to the forefront of views into the Conservation Area. The proposed building is only slightly larger than Norfolk House which can be seen to the right of Norfolk Bridge on which the photograph was taken.



Source: Google Maps

Whilst it is correct that the Ropetackle is not within the Conservation Area, it is immediately adjacent to it and therefore affects the setting of it. The planning authority

would therefore have considered the impact of the development on the designation, and considered whether such a contemporary design of the scale shown in the image above would adversely affect the setting of it. In granting planning permission for it, the planning authority clearly considered it to be an acceptable scheme in terms of design and scale. The proposed development would help 'balance' the setting of the Conservation Area particularly when viewed from Norfolk Bridge.

In terms of the impact the proposed development would have on the Conservation Area, the Council's Appeal Statement contradicts the advice given by the Council's Conservation Architect, the Adur District Conservation Advisory Group, English Heritage and the Case Officer all of whom support the scheme and consider it to enhance the Conservation Area. There is no information or professional assessment within the Council's Appeal Statement to explain why a different view is now being taken.

The Council also claim that the proposed building would have an adverse impact on the south-east view of the Ropetackle centre. However, the difference the proposed building would make would be insignificant due to the similar scales of the existing and proposed buildings. It is our consideration that the proposed building would create a more harmonious view from this direction than Norfolk House which appears discordant.

The Council's Appeal Statement criticises the proposed design of the High Street-side of the development. However, as discussed in the various meetings with the Council and in the design review meeting, the reason for the proposed design is that the High Street 'face' of this part of the site will be in the form of the future development of the existing Tanfastique shop which is not in the Appellant's ownership. The scheme has been design specifically to present an opportunity for an abutting future development which would complete the gateway to the appeal site.

In relation to materials and as noted in the Case Officer's report, the Appellant is willing to make changes to the materials proposed to accord with the recommendations of English Heritage if considered desirable and these can be dealt with by condition. However, it is important to note that the proposed design and materials reflect the

comments made by the Council's design officers during the pre-application consultation. The principal materials used, brick and render, are both the main characteristic finishes in the Shoreham area, and the flint panels between the double window panels and the heavy stony base in comparison with the lighter upper section, make a contemporary use of another common material in Shoreham. Contrary to the Council's Appeal Statement, we would argue that English Heritage's comments acknowledge this but go on to suggest that more use of these materials should be made.

Residential Amenity

The Appeal Statement makes a number of statements about the impact the development would have on residents' amenity, but none of these claims are supported by any technical assessment of what the impact would be. The daylight assessment carried out by John Packer Associates (Appendix D of our Appeal Statement) confirms that the distance between the proposed building and the existing neighbouring buildings, together with the minor proposed increase in height, would ensure there would be no significant loss of light to existing properties.

The Council's Appeal Statement refers to the proposed building as being 'much higher', than Britannia House. The reality is the bulk of the building would be no higher than Britannia House (please refer to Drawing No. 0803-4-E-202) with the top recessed floor being 2.2m higher. Given the distances between the proposed and existing buildings, this cannot be said to be significant. The Case Officer's report refers to the building height being 'consistent and relative to the Ropetackle development' and no evidence has been provided within the Council's Appeal Statement to explain why an alternative view is now being taken.

The Appeal Statement refers to there being a 'limited distance' between the proposed building and Britannia House. There is also a suggestion that there would be a distance of 16 metres between the non-angled windows within the hotel building and the flats on the first and second floors of Britannia House. However, this distance only applies to windows within bedrooms on the first floor of the hotel which are at a lower level than the residential windows on the first floor of Britannia House, and windows serving a

stairwell which would most likely only be used in the event of a fire or other emergency. There would be a distance of at least 18.5 metres between the only other non-angled window which serve 4 hotel bedrooms on the second and third floors. This distance is significant given the town centre location, and is substantial enough to ensure a loss of privacy would not result.

In addition, there are far more windows in the northern elevation of Norfolk House as existing which look towards Britannia House so the proposed development needs to be considered against what the existing situation is. We consider there to be no significant increase in overlooking for the reasons explained above.

Comprehensive Redevelopment of the Site

The Council's Appeal Statement provides no reasonable explanation as to why the appeal site should only be developed as part of a wider scheme. Britannia House, which the Council claims should be included in the redevelopment plans, comprises a mixture of commercial and residential properties all in a variety of different ownerships and with varying lengths of leases in place. It is extremely unlikely that the entire site would be available for redevelopment within a reasonable timescale.

Car Parking

The Council's consideration of the proposed car parking provision in its Appeal Statement is based on an incorrect number of parking spaces. 17 car parking spaces are proposed, not 14 as the Council suggests.

Notwithstanding this, the Council's consideration that the proposed car parking is inadequate is based entirely on unsubstantiated assumptions about people's travel behaviour. No technical assessment is provided to support these assumptions.

The proposed car parking provision is entirely in accordance with PPG13 which encourages reduced provision in locations such as the appeal site. There is local support, particularly from local businesses and Shoreham Airport, for a town centre hotel and a reduced level of parking provision is considered appropriate in view of the

site's proximity to the mainline train station and bus stops. To provide more car parking would most likely encourage more guests to arrive by car. The Council state that Shoreham town centre is congested and it therefore follows that ways to discourage people from bringing their cars into the area should be supported. The Highways Authority consider the proposed level of car parking to be acceptable, and the Council's Appeal Statement provides no evidence to support taking an alternative view.