

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

REF NO: BR/185/25/L

LOCATION: The Royal Norfolk Hotel
The Esplanade
Bognor Regis
PO21 2LH

PROPOSAL: Listed building consent for the installation of 101 solar panels across roof.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	This application seeks listed building consent for the installation of 101 solar panels on the roof of the building.
SITE CHARACTERISTICS	The site is a Grade II listed building, likely constructed in the 1840s, with subsequent extensions. The building presents an imposing and elongated stuccoed facade, set diagonally at the junction with West Street. It comprises three storeys and has been extended from its original seven bays to a total of seventeen.
CHARACTER OF LOCALITY	The building is located in the western part of The Steyne, Bognor Regis Conservation Area, which is of historic interest due to its links to the development of Bognor Regis.

REPRESENTATIONS

Bognor Regis Town Council - Objection.

- The solar panels would harm the significance of the listed building in conflict with the NPPF.
- The panels would not preserve or enhance the appearance of the conservation area in conflict with the Arun Local Plan and Bognor Regis Neighbourhood Development Plan.
- If the panels were removed from the front roof slope, Town Council would have no objection.

Conservation Area Advisory Panel - Objection

- The hotel occupies a prominent position on the Esplanade, and makes a distinctly positive contribution to the conservation area.
- Solar panels on the front (seaside) elevation of the roof would appear incongruous and detract from the character and appearance of the building and the conservation area.
- The flat roofed areas between the roof structures, or the inward facing roof slopes would be better locations for the panels.

1 No objection was received raising concerns that:

- The solar panels would be out of keeping with conservation area and would harm the appearance of the historic hotel.
- The installation of the panels would cause disturbance.
- The hotel already emits a loud humming noise.
- The applicants should first make improvements to the area to the rear of the hotel.

1 No letter of support was received stating that the installation of solar panels would help with rising energy costs, and that the solar panels would have little visual impact due to the parapet wall.

COMMENTS ON REPRESENTATIONS RECEIVED:

Comments noted. The impact of the solar panels on the character and appearance of the listed building is addressed below. Impacts of the solar panels on neighbouring residential amenity are considered in the planning application which accompanies this application for listed building consent.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

Conservation Officer

- The hotel occupies a prominent corner position at the junction of Aldwick Road and West Street, set back within its own extensive grounds. This arrangement allows the full principal elevation to be experienced and appreciated, contributing significantly to the building's visual prominence.
- The Royal Norfolk Hotel is not only the largest building within the conservation area, but its open, lawned frontage further enhances its architectural presence and reinforces its status as a landmark structure. The building's scale, detailing, and relationship to the seafront are integral to the historic townscape and the significance of the designated heritage asset.
- The proposed number of solar panels is substantial, with a significant proportion located along the front roof slope, which forms part of the principal elevation of the listed building. This elevation is clearly of architectural and historic significance, and any alterations here have the potential to affect its character. The submitted drawings confirm that the solar panels, or at least part of them, would be visible above the parapet.
- The introduction of solar panels in this location would result in a visually intrusive feature on a highly prominent elevation. This would appear incongruous against the established roofscape and architectural character of the building, thereby detracting from its contribution to the conservation area.
- Such an intervention would fail to preserve or enhance the character and appearance of the conservation area, contrary to the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant policies within the National Planning Policy Framework (NPPF), which require that great weight be given to the conservation of designated heritage assets.
- Alternative locations for the panels, such as the flat-roofed areas between the roof structures or inward-facing slopes that are not readily visible, would significantly reduce visual impact. This would provide a more appropriate solution that meets sustainability objectives without harming the heritage significance of the building or the conservation area.

Conservation Officer Additional Comments

- The amendments to the front elevation to represent an improvement over the original scheme. The removal of visible solar panels from the front elevation will reduce their impact on the character and appearance of the building when viewed from the public realm.
- The proposals no longer result in 'less than substantial harm' as previously identified. Instead, the level of harm is now considered to be neutral, with no adverse effect on the assets when considered as a whole. There is no objection to the revised scheme from a heritage perspective.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted.

POLICY CONTEXT

Designation applicable to site:
Grade II Listed Building
The Steyne, Bognor Regis Conservation Area

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."
Where the building is located in a Conservation Area, Section 72(1) of the Act states:
In the exercise, with respect to any buildings or other land in a Conservation Area of any powers (under the Planning Acts), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
The proposal is considered to comply with these criteria in that it is not considered to materially affect the character or the setting of the Grade II Listed Building or the character of the Conservation Area.

OTHER MATERIAL CONSIDERATIONS

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

CONCLUSIONS

This application concerns the installation of 101 solar panels on the roof of the Royal Norfolk Hotel. The key policies are Arun Local Plan (ALP) policy HER DM1 which relates to listed buildings, stating that proposals must protect, preserve and if possible, enhance the historic character and integrity of the building and its setting, and the heritage policies within the NPPF.

The NPPF (2024) sets out several steps when considering impacts on heritage assets. Paragraph 208 requires the Local Planning Authority to identify the significance of the heritage asset affected by a proposed development. The Royal Norfolk Hotel is a Grade II listed building dating from the mid-19th

century, with later extensions. Its position, scale and detailing contribute to the significance of the building as a heritage asset.

Paragraph 212 of the NPPF states that 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. The Local Planning Authority must then consider the level of harm associated with the proposal and decide whether there is any harm and if so, whether this is 'less than substantial harm' or 'substantial harm'.

Following the conservation officer's initial comments, the layout of the proposed panels has been amended, to reduce the number of panels on the principal elevation, and the remaining panels have been orientated so that they are set down further from the ridge and would be more concealed by the parapet roof. Following this alteration, the solar panels would not be seen when standing directly in front of the hotel, or when standing on the opposite side of Aldwick Road, or the promenade. Some views of the panels to the rear of the property would be gained from West Street and Norfolk Square, and from Norfolk Place which is directly to the rear of the site. The panels would therefore not likely be visible on the building's most significant elevation, or from key views of the building from the sea front.

Additional comments from the conservation officer indicate that the amended proposals result in no harm to the Grade II listed building as a heritage asset. The proposals are in accordance with NPPF and HER DM1, and listed building consent should be granted for the proposals.

SUMMARY

The proposal is in accordance with the relevant Development Plan policies and the NPPF and as such, it is recommended for approval subject to the following conditions and informatives.

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) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval 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

APPROVE CONDITIONALLY

- 1 The works for which Listed Building Consent is hereby granted must be begun not later than the expiration of 3 years beginning with the date of this consent.

Reason: To comply with Section 18 of the Planning (Listed Building and Conservation Areas) Act 1990.

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

- Location Plan 2025830.01 REV A1
- Existing and Proposed Site Plan 2025830.02 REV A1
- Proposed Elevations 2025830.06 REV A2
- Proposed Roof Plan 2025830.05 A2

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Arun Local Plan policy HER DM1.

- 3 At all times during the progress of the work hereby approved adequate measures shall be taken to protect the remaining part of the Listed Building from collapse and/or structural damage.

Reason: To preserve the character and appearance of the Listed Building in accordance with Arun Local Plan policy HER DM1 and the NPPF.

- 4 Upon completion of the work for which Listed Building Consent is hereby granted any damage caused to the fabric of the building shall be made good to the satisfaction of the Local Planning Authority.

Reason: To preserve the special character and appearance of the building for the future in accordance with Arun Local Plan policy HER DM1 and the NPPF.

- 5 The/reconstruction/making good/of the building to complete the execution of the works for which consent is hereby granted shall be carried out as far as may be practicable with original materials. Any variation from the original materials must be with the written approval of the Local Planning Authority.

Reason: To preserve the appearance and special character of the building for the future in accordance with Arun Local Plan policy HER DM1 and the NPPF.