

Conservation Officer Comments
Amended Plans or Further Details

**Architectural & Historic
Buildings Consultants**

Mob: 07909 544908
Email: info@dgc-consultants.com
Web: www.dgc-consultants.com

Application Number:	AWDM/0885/26
Location:	St Marys Church Hall, 25 East Street, Shoreham-by-Sea, West Sussex
Proposal:	Non Material Amendment to Approved AWDM/0082/26 for new door to be formed below existing window lintel giving access to bicycle and bin store from New Road sidewalk. Blocking of landing window to East elevation of New Road stair enclosure. Windows to 2nd Floor Rear elevation for Apartment B bedrooms reduced in size.
Case Officer:	Peter Barnett — Direct line: 01903 221310. Letter dated 30 July 2026.

	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:	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. 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.
Comments:	In respect of the proposed alterations to raise the cill height of the second-floor windows serving Apartment B, it is noted that these openings are located to the rear elevation of the property. Given their rear-facing position and limited visibility within the wider townscape, this element of the amendment will have no direct impact upon the character or appearance of the Shoreham-by-Sea Conservation Area, nor upon the setting or significance of nearby listed buildings. As such, this aspect of the proposal is accepted. 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. 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. 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. In conclusion, while the rear second-floor window amendments are accepted, the proposed New Road door and the blocking of the New Road stair window are not currently supported on the basis of the information submitted. These elements lack sufficient justification, design detail and heritage assessment to demonstrate that they would preserve the character and appearance of the Shoreham-by-Sea Conservation Area or the contribution made by the building as a non-designated heritage asset. Amendments should therefore be made to the non-material amendment application, either by withdrawing the harmful and insufficiently justified elements or by submitting revised details and a clear justification capable of demonstrating that any resulting heritage impact has been avoided, minimised or appropriately outweighed.
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Simon Richard
Conservation Consultant for and on behalf of Adur and Worthing District Council
Date of Comment 13/8/26