

Simon Davis
Arun Civic Centre
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simon.davis@arun.gov.uk
by email

30 August 2018

Dear Simon Davis,

Planning application: BR/191/18/PL, 2 - 4 Waterloo Square Bognor Regis PO21 1SU

SAVE Britain's Heritage has been alerted of this application for demolition of 2-4 Waterloo Square. We object strongly to the proposed demolition of the historic buildings. The buildings are an important non-designated heritage asset in a conservation area next to a grade II listed building and should be retained and adapted for future uses.

Significance

The two historic buildings are locally listed and within the Steyn Conservation Area. Their design is ambitious and commensurate with their prominent position opposite the pleasure pier – which is a grade II listed structure – and overlooking the Esplanade and Waterloo Square. Elegant gables, balconies, bay windows and rich decorations embellish the façades. With their elaborate décor, the two buildings are the only remaining examples of grand Victorian seaside architecture on the east side of the square. They are clearly influenced by the pleasure pier opposite. Together, the pier and nos. 2-4 Waterloo Square form an ensemble which encapsulates the town's ambitions as a seaside resort. The total loss of the two historic buildings would substantially harm both the conservation area and the setting of the grade II listed pier.

The application for demolition is not made in conjunction for an application for a redevelopment. It is likely that the site will remain vacant for a considerable amount of time which would be detrimental for the quality of the Steyn Conservation Area, the setting of the pier and Bognor Regis as a whole.

70 Cowcross Street London EC1M 6EJ

www.savebritainsheritage.org
Registered Charity 269129

Planning policy

The current National Planning Policy Framework (NPPF) provides the principles to assess this application on the extent of harm which would be caused to the designated assets (the conservation area and the pleasure pier) and the non-designated heritage asset (nos. 2-4 Waterloo Square).

Following para 194, substantial harm to a grade II listed building, i.e. the pier's setting, "should be exceptional" and "require clear and convincing justification", which, in our view, has not been provided. Para 201 states that "loss of a building (...) which makes a positive contribution to the significance of a Conservation Area (...) should be treated as (...) substantial harm under paragraph 195. In our view, demolishing nos. 2-4 Waterloo Square does not "achieve substantial public benefits that outweigh that harm or loss" (para 195).

The 'balanced judgment' required of the local planning authority under para 197, should weigh the scale of any harm against the significance of the heritage asset. In this case, the judgment involves the total loss of the asset which are locally listed buildings, which clearly weighs strongly in favour of rejecting the application for demolition.

The NPPF also states that "where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision" (para 191). This is particularly relevant as the two properties are sadly in a poor condition, which suggests years of neglect by the leaseholder and freeholder.

The Arun Local Plan provides guidance on listed buildings (Policy HER DM1), locally listed buildings (Policy HER DM2) and conservation areas (Policy HER DM3). The plan sets out that "Proposals affecting statutory Listed Buildings will be required to (...) protect, and where possible enhance the setting of the building" (Policy HER DM1). In our view, the loss of nos. 2-4 Waterloo Square causes substantial harm to the setting of the pier.

The plan states that "Planning permission will only be granted for development which results in the loss of existing Buildings or Structures of Character when it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use. Replacement structures will need to be of a high quality design Policy (HER DM2)." In our view, it has not been justified why the existing buildings cannot be successfully reused.

On conservation areas, the Arun Local Plan states that "Within Conservation Areas, permission for development involving demolition or substantial demolition will only be granted, subject to conditions, if it can be demonstrated that:

- The structure to be demolished makes no material contribution to the special character or appearance of the area; or
- It can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use; or

- It can be demonstrated that the removal of the structure and its subsequent replacement would lead to the enhancement of the area; and
- Permission has been granted for the redevelopment of the site (Policy HER DM3)."

We consider that as locally listed buildings, nos. 2-4 make a positive contribution to the special character of the conservation area and that it has not been justified that demolition is the only possible option. We would expect to see a comprehensive assessment of the existing buildings in terms of repairs, adaptability and reuse. The buildings would lend themselves to a range of alternative new uses.

Furthermore, the supplementary planning guidance for conservation areas sets out the Council's aims as follows: "Retention of buildings, structures, planting and open space which contribute to the special character and appearance of each conservation area." We would urge you to follow your own and national policy guidance.

For the reasons set out above, we strongly object to the application for demolition.

I trust these comments are useful to you. Please contact me at this office should you need further comment or clarification.

Yours sincerely,



Thomas Bender
Conservation Adviser