

Recommendation Report for Listed Building Consent for Alterations, Extension or Demolition of a
Listed Building

REF NO: A/73/26/L

LOCATION: Ham Manor Golf Club
West Drive
Angmering
BN16 4JE

PROPOSAL: Listed building consent for the conversion of an existing first-floor sash window on the rear elevation into a new outward-opening timber escape door and a new external steel fire escape staircase to provide a secondary means of escape from the first floor and serve the proposed doorway.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	As above.
SITE CHARACTERISTICS	Ham Manor is a Grade II Listed Building from the 19th century and is currently in use as a community and recreational facility. The building has evolved through a number of phases of alteration and adaptation which contribute to its significance as a heritage asset. An extensive programme of restoration, enlargement and redecoration was undertaken in 1929, which represent a key phase in the building's development and make a positive contribution to its character and significance.
CHARACTER OF LOCALITY	The site is located within the grounds of Ham Manor Golf Club complex. It is surrounded by the golf course, areas of mature landscaping and vegetation and a car park.

RELEVANT SITE HISTORY

A/72/26/L	Listed building consent for the replacement of the main entrance steps with a new entrance arrangement incorporating integrated disabled ramp access with existing steps remaining in situ, fully intact and unaltered, but will be temporarily covered by the new structure.	ApproveConditionally 29-07-26
A/32/25/L	Listed building consent for proposed external works to replace sections of rotten shiplap cladding with identical boards to match the existing structure, minor repairs to corner posts that have experienced rot. Within porch area, rotted non-original plywood to be replaced with shiplap cladding identical to building, existing guttering and downpipes cleaned and re-hung. External walls repainted to current white and black colours. Internal	ApproveConditionally 07-05-25

works restoring original layout of the Gratwicke building - removal of the existing toilets, replaced with installation of two new toilets in current kitchen area, existing kitchen soil and water pipes repurposed for new toilet facilities, existing floor to be carpeted, remove and replace ceilings, upgrade electrical system to include new fuse board, replacement of all internal doors with traditional wooden panel doors, painted white.

A/138/21/L Listed building consent for repositioning of the Golf Clubs Approve
main Bar and repositioning of modern timber stud wall to 18-08-21
Snooker Room, exposure of fireplace and door opening
works and the sealing up of 2 doors (former bar door
opening & former door opening into the bar seating
area).

Relevant planning history noted.

REPRESENTATIONS

Angmering Parish Council - No comment.

1 letter of objection received from nearby occupier, summarized:

- The proposal would harm the character of the Grade II listed building by removing an original sash window, adding a new doorway and external steel staircase.
- Disrupt the symmetry and appearance of a prominent historic elevation.
- The fire escape is proposed on one of the building's most attractive and architecturally significant facades, causing unnecessary visual harm.
- The application does not adequately justify why a fire escape is now required, why this location has been chosen, why less harmful alternatives have not been considered.
- Alternative locations on less prominent elevations (north or west) do not appear to have been properly assessed.
- The Heritage Statement appears outdated and does not provide a robust assessment of the impact on the listed building.
- Insufficient information has been submitted, including a lack of plans and elevations.
- The proposal fails to adequately justify the heritage harm and appears contrary to Arun Local Plan policies HER SP1 and HER DM1.

COMMENTS ON REPRESENTATIONS RECEIVED:

Comments noted and addressed in the conclusions section.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

CONSERVATION OFFICER

The proposal seeks the replacement of an existing sash window with a door, together with the installation

of an external fire escape staircase. The staircase would provide a secondary means of escape from the first floor and would serve the proposed doorway.

In assessing the proposal, consideration has only been given to its impact on the significance of the Grade II listed building. Issues to do with Health and Safety are outside of my remit.

Ham Manor is an attractive building which illustrates the development of a country house into a community and recreational facility. The evolution of the building and the various phases of its development contribute to its significance. It is disappointing that no appropriate Heritage Statement has been submitted which adequately assesses the impact of the proposals upon the buildings significance. I note that one used for a previous proposal on the ground floor has been provided. This assess the impact of a different scheme of works.

Likewise, it is disappointing that no existing or proposed elevations, and no floor plans, have been provided as part of the application. Such information is necessary to enable a full assessment of the proposals both by the applicant, their heritage consultant and the Local Planning Authority.

Notwithstanding this lack of information, it is clear that the eastern elevation is of significance. Historic mapping and the list description indicate that this part of the building forms part of the earlier historic development of Ham Manor. The elevation has a formal appearance with an attractive arrangement of sash windows which contribute positively to its architectural interest. As a result, this part of the building is particularly sensitive to change.

The proposal would affect both a first-floor sash window and the tripartite window below at ground-floor level. Not only would the proposal introduce a doorway into an elevation where no such opening currently exists at this level, but it would also require the removal of historic fabric. The introduction of a door in this location would appear out of character and would erode the architectural integrity of what is clearly an important elevation.

Based on the limited information submitted, the proposed staircase also appears substantial in scale. However, no scaled drawings have been provided to accurately demonstrate its dimensions or relationship with the building. The image submitted appears illustrative only and does not provide sufficient information for a proper assessment.

From the information available, the staircase would introduce a large and visually intrusive structure onto an important elevation. It would obscure views of the windows and disrupt the established rhythm and appearance of the fenestration. As a result, it would detract from the architectural character of the elevation and draw undue attention to a feature that has no historic precedent. I am unaware of any assessment of alternative locations being provided, or in fact having been undertaken.

Overall, the proposal would result in the loss of historic fabric, the creation of a new doorway in a location where one has not historically existed, and the introduction of a prominent external staircase. These works would cause harm to the character and appearance of the listed building and I am therefore unable to support the proposal.

Conclusion

The level of information provided as art of this application is insufficient and needs improvement. However, it is clear that it would be harmful and is not capable of support from a built heritage perspective.

The proposal is such that the impact can be described as causing less than substantial harm in accordance with paragraph 215 of the NPPF (2024). As such, you will also need to consider the public

benefits that the development may achieve as part of your assessment of the application, along with the contents of section 16/66/72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

COMMENTS ON CONSULTATION RESPONSES:

Comments noted. Since the Conservation Officer's consultation response was received, the applicant has submitted scaled drawings to assist in the assessment of the proposal. Whilst it is acknowledged that the scale bar shown on the drawings is not accurate, the plans provide clear dimensions and measurements upon which we can reasonably rely. Furthermore, the Conservation Officer has reviewed the submitted drawings and has confirmed that the additional information does not alter their assessment or the identified level of heritage harm arising from the proposal.

POLICY CONTEXT

Outside Built-up Area Boundary.
Grade II Listed Building.
Area of Special Control (Adverts).
Archaeological Notification Area.
Within an area with potentially high ground water.
Arun Valley Impact Risk Zone.

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

HERDM1	HER DM1 Listed Buildings
HERSP1	HER SP1 The Historic Environment

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:
"In considering whether to grant Listed Building Consent for any works, the Local Planning Authority shall 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."

The proposal is not considered to comply with this criteria in that would materially affect the character and the setting of the Grade II Listed Building.

OTHER MATERIAL CONSIDERATIONS

There are no other material considerations to be weighed in the balance with the Development Plan.

CONCLUSIONS

This application seeks Listed Building Consent for the replacement of an existing first-floor sash window on the eastern elevation into a new outward-opening timber escape door and the installation of an external fire escape staircase to provide a secondary means of escape from the first floor.

The principal policy considerations are Arun Local Plan (ALP) policies HER DM1 and HER SP1, together with the National Planning Policy Framework (NPPF), which relate to development affecting listed buildings. These policies require that development must protect, preserve and, where possible, enhance the historic character, integrity and setting of designated heritage assets.

Paragraph 207 of the NPPF (2024) requires applicants to describe the significance of heritage assets affected by development. In this instance, whilst a Heritage Statement has been submitted in support of the application, it relates to a different scheme and does not fully assess the impact of the current proposal on the significance of the listed building. Given the scale and nature of the proposal, this information would be required to fully assess the impact of the development. The applicant is advised to ensure that future submissions are supported by heritage assessments that accurately reflect the proposed works and their potential impact on the significance of the asset.

Paragraph 208 of the NPPF (2024) requires the Local Planning Authority (LPA) to identify the significance of the heritage asset affected by a proposed development. Ham Manor is a Grade II listed building constructed in the early 19th century by William Kinleside Gratwicke. The building derives its significance from its architectural and historic interest, including its original 19th century fabric and the substantial programme of restoration, enlargement and redecoration undertaken in 1929, which contributed significantly to its present appearance and character.

Paragraph 212 of the NPPF (2024) states that great weight should be given to the conservation of designated heritage assets when considering the impact of development proposals, irrespective of whether any harm would be categorised as substantial or less than substantial.

The Conservation Officer has been consulted and concluded that the proposal would result in less than substantial harm to the significance of the listed building. The proposal would involve the loss of an existing sash window and its replacement with a doorway within the eastern elevation. This elevation is characterised by a coherent arrangement of sash windows and contains no comparable door openings. The introduction of a doorway in this location would be incongruous and would erode the architectural integrity and symmetry of this important elevation.

In addition, the proposed external staircase, measuring approximately 5.4 metres in height, would introduce a substantial and visually prominent modern structure onto the elevation. The staircase would partially obscure existing features, disrupt the established fenestration pattern and detract from the architectural character and appearance of the listed building. The works would result in the loss of historic fabric and would fail to preserve the special architectural and historic interest of the designated heritage asset.

Paragraph 215 of the NPPF (2024) states that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Whilst the proposal would provide an additional means of escape from the building, insufficient evidence has been submitted to demonstrate why the fire escape is necessary, whether alternative solutions have

been explored, or whether less harmful options have been considered. In particular, no robust justification has been provided to demonstrate why alternative locations or internal alterations could not accommodate the required fire safety measures with less impact on the significance of the listed building. As such, limited weight in terms of public benefit can be attached to the secondary means of escape and therefore, the public benefits identified would not outweigh the less than substantial harm identified in this instance.

The proposed conversion of a historic sash window to a doorway and installation of an external steel fire escape staircase would result in less than substantial harm to the significance of the Grade II listed building through the loss of historic fabric and adverse impact on the architectural character and appearance of an important elevation. Insufficient justification has been provided to demonstrate the necessity of the works, the consideration of less harmful alternatives, or public benefits sufficient to outweigh the identified harm. The proposal is therefore contrary to Arun Local Plan policies HER DM1 and HER SP1 and the NPPF.

SUMMARY

The proposed development would result in less than substantial harm to the significance of the listed building. The application fails to demonstrate public benefits sufficient to outweigh that harm. The proposal would therefore fail to preserve the special architectural and historic interest of the Grade II listed building and is contrary to Arun Local Plan policies HER DM1 and HER SP1, and the NPPF.

HUMAN RIGHTS ACT

The Council in making a decision, should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (Right to respect private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for refusal of permission in this case interferes with applicant's right to respect for their private and family life and their home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of neighbours). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for refusal is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

RECOMMENDATION

REFUSE

- 1 The proposed conversion of a historic sash window to a doorway and installation of an external steel fire escape staircase would result in less than substantial harm to the significance of the Grade II listed building through the loss of historic fabric and adverse impact on the architectural character and appearance of an important elevation. Insufficient

justification has been provided to demonstrate the necessity of the work or the consideration of less harmful alternatives. No public benefits have been identified to outweigh the less than substantial harm identified. The proposal would therefore fail to preserve the special architectural and historic interest of the Grade II Listed Building and is contrary to Arun Local Plan policies HER DM1 and HER SP1, and the NPPF.

The development shown on the following plans is hereby refused:

- Location Plan
- Existing and Proposed Elevations, Door Specifications