



planning@adur-worthing.gov.uk

09:06 (3
hours
ago)

Comments summary

Dear Sir/Madam,

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

Comments were submitted at 08/05/2026 9:06 AM from Mr David Batchelor.

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

[Click for further information](#)

Customer Details

Name: Mr David Batchelor

Email:

Address: 28 - 29 Church Street Shoreham-by-sea West Sussex

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Design
- Other

Comments: This objection is submitted in strong opposition 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 adopted development plan, the Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008) "The Strategy", and the National Planning Policy Framework (December 2024), "NPPF".

Statutory and Policy Framework

Section 72 Duty

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 fails this test.

Adur Local Plan (Adopted December 2017)

The Adur Local Plan, adopted 14 December 2017 reinforces the conservation area protections and require new development to be of a design that respects and enhances the character and appearance of the area.

Article 4 Direction

It is noted that the application site is within, or directly abutts, an area subject to an Article 4 Direction. Such directions exist precisely because the character of the area is of acknowledged importance and would be threatened by inappropriate development. The effect of the Direction is to remove permitted development rights, requiring that proposals which might otherwise proceed without consent are instead subject to full planning scrutiny and public consultation.

The failure to seek prior consent - and the apparent failure to engage with the Council or community before commencing works - directly defeats the purpose of the Article 4 regime. The applicant cannot now seek to regularise, retrospectively, works that would almost certainly not have been permitted had they been properly submitted in advance.

Substantive Objections on Design and Materials with reference to Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008)

1. Bulk, Massing and Architectural Character

The Strategy explicitly identifies that certain retail buildings on the High Street were, at the time of its adoption, characterised as "bulky and uninteresting with long blank walls and flat roofs which do not contribute positively to the area or enhance the setting". This is recorded as a negative characteristic - a problem to be remedied, not a precedent to be followed or extended.

The development, the subject of this application, compounds precisely this problem. 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.

2. Materials

The Strategy states that "the texture created by the use of local building materials gives the conservation area based on the historic core a special feel". This is a clear, adopted policy requirement: new development must use locally appropriate materials sympathetic to the historic grain of the area.

The materials employed in this development do not merely fail to contribute to that special character - they actively detract from it. The use of inappropriate materials compounds the harm caused by the poor design and further undermines the significance of the conservation area as a heritage asset.

This constitutes harm to the setting and character of a designated heritage asset that, in the absence of clear and convincing justification weighs heavily against the grant of retrospective consent.

Procedural Concern: Failure to Engage

It is of serious concern that this development was carried out without prior consent and without any engagement with the local planning authority or the local community. Simple, economical design and materials choices - entirely consistent with the principles set out in the Strategy - were available to the applicant. The decision not to pursue them, and not to seek pre-application guidance, is neither excusable nor inconsequential.

This is particularly notable given that the applicant, the Co-operative Group, is an organisation whose stated values place community at its core. Proceeding with unauthorised development in a designated conservation area, without consultation, is inconsistent with those values and with the reasonable expectations of the local community.

Conclusion

For the reasons set out above, this application should be refused. The development:

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 in conflict with NPPF (December 2024);
3. Is contrary to the Adur Local Plan (2017) policies on design and heritage;
4. Fails to comply with the adopted Shoreham-by-Sea Conservation Area Character Appraisal & Management Strategy (18 March 2008) on both massing/design and materials;
5. Defeats the purpose of the Article 4 Direction in force in or adjacent to this location; and
6. Was carried out without consent and without pre-application engagement - a matter that weighs against its retrospective approval.

Kind regards



S