

Development Management - Delegated Officer Report

Application Number: AWDM/0180/26

Recommendation – Approve

Site: Church Of St Mary De Haura, Church Street, Shoreham-by-sea

Proposal: Replacement of doors to the south transept, installation of a post externally within the grounds of the church to mount a button to automate the doors, installation of below ground drainage to facilitate installation of WC facilities

Date of site visit: 25 February 2026

Neighbours checked: Y

Additional neighbour notifications: N

Proposal, Site and Surroundings

The Church of St Mary de Haura is one of the most important Norman parish churches in Sussex and is protected as a Grade I listed building.

The application seeks planning permission for works to enhance the accessibility and usability of the space within the south transept. It is proposed to replace the existing doors to the south transept with new automated timber doors to match existing, to install a post externally within the grounds of the church to mount a button to automate the new doors, and to install below ground drainage from the south wall of the south transept through the churchyard to East Street to facilitate the installation of WC facilities.

The Church benefits from ecclesiastical exemption from Listed Building Consent. Consequently, matters affecting the fabric and historic character of the church are controlled instead through the Church of England's faculty jurisdiction, which provides an equivalent level of heritage scrutiny. Planning permission is therefore required for the proposed works insofar as they fall within the statutory planning regime.

Relevant Planning History

None relevant

Consultations

Heritage Consultant: The proposal seeks to provide WC and improved access to the church for people with disabilities. The doors proposed are to be a like for like replacement and as such will have little impact, if any upon character and appearance of the conservation area, or indeed the setting of the listed buildings in the vicinity. The post and automatic door operating button will be a modest addition that although identifiable and modern in its application, will not present an unacceptable degree of harm and is clearly providing a public benefit that outweighs any negligible harm caused.

In summary the proposed will not cause harm to the character and appearance of the conservation area or the setting of the listed building. The internal works proposed are not planning matters and will be subject to consideration by the faculty of the Church of England.

Archaeologist: The West Sussex Historic Environment Record (HER) shows that the proposed development is located in an area with the potential for significant archaeological remains to survive. St Mary's Church is located within the historic medieval core of Shoreham, as it was prior its expansion in the nineteenth and twentieth centuries (HER DWS8591). The Church itself is Grade I listed and dates from the twelfth century, with later thirteenth and fifteenth century additions (HER MWS855).

The groundworks associated with the proposals have the potential to impact on significant archaeological deposits, including building remains related to the church and its development since its construction, but also, most prominently, human remains relating to the site's use as a burial ground since at least the twelfth century.

Given this, I recommend a programme of archaeological monitoring and recording is undertaken on any groundworks associated with the proposals, including, but not limited to, the lifting and lowering of floor-levels, the installation of service trenches and any ground investigations. The submitted Written Scheme of Investigation suitably outlines the methodology and archiving commitments of a scheme of archaeological monitoring and recording.

To understand the significance of archaeological deposits impacted by the proposal, a programme of archaeological monitoring and recording is being recommended in line with paragraph 218 of the National Planning Policy Framework (2024) and Adur Local Plan Policy 17. A recognised team of professionals should undertake the archaeological work. The archaeological potential beneath the site needs to be further understood by a programme of archaeological monitoring and recording.

In view of the above, I recommend that the following condition is placed on any permission:

RECOMMENDATION: Archaeological Monitoring and Recording

In accordance with the submitted Written Scheme of Investigation, the applicant will submit a final archaeological report or (if appropriate) a Post Excavation Assessment report for approval by the Local Planning Authority. This shall be submitted within 6 months of the date of completion of the archaeological fieldwork unless otherwise agreed in advance by the Local Planning Authority.

ADCAG: Recommend approval

Surface Water Drainage Consultant: No objection

Environmental Health: No objection

Southern Water: No objection

Representations

None received

Relevant Planning Policies

Adur Local Plan 2017 Policies 1, 2, 15, 16, 17
National Planning Policy Framework (December 2024)

Planning Assessment

Principle

The proposal involves works to a Grade I listed building. 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 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 this case policies 16 and 17 of the Adur Local Plan).

Visual amenity and impact on heritage asset

The Council’s Heritage Consultant has no objection to the proposals. He has advised that the doors “*are to be a like for like replacement and as such will have little impact, if any, upon character and appearance of the conservation area, or indeed the setting of the listed buildings in the vicinity.*”

The post and automatic door operating button will be a modest addition that although identifiable and modern in its application, will not present an unacceptable degree of harm and is clearly providing a public benefit that outweighs any negligible harm caused.”

The proposed pipework will pass below ground through the churchyard and an archaeological written scheme of investigation has been submitted which outlines a methodology for recording any archaeological remains which may be impacted by the works. The Council’s archaeological consultant has recommended a condition to secure the submission of final archaeological report following the completion of archaeological fieldwork.

Recommendation

APPROVE

Subject to Conditions:-

1. Approved Plans
2. Standard 3 year time limit
3. In accordance with the submitted Written Scheme of Investigation, the applicant shall submit a final archaeological report or (if appropriate) a Post Excavation Assessment report for approval by the Local Planning Authority. This shall be submitted within 6 months of the date of completion of the archaeological fieldwork unless otherwise agreed in advance by the Local Planning Authority

Is recommendation contrary to letter(s) of representation? N

1. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

Case Officer: Peter Barnett

Date: 10 April 2026

Authorised by: Jo Morin

Date: 10.04.2026