

**ADC Planning Consultation
Response from the Historic Buildings Adviser**

Application Number	BR/262/13/L
Address	Manor House, 12 Chichester Road, Bognor Regis, PO21 5BP
Description	Application for Listed Building Consent for conversion of existing listed building currently vacant to provide 4no flats. Demolition of single storey building at rear and construction of single storey extension and separate 2 storey building to provide 5no flats (9 in total).
Case Officer	Peter Cleveland
Site Visit	Previous

Objection

Manor House is a mid-19th century Villa of strong character and typical of its period. It has a strong, symmetrical façade and with the original windows restored, would once again provide a pleasing amenity. Whilst the building has been extended to the rear in a largely inappropriate manner, it is only single storey, so its impact is reduced. This could of course be easily removed and the building and its setting reinstated.

Policy 126 of the NPPF puts forth the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Conservation Principles (English Heritage, 2008) defines conservation as 'the process of managing change to a significant place in its setting in ways that will best sustain its heritage values'. In this way, Conservation encompasses more than retention of fabric, and includes protection of the heritage values and setting of the place. Under these terms, development can only be considered sustainable as defined by the NPPF, **where the result is not substantially detrimental to the fabric, character, and setting of a heritage asset(s)**. Unfortunately, the proposals put forward here are unacceptable on a number of levels and result in excessive harm to the listed building and its setting.

The proposed addition to the side, whilst subservient in height, has an excessive footprint which is not sympathetic with the listed building or its plan. The large area of flat roof is also inappropriate.

Internally the proposed alterations appear wholly unsympathetic, particularly as the building has a strong cellular plan. Whilst there may be some alteration here, the total disregard for the plan and the nature of the subdivision is extremely problematic. Authorities are required to protect the quality of

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internal spaces as part of the building's special interest. Para 182 of EH guidance clearly states:

'The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases ... and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings...will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.'

The development of the extension to the rear into a two storey block of flats is also not acceptable. Whilst a single-storey addition may have been justified in providing a care facility, this broader public benefit is not relevant here. The new proposal instead represents overdevelopment within the setting of a listed building - one that directly competes with it in terms of both scale and massing. Para 132 of the NPPF advises authorities 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..... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.'

Whilst the individual issues here would independently raise strong enough concerns to recommend refusal, their accumulative harm and resistance to reversibility can only represent significant, long term harm to the listed building. As such they could serve to constitute a threat to its status and in doing so undermine the requirement to maintain heritage assets as a sustainable resource. One of the core principles of the NPPF is to preserve heritage assets as part of a more holistic approach towards sustainability. This includes design that conserves or enhances the historic environment and contributes positively to its protection. Whilst there is scope here to improve the building, this scheme does not pass the required tests and should be refused.

Ian Wightman
Historic Buildings Adviser

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