

Conservation Officer Comments
Amended Plans or Further Details

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Application Number:	AWDM/1006/26
Location:	St Marys Church Hall, 25 East Street, Shoreham-by-Sea, West Sussex
Proposal:	Application to vary Conditions 1 (approved plans) and 5 (Cycle Storage) of approved AWDM/0082/26. Amendment: Formation of doorway below existing window on New Road (south west) elevation, and block up window to half landing on New Road (south east) elevation.
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

Site and Surroundings:	The application site comprises St Mary's Church Hall at 25 East Street, Shoreham-by-Sea, occupying a prominent corner plot at the junction of East Street and New Road within the historic core of the town. The building forms part of a closely developed townscape immediately east of the Grade I listed Church of St Mary de Haura and lies within the Shoreham-by-Sea Conservation Area. Its position at the meeting of East Street and New Road gives it a clear townscape presence, particularly in short-range views along East Street, from New Road, and from the adjoining public realm around the churchyard and war memorial. The site is occupied by a former church/community hall complex with component parts dating from the nineteenth and early twentieth centuries. The building has historic associations with the parish church and contributes to the character and appearance of the conservation area as a non-designated heritage asset. Its setting is defined by the medieval and post-medieval street pattern of central Shoreham, the open space and visual presence of St Mary de Haura to the west, and the contrast between the tighter residential grain of New Road and the more civic and commercial character of East Street. Planning permission AWDM/0082/26 approved the change of use and conversion of the building to provide a mixed-use scheme comprising a new church/community hall and parish office together with seven residential units. The present application seeks non-material amendments to that approved scheme, namely: • The formation of a new door below an existing window lintel to provide access to the bicycle and bin store from the New Road pavement, • the blocking of a landing window to the east elevation of the New Road stair enclosure, and • reductions in the size of windows serving Apartment B bedrooms on the second-floor rear elevation.
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	The amendments are limited in scope and relate principally to access arrangements and detailed compliance with Building Regulations guidance. A subsequent non-material amendment was submitted under AWDM-885-26 which proposed 2 aspects that caused heritage concern which included the formation of a cycle store door to the southern elevation and the infill of a window serving the current stair to the east facing elevation. This application seeks a variation of condition to vary the approved plans including the same scheme of works as previously proposed. Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a 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. 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 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. <u>Policy 16: A Strategic Approach to the Historic Environment</u> 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. The Council will: • Continue to produce Conservation Area Character Appraisals and Management
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	Plans for Adur's Conservation Areas. • Recognise the role of and encourage the best use of heritage assets in regeneration, design, tourism and education. • Use Article 4 directions where important heritage assets are under threat. • Work with others, including the local community where appropriate, to address how best to conserve any assets at risk of loss and to understand the significance of the historic environment in Adur's character and sense of place. <u>Policy 17: The Historic Environment</u> For All Heritage Assets: Where a proposed development would lead to substantial harm to, or total loss of a designated heritage asset, this will not be permitted unless there are compelling circumstances. Development should not adversely affect the setting of a Listed Building, Conservation Area, archaeological feature or Scheduled Ancient Monument. Listed Buildings: Planning permission and/or Listed Building consent will only be granted for internal or external alterations, changes of use or extensions to a Listed Building provided that the internal or external appearance or historic character of the building is not adversely affected. The reinstatement or replication of original features such as windows or doors will be supported. In the case of extensions and alterations, materials used must be consistent with those originally used or typical of the locality. Changes of use may be considered which might normally be resisted on other grounds (subject to local access and environmental considerations) in order to secure the retention of a building of historic or architectural interest. New development which would adversely affect the setting of a Listed Building, in terms of design or materials, will not be permitted. Conservation Areas: Development in Conservation Areas will be required to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of that area. Advertisements in Conservation Areas should respect the character, proportions and design of the building on which it is displayed, and use traditional materials where necessary. Where an application for planning permission or Conservation Area consent is submitted for the alteration, change of use, extension or repair of a building or feature in a Conservation Area, the retention of original features or, where this is not possible, their reinstatement with appropriate materials and the removal of unsympathetic features will be sought. Conservation Area Character Appraisals will be used to assess applications within designated Conservation Areas and opportunities will be taken through new development and other measures to preserve and enhance these areas, and to implement the recommendations of the Conservation Area Management Plans. The importance to the local area of key non-listed buildings within Conservation Areas will be a material consideration in assessing an application for their demolition or development. Where in compelling circumstances the Council is minded to grant consent for demolition of a building in a Conservation Area, this shall not be granted until detailed plans for redevelopment have been approved. Consent will be subject to a condition preventing demolition until a contract for the approved redevelopment scheme has been awarded. Archaeological Features: The Council will ensure where possible the preservation of archaeological features against damaging or discordant development. Such features should only be removed or altered in compelling circumstances where there is no practical alternative and where provision can be made for recording. Where a site includes, or potentially includes heritage assets of archaeological interest, an appropriate desk-based assessment will be required and a field evaluation where necessary.
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Drawing Errors:	
Comments:	It should be noted that the non material amendment application in respect of the proposed received some justification as detailed below: <i>In respect of the proposed alternative cycle and bin storage arrangement, and the associated introduction of a new door to the New Road elevation, concern is raised regarding the visual and heritage impact of this element of the amendment. Although the proposed access is plainly utilitarian in function, it would be presented on a prominent street-facing elevation of the building and would be experienced from the public realm along New Road. The resulting intervention appears disproportionate and does not reflect the established traditional character, proportions or architectural rhythm of this part of the building. It is therefore considered that this aspect of the proposal would cause harm to the character and appearance of the Shoreham-by-Sea Conservation Area and to the contribution made by the building as a non-designated heritage asset within that area.</i> <i>It is also noted that the originally approved plans appear to have provided adequate cycle/bin storage and associated access arrangements. On that basis, no clear or compelling justification has been advanced to demonstrate why this additional street-facing opening is necessary, nor has any public benefit been identified that would outweigh the less than substantial harm caused. Unless a more compelling justification can be provided, this element of the proposed non-material amendment should therefore be withdrawn.</i> <i>In respect of the proposed blocking of the New Road stair window, it is noted that this window sits within an elevation articulated by brickwork and stone string detailing. Beyond the general statement that the amendment is required “to comply with Building Regulations Approved Document Guidance”, no substantive justification has been provided to explain why the existing arrangement fails to comply, why the removal or blocking of the window is necessary, or whether any flexibility could be applied by the building control body in the interpretation of the relevant guidance. It is also unclear whether alternative internal alterations could secure compliance without requiring the loss of this external opening. Furthermore, the submitted drawings do not specify how the window would be infilled, detailed or finished following its removal. In the absence of this information, the submitted details are insufficient to allow a confident heritage-based appraisal of the impact of this element of the proposal on the character and appearance of the conservation area and the building’s contribution as a non-designated heritage asset.</i> Further justification was provided that stated:

•Blocking of a landing window to the East elevation of the New Road stair enclosure.

The blocking of the window is necessary to meet the requirements of Part B of the Building Regulations concerning the integrity of the stair as a protected escape. Retention of the window would entail the installation of 60-minute fire-resisting glazing either to the landing window or the front glazing of the adjacent house. The performance required could only be achieved within metal framing and it would be very difficult to attain an appearance sympathetic to the original building with such a glazing system. The blocking of the window with a carefully matched or reclaimed brick is, we think, most likely to be successful in terms of appearance.

The brickwork to the East elevation of the stair enclosure exhibits several periods of repair and rebuilding indicative of historic movement or partial collapse of the South-East corner. The landing window contributes little to the overall sense of the New Road elevation. The amendment proposal as submitted showed the new brickwork finished flush with the existing face, with the adjacent stucco bands retained as decorative quoin elements; given the fragmentary nature of the existing brickwork, it was felt that this would give the elevation the most unified appearance. An alternative approach could be to express the blocked window through the slight recessing of its brickwork infill, although the extensive cracking of the finishes internally suggest that a fully toothed-in solution would be of some structural benefit to the building.

Photo 1. The existing East elevation of the New Road stair enclosure



•The formation of a new door below an existing window lintel to provide access to the bicycle and bin store from the New Road pavement.



The staircase within the New Road stair enclosure retains its original sweeping mahogany handrail and decorative cast iron balusters, all of which are to be restored as part of the project to become an attractive and valuable feature of the approach to the apartments. Ideally, the restoration would include the removal of the rather clumsy later/temporary (cloakroom/ticket booth) partitioning at ground floor to expose the stair as it was originally designed.





Photos 2,3,4 & 5. Interior views of New Road Stair showing the cast iron balusters and the temporary/semi-permanent cloakroom/ticket booth added later

However, for the space below the landing to be accessed from within the stair enclosure, it would be necessary to construct a substantial mechanically ventilated fire-resisting lobby at ground floor alongside the first flight of the stair (in the location of the existing cloakroom/ticket booth) to achieve compliance with the requirements of the Building Regulations (again as a consequence of the stair's status as a protected escape). Such a lobby would preclude the full restoration of the stair to its original appearance.

'Whilst the restored stair will be visible from the public realm through the windows fronting New Road, we accept that it would only marginally enhance the general character of the Conservation Area. From a more general conservation standpoint, however, we felt that, whilst the proposed new doorway might represent a small change to the building's outward appearance, its allowing the full restoration and realisation of the amenity potential of the staircase (arguably a more significant heritage feature) outweighed this, especially as the new door opening, which extends an existing window aperture, sits quite comfortably within the deliberately asymmetric composition of the New Road stair's South elevation.

	<i>Additionally, the direct access to the store from the street that the door affords will enhance the day-to-day functioning of the building.'</i> The additional justification is noted; however, it does not resolve the heritage concerns previously raised. The argument in favour of the new external access door is principally that it would avoid the need for a substantial internal lobby within the New Road stair enclosure and would thereby allow the retained Edwardian stair, including its mahogany handrail and decorative cast iron balusters, to be restored and better appreciated. That is a relevant heritage benefit and carries some weight in the assessment. The proposed blocking of the lower first-floor/half-landing window remains of particular concern. The window forms part of the external expression of the New Road stair enclosure and contributes to the legibility of that element of the building. Its loss would reduce the articulation of the elevation, remove an existing opening and introduce a more blank and consolidated area of brickwork where the building currently has a clearer relationship between internal stair function and external architectural expression. The stairwell area would also suffer from a distinct loss of light diminishing the architectural interest of this element of a heritage asset. The grand open, newly restored staircase would find itself in a dark and unrefined area where architectural features that intended to promote the halls grandeur have been blocked up. The fact that the brickwork shows evidence of alteration, repair or movement does not, in itself, mean that the window makes no contribution to character. Indeed, the varied fabric and surviving openings form part of the building's evolved appearance within the conservation area. The applicant's position that the landing window contributes little to the New Road elevation is not accepted on the basis of the submitted information. The removal or infilling of an existing external opening should be treated as a harmful intervention unless it has been clearly demonstrated that there is no reasonable alternative. The submitted explanation identifies fire safety as the driver for the change, but it does not demonstrate that all possible options for retaining the window have been explored. In particular, further consideration should be given to whether the external window could be retained and supplemented internally by secondary fire-resisting glazing, or by another discreet internal measure, if technically feasible. Such an approach may allow the fire performance required by Building Regulations to be achieved while preserving the external appearance, rhythm and legibility of the stair enclosure. In relation to the proposed cycle/refuse store door, the principle of forming a modest external door to the New Road elevation is accepted, insofar as it would provide direct access to the store and appears to reduce the need for more intrusive internal subdivision within the New Road stair enclosure. However, the submitted door
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	design is not considered acceptable. The proposed combination of glazing and louvred lower panels has an awkward and overly utilitarian appearance which would not respond positively to the character of the building or the Shoreham-by-Sea Conservation Area. A more traditionally detailed painted timber door, such as a simple four-panel Victorian-style door or an appropriately detailed ledged-and-braced timber door, would be more sympathetic. The size, proportions and detailed relationship of the proposed door and the existing opening, lintel and surrounding masonry should also be reconsidered to ensure that the intervention appears well-proportioned and subordinate within the elevation. This may include widening the door so it is of a suitable size in both function and design terms. Overall, the proposal continues to give rise to less than substantial harm to the character and appearance of the Shoreham-by-Sea Conservation Area and to the contribution made by the building as a heritage asset. The degree of harm may be limited, but it has not been adequately justified. The external door may be capable of being made acceptable through amended design, size and detailing; however, the loss of the lower first-floor/half-landing window requires a more robust justification and clear evidence that less harmful alternatives have been fully considered before complete infill is accepted.
Design Review:	
Amended Plans / Additional Information Required: <i>[List the amended plans/additional information you are requesting, if any]</i>	1. Amended details of the proposed New Road door, including revised design, materials, finish, opening size, proportions, reveal treatment and relationship to the existing lintel and surrounding masonry. The revised design should explore a more traditional painted timber door, such as a simple four-panel Victorian-style door or an appropriately detailed ledged-and-braced timber door, rather than the proposed glazed and louvred arrangement. 2. Further justification for the proposed blocking of the lower first-floor/half-landing window, including confirmation that all reasonable alternatives to the loss of the window have been investigated. This should include, where technically feasible, consideration of retaining the external window and providing internal secondary fire-resisting glazing or another discreet internal solution capable of meeting the relevant fire requirements. 3. A clarified fire strategy and heritage justification explaining why the existing stair window cannot be retained, why complete infill is necessary, and how the proposed works would preserve the character, appearance and legibility of the New Road stair enclosure.
Conditions Required: <i>[List the conditions you are requesting, if any]</i>	1. 2. 3.

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Date of Comment 15/9/26