

Heritage Impact Assessment

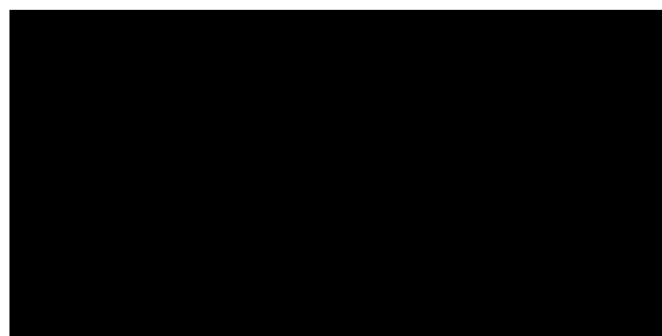
**Former Hotel Tennis Courts Adjacent to the Royal Norfolk Hotel,
West Street, Bognor Regis, Sussex, PO21 2LH**



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1.0 Introduction

- 1.1** This report comprises the historic impact assessment for the former hotel tennis courts adjacent to The Royal Norfolk Hotel, West Street, Bognor and its environs in relation to the proposed erection of a terrace of four dwellings. The report has been prepared by GHM Planning Ltd on behalf of Adrian Hoy.
- 1.2** In order to comply with the provisions of the National Planning Policy Framework 2012 (Paragraph 128) applicants are required to provide a description of the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 1.3** The proposed development must be considered in light of sections 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires that when considering a planning application for development that affects a listed building or its setting the decision maker 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. In terms of the Conservation Area the Act requires the development to preserve or enhance the character or appearance of the designation.
- 1.4** Paragraph 131 of the NPPF states that planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It further indicates (at paragraph 132) 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.
- 1.5** This statement will set out details of any relevant history and development of the site and adjacent heritage assets, will provide an assessment of the architectural and historical significance of the assets and assess the impact of the proposed development on the significance of the heritage assets.
- 1.6** The appraisal is based on an on-site assessment, the Historic Environment Records, Historic England listed building list and historic evidence.

2.0 Site Location & Description

- 2.1** The site is broadly rectangular and fronts onto West Street to the east with the Royal Norfolk Hotel to the west. To the north there is an access road which serves the converted stables, coach house and former public house to the rear of the hotel. To the south the site borders the open space associated with the hotel. The site is bordered by hedges to the east and south with a mix of brick wall and hedging to the north.
- 2.2** The site is currently an unused parcel of land with robust boundary treatment that prevents clear views onto the land. It occupies a prominent location close to the sea front but does not form part of the formal open space that serves the hotel.

3.0 Local Planning Policy

- 3.1** In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, application for planning permission should be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The Development Plan relevant to the assessment of this application is the Adopted Arun Local Plan 2011-2031 (July 2018), West Sussex County Council's Waste and Minerals Plans and Bognor Regis Neighbourhood Development Plan.
- 3.2** In accordance with the Local Plan Proposals Map, the site is located in the built-up area and within the designated Conservation Area.
- 3.3** The following heritage and design policies that are of relevance to the proposed development are outlined below:

Policy D DM1 Aspects of Form and Design – sets the form and design criteria against which development proposal should have regards to. Relevant to this application are:

1. Character - Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.
2. Appearance/attractiveness - Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.
3. Impact - Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.
4. Innovation - Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.
5. Adaptability - Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.
6. Crime prevention - Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.
7. Trees and woodland - All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.
8. Solar gain - Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.
9. Public realm - Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.
10. Layout – movement - Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open

spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

11. Layout – legibility - Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

13. Density - The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

14. Scale -The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

15. Aspects of form and design quality - Development should also comply with the Arun District Council Design Guide.

Policy D SP1 Design states that all development proposals must make efficient use of land and reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness and usability, health and wellbeing and climate change mitigation); and the influence these objectives have on the form of the development. All development proposals must reflect the efficient use of land, layout, landscape and its setting, density, mix, scale, massing, character, materials, finish, architectural details and nearby habitats of the site and local area.

Policy HER SP1 The Historic Environment states that designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance

Policy HER DM1 Listed Buildings states that Proposals affecting statutory Listed Buildings will be required to:

- a. Preserve or enhance the historic character, qualities and special interest of the buildings;
- b. Be necessary and not detrimental to the architectural and historical integrity and detailing of a Listed Building's exterior;
- c. Protect the architectural and historical integrity and detailing of a Listed Building's interior;
- d. Protect the special interest of buildings of architectural or historic interest; and
- e. Protect, and where possible enhance the setting of the building.

Policy HER DM3 Conservation Areas states that in order to preserve or enhance the character or appearance of the Conservation Area, planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a Conservation Area, provided that:

- a. New buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings;
- b. Alterations or additions to existing buildings are sensitively designed, constructed

of appropriate materials and are sympathetic in scale, form and detailing and retain or emphasise the features and qualities of the existing buildings, townscape or streetscape in the area;

c. Traditional features such as shop fronts, walls, railings, paved surfaces and street furniture are retained and restored;

d. Unsympathetic features are removed and missing features are restored or reinstated;

e. It retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges;

f. It does not harm important views into, out of or within the Conservation Area.

3.4 Paragraphs 184-202 of the NPPF refer to heritage assets.

3.5 The site lies within the designated Conservation Area for Steyne and Waterloo and the adjacent Royal Norfolk Hotel is a Grade II listed building. Section 12 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 132 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 more important the asset, the greater the weight should be. Paragraph 133 relates to substantial harm or loss of a designated heritage asset and paragraph 134 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit of the proposal, including securing its optimum viable use.

3.6 The Bognor Regis Neighbourhood Development Plan was adopted in August 2015. It identifies a number of key objectives which the following are considered relevant to this proposal:

OBJECTIVE 1 To restore and enhance our designated and non-designated heritage assets and their settings to the highest standard so that people of all means and abilities can enjoy Bognor Regis' identity as the first English purpose-built seaside resort all year round for many years to come.

OBJECTIVE 8 To plan, design and deliver attractive and lasting buildings and spaces that demonstrate a design approach relating strongly to Bognor Regis' identity as the first purpose-built resort and one of the sunniest towns in Britain.

3.7 Policy 2 of the NP is considered relevant in the determination of this application. This relates to 'Promoting the Seaside Identity' and states that development proposals within the 'Wider Town Centre Area' and concerned with extensions and alterations to the exterior of Designated and Non-designated Heritage Assets and their settings must adhere to a 'secure, restore and boost our seaside identity first' principle by echoing and responding eloquently and innovatively to the local built environment character and setting.

3.8 Policy 8a – Design Excellence – states that development proposals that fail to take the opportunities available for enhancing the local character and quality of the area and the way it functions will not be supported. A central part of achieving excellence in design is responding to and integrating with local surrounding landscape and context as well as the built environment through:

- Using good quality materials that complement the existing palette of materials used within the area;
- Using planting (typical of the south coast) commonly found on the south coast for

highway boundaries wherever possible and in keeping with the existing streetscape;

- Ensuring safe access for pedestrians, cyclists and motorists;
- Providing adequate refuse and recycling storage incorporated into the scheme to minimise visual impact and promote innovative design that is sustainable in its design, construction and operation;
- Promoting high quality spaces and light;
- Adopting the principles of sustainable urban drainage, where appropriate.

- 3.9** Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') requires the Local Planning Authority to pay special regard to the desirability of preserving listed buildings and their setting. In this context, the objective of preservation is to cause no harm, and is a matter of paramount concern in the planning process. Section 72(1) imposes a requirement in relation to the consideration and determination of planning applications which affect Conservation Areas, that special attention should be paid to the desirability that the character or appearance of the Conservation Area should be preserved or enhanced.

4.0 Heritage Assets

- 4.1** The site is a vacant parcel of land and contains no heritage assets. The site is however adjacent to a number of listed buildings. Those considered to be potentially affected are The Lodge and Norfolk Place to the north, Portland House to the east and the Royal Norfolk Hotel to the west. There are a large number of listed buildings within close proximity to the site; however, due to separation distances and intervening development, the setting of these buildings is not considered to be affected by the proposed development. As such, the assessment will focus on those buildings identified above.

- 4.2** As such, the buildings identified for further consideration and the listed building descriptions are:

Norfolk Place

1 and 2 West Street, 2 small early C19 houses, 2 storeys, 2 windows on each, stuccoed, cornice and parapet, one bay window on both floors of each house, glazing bars intact.

The Lodge

Circa 1840, 2 storeys, stuccoed, 2 windows with glazing bars, door with plain bracketed hood, deep eaves, hipped 2 span slate roof.

Portland House

Early C19, 2 storeys, 2 windows, stuccoed, cornice and parapet, curved windows on both floors, glazing bars intact.

Royal Norfolk Hotel

Probably 1840's, extended subsequently. An imposing elongated façade, set back diagonally to the corner with West Street. 3 storeys. Stuccoed. 17 windows (extended from 7 after 1898). Drafted ground floor and drafted pilasters between windows, which have sashes without glazing bars. 1st floor windows have pediments on brackets (the middle 3 segmental). A stringcourse connects the cills of 2nd floor windows. Free-standing royal arms with supports in centre, over low parapet. The cornice supported on elongated brackets, rhythmically spaced. Balcony to 7 centre bays, on iron columns and with delicate iron railings. Projecting porch, glazed, with columns. Irregular rear.

- 4.3 The site was originally part of the grounds of the Royal Norfolk Hotel. This building was constructed during the late 1830's/1840's and has been extended twice. The first was in 1880 when two bays were added to the western end to increase the façade from the original 7 bays to 9 bays. In 1971 a further three bays were added to the south-west and four bays to the north-east resulting in the 16-bay frontage that remains.
- 4.4 In 2007 the then derelict stable and coach houses to the north of the hotel were converted, extended and partly rebuilt to form 12 residential units accessed from the private road joining West Street.
- 4.5 The application site has never been developed although it formerly accommodated tennis courts. These have now been removed.
- 4.6 The access serving the application site is likely, historically, to have been formed a secondary approach to the hotel, potentially as a service and tradesman access. The access led to the stables yard to the rear and was separate to the main approach to the hotel. This changed towards the end of the nineteenth century/early twentieth century with the separation of the access to the stables and the main carriage drive; this is the current arrangement.
- 4.7 The site is within the Steyne & Waterloo Square Conservation Area. This was designated in July 1994 and there is no published conservation area appraisal. The eastern side of West Street, opposite the application site, contains a number of important buildings that individually, as a group, contribute to the designation.
- 4.8 A search on the HER's site did not identify any further assets to be considered. In conclusion, the assessment will therefore concentrate on the listed buildings highlighted in close proximity above and the Conservation Area. All other heritage assets have been assessed and it has been concluded these would not be affected by the proposed development.

5.0 Assessment

- 5.1 The proposal comprises the erection of a terrace of four dwellings with accommodation over two and three floors. The building would be orientated to front onto West Street, set back behind small yards with a brick dwarf wall with railings to denote the boundary with the highway. The central block of two dwellings would project slightly forward of the supporting wings and would comprise three storeys; this section would be the primary part of the structure with a hipped roof set back behind the parapet wall being almost invisible from the street. The supporting wings would be two storey with a parapet wall and would appear as a subservient element to each side.
- 5.2 The layout would include space to the northern and southern ends of the terrace with generous rear gardens to serve each dwelling. Small storage buildings would be located at the end of the gardens including covered parking, loading and storage areas. Beyond this there would be hardstanding to provide parking. This parking

area would be served by the access to the north, from the existing access road. The parking area would include some landscaping and a timber fence would separate the site from the hotel to the west. The existing hedge to the southern boundary would be trimmed but maintained at a height of 2 metres. The hedge along the eastern boundary would be removed.

- 5.3** The siting of the block has been proposed to reflect the sense of enclosure provided by the traditional development to the north of the site on both the eastern and western sides of West Street. As such, other than the access to the north, the proposed development is intended to be read as a continuation of the development to the north.
- 5.4** The design of the dwellings is intended to respond to the prevailing character and appearance of the terraces along West Street. These are a combination of two and three storeys with the latter used for focal points. The adjacent buildings are generally formal with symmetrical openings and a rhythm that is echoed through the proposal. The use of bay windows, vertical emphasis fenestration, cills, lintels and keystones under a parapet roof, continue the established theme of the traditional development. The use of a pitched roof to the rear portion of the building, also reflects the prevailing development although this would not be unduly visible from the street due to the setback.
- 5.5** The form of the building, a linear block, also responds to the prevailing development on the neighbouring sites and the hotel. The depth has been kept deliberately narrow to reflect the traditional depths and to ensure the façade is the most prominent elevation. The scale of the building has been carefully designed to ensure it would appear as a subservient building to the hotel which is the dominant structure in the locality. Adequate separation distances have been maintained to ensure the proposed building would not challenge the hotel or impede the setting.
- 5.6** The hedging along the southern boundary would be maintained to continue to screen the site. To the frontage a dwarf wall, picking up on the brick wall to the north, and railings, are intended to provide a more formal boundary treatment. The existing hedge is informal and does not respond to the prevailing character along West Street.
- 5.7** The siting of the proposal is set fronting onto West Street with the rear elevation approximately 35 metres to the side elevation of the hotel. The southern elevation of the dwellings would not project further south than the façade of the hotel and this combined with the narrow side elevation, would ensure the proposal would have a satisfactory separation distance and would not affect the spacious setting of the hotel.
- 5.8** The site is to the east of the Royal Norfolk Hotel. This is a prominent three storey building of a linear form with classical architecture through the use of a parapet, pediments, vertical fenestration and largely hidden pitched roofs. The building is set at an angle towards the junction of West Street and Aldwick Road with a curved access road arching in the foreground of the hotel. A large area of grassed open space, arched along the northern part and running parallel with the highway to the east and south, provides an open space to the front. This allows wide ranging views of the front of the hotel which adds to its prominence. The relationship with the sea, just to the south, is critical to its setting, explaining the location for the hotel and reflecting a period of investment and greater wealth for the town.
- 5.9** To the west of the access are areas of hardstanding used for car parking for the hotel. This leads to a service area to the rear. When viewed from the west along the highway the hotel emerges into view having been obscured by the more modern

three storey development. At this point, at the junction of Norfolk Square, the open and landscape foreground is already visible and is a prominent and important element within the street scene and setting of the hotel.

- 5.10** From the access point to the south of the hotel the open frontage remains a critical element. However, the spacious setting of the building is rather compromised by the six-storey building to the west although there is some open space and landscaping to intervene. Also, from this viewpoint properties along West Street are visible, providing a backdrop to the frontage open space. Hedges and trees border the application site from this viewpoint and do not allow views into the site.
- 5.11** Moving eastwards the three-storey property on the corner of West Street is a focal point and reflects the commencement of variation in building heights and styles along the eastern side of West Street. These buildings act as a backdrop to the open space to the front of the hotel. From the junction of West Street and The Esplanade the open space extends to the east of the hotel and includes the application site. The hedge prevents views into the site and has a backdrop of buildings in the distance.
- 5.12** From West Street the hotel is bordered by hedging with the façade of the hotel prominent and the open space to the front adding to the spacious setting. The side elevation of the hotel is visible with a backdrop of neighbouring building crowding the hotel to a degree. When viewed from the proposed access point the side elevation of the hotel and frontage open space is visible. The boundary to the existing access road is somewhat harsh with close boarded fencing prominent beyond the brick wall and entrance gates. To the rear of the hotel are further buildings in close proximity. When looking down West Street towards the sea the hotel is obscured by the existing buildings along the western side of the road with the open space to the front of the hotel again prominent.
- 5.13** The setting of the hotel therefore comprises clear views of the prominent building with a frontage orientated to the sea front and a large area of grassed open space to the front. The spacious surroundings allow the side elevation of the hotel to emerge into view. The hotel has spacious surroundings with the undeveloped foreground adding prominence to the façade. The hotel has a backdrop of terraced housing along West Street with further existing buildings receding into the distance. The hotel is also dominant on the skyline, adding to its spatial quality.
- 5.14** It is therefore accepted that the application site contributes to the setting of the hotel. In dismissing the previous application on the site in 2016 the Planning Inspector highlighted the importance of the space to the east, to the listed building's visual presence. It was also stated this openness east of the hotel was important from West Street where a strong sense of its spacious setting could be experienced even through the hedging. The Inspector considered the previous proposal would introduce a level of massing which could be a distraction to the asset and the skyline and harm the relationship between the original open space and the hotel's curtilage and the tighter urban grain beyond.
- 5.15** The current proposal has taken into account the two previous refused schemes, the comments from the Planning Inspector and the Council's Senior Historic Buildings Adviser. It is considered there were clear design and siting issues with the 2016 application which it is contended have been addressed in the current scheme. Of particular importance is the siting of the dwellings, close to West Street and the absence of development in close proximity to the hotel. This allows for the maintenance of open space to the east of the hotel and is therefore less challenging to the primacy of the hotel. The design details are also more successful in responding to the prevailing architecture, scale and massing without competing with the visual prominence of the hotel.

- 5.16** When viewed looking south along West Street the front of the proposed building would be visible as a continuation of the development along the western side of the highway. The building would frame views towards the sea front with open space and hedging closer to The Esplanade being maintained. It would not however be dominant and would allow a sense of openness to remain.
- 5.17** At the point along West Street of the existing access which would serve the development clear views across the open space are afforded to the side elevation of the hotel. It is acknowledged this adds to the general spacious setting of the hotel. However, the proposal has been carefully sited to allow clear views of the side elevation of the hotel and would also allow views of the open foreground. The prominence of the hotel roof, read above all other roofs at this viewpoint, would also remain unchallenged. The setting of the hotel at this point is compromised by the boundary treatment along the access and by buildings in the background acting as a backdrop. The proposed development would, to a small extent, impact on the spacious setting; however, when looking south-west from West Street the backdrop of the hotel is of prominent buildings with the spacious element only in relation to the land to the front of the hotel.
- 5.18** When viewing the site from the junction of West Street and The Esplanade the application site has a backdrop of buildings running along West Street and running north of the site. Although the site adds to the open space the sense of spaciousness is limited by the existing development which provides an unbroken developed backdrop to the site. The proposed development would not project beyond the hotel frontage and as such would be read in conjunction with the existing backdrop of development. A sense of spaciousness would remain due to the siting of the building close to the highway and the intervening open space. The prominence and open setting of the hotel would therefore not be compromised by the development to any significant degree.
- 5.19** When viewed from The Esplanade the hotel emerges into view with the setting framed by the open space to the front. To the west of the hotel this spaciousness is adversely affected by the proximity and massing of the adjacent development with no space read between the buildings at this vantage point. Swansea House and Alderwasley Cottage are also clearly visible to the east of the hotel and although in the background of the hotel they are read as a continuation of the hotel façade.
- 5.20** It is therefore contended that in assessing the setting of the hotel the land to the front is critical in providing open space and clear views of the façade. However, this spacious setting is not continued from many other vantage points as the surrounding development intervenes and is read in conjunction with the hotel with no intervening open space. The application site is to the side of the hotel and not the front and its importance to the setting of the hotel is less critical for the reasons outlined above. The siting would however still maintain clear views to the side of the hotel from West Street and the separation distances would ensure the spacious setting to the east would be maintained. The proposal would from some vantage points be read as the backdrop to the hotel, merging into the existing surrounding development. The lower level roofline of the proposal would be subservient to the hotel and maintain the hotel's dominance of the skyline.
- 5.21** The site is bordered by a hedge along the eastern elevation which does not respond to the more formal character of West Street and the timber fencing along the northern boundary provides a service yard appearance. Although undeveloped the site has mature hedging along the southern boundary which prevents views into the site. The

site is unused and unkempt and other than being open, actually detracts from the setting of the hotel in its current guise.

- 5.22** The key issue therefore is the extent to which the site contributes to the open, spacious setting of the hotel. To aid in this assessment an evaluation of the evidential, historic, aesthetic and communal values can be assessed.
- 5.23** Evidential value derives from the potential of a place to yield evidence about a past human activity from the physical remains or genetic lines that have been inherited from the past. The site has been closely related to the hotel and played a role in the historic operation of the hotel. However, the physical links have been weakened over the last twenty years with no related use taking place and the site separated visually by boundary treatment. The site therefore has limited evidential significance.
- 5.24** Historical evidence derives from the ways in which past people, events and aspects of life can be connected through a place to the present. The hotel has a high degree of historic association to the early development of the town as a coastal resort. However, the application site is considered to be of only moderate significance as it is incidental to this historic association and its development would not affect the historic evidence linking the hotel to the development of the town.
- 5.25** Aesthetic value derives from ways in which people draw sensory and intellectual stimulation from a place. The site itself has little aesthetic value but plays a role in the setting of the hotel. However, its significance is limited and its sympathetic development would not affect the aesthetic values of the hotel and the wider site.
- 5.26** Communal value is derived from the meanings of a place for the people who relate to it or for whom it figures in their collective experience or memory. Whilst the overall hotel site would provide a high significance of communal value to residents or historic guests the application site would carry little significance with the more formal open space to front carrying the most value in terms of the setting of the hotel.
- 5.27** Given the historic use of the site, last as tennis courts, the site has not provided formal open space in conjunction with the hotel, unlike the site at the front that has always been open and more formal. It is contended that the development of the application site frontage would provide development which would be read alongside the existing backdrop of development along West Street and to the north of the site. It would not comprise the spacious setting of the hotel to the east and would not affect the role the open space to the front plays in the setting of the hotel. The scale, massing and size of the proposal would clearly be subservient to the hotel which would retain its prominence. The development would not lead to the partial enclosure of the hotel as views of the side elevation, together with space to the front and rear would remain. In conclusion, it is considered the proposal would not be detrimental to the setting of the grade II listed hotel and the appreciation of the significance of the heritage asset would not be affected.
- 5.28** To the north of the site Norfolk Place and The Lodge are separated from the site by intervening buildings and two access roads. These buildings form a group acting as a backdrop to the application site and are not individually definable. These views are incidental rather than being planned. The settings comprise close proximity to other buildings and the proposed development would not be harmful to either setting.
- 5.29** Portland House to the east side of West Street can be viewed within the context of the application site. It forms part of the row of buildings that provide the enclosure and looks onto the site rather than the site playing a role in the setting of the building. As such, the proposal does not adversely affect the setting of this building.

- 5.30** The Conservation Area centres on the planned development of this part of the town to the east of West Street and to the west of Waterloo Square. It covers an important period in the development of the town as a seaside resort from the early 19th century with a series of planned spaces for formal town houses and large open and green spaces. As a result, the designation is a mix of dense built development in a linear form and largescale formal open spaces.
- 5.31** Within the area there are many fine buildings, usually in the form of terracing, with the architectural language including bay windows, sash windows with narrow glazing bars, railings, canopies and balconies, all expressed in a formal design and appearance.
- 5.32** The application site forms part of an open space to the side of the hotel and marks the commencement of the transition from the more densely developed town and planned formal open spaces, leading onto the sea front. As discussed above, the contribution this open space makes to the heritage assets is less than the open spaces that have been planned; the planned spaces include land to the front of the hotel. The application site is not part of this planned formal open space, as evidenced by the historic use of the space, which included tennis courts, relegating the site to a supporting role to the operation of the hotel rather than a formal, planned open space.
- 5.33** It is clear the proposal would encroach into this open space. However, what is debatable is the quality of the open space within the context of the Conservation Area. Although it was formerly the location of an earlier entrance to the hotel the importance has diminished over time and it could now be argued the site has a negative impact on the appearance of the Conservation Area, neither conforming to the formal open space nor the tightly grained streets or squares of the designation. Whilst enhanced management of the site, including maintaining the boundary treatment more effectively and regularly tidying the site, would enhance it, with no purpose for the site, this is unlikely to take place. As such, the option of not developing the site merely to maintain the openness it provides no guarantee or feasible option of enhancement.
- 5.34** It is therefore concluded the site represents a relatively small area of informal open space that does not contribute positively to the character or appearance of the Conservation Area and may indeed have a detrimental impact. Sympathetic development of the site could potentially lead to an enhancement of the Conservation Area.
- 5.35** The proposed development has been designed carefully to respond to the prevailing massing, scale and appearance of development within this part of the Conservation Area. The two and three storey natures of the proposal mirrors that along West Street and the architectural language picks up on the classical and formal architecture. However, whilst formal, the area is characterised by the variety of historic development within the general formal framework. This is reflected in the design which comprises a more prominent central element with supporting, ancillary wings. The proposal would occupy a position close to the highway boundary, to reflect the siting of neighbouring buildings and to mirror the sense of enclosure. The pitched roof would be set back significantly from the façade so that from the street level only glimpses of this would be possible. With a high quality design, materials and detailing including landscaping and boundary treatment, the proposal would enhance the character and appearance of the Conservation Area.
- 5.36** Overall, the proposal would not be harmful to the character or appearance of the Conservation Area. The key characteristics identified, including the formal layout, classical but varied architecture and formal open spaces, would all be maintained.

Furthermore, the unused site, which has an overgrown and unkempt appearance, would be given an acceptable new use and the benefit of this visually, together with the provision of additional housing, would lead to an overall gain in conservation terms. It should also be noted the role positive enhancements to historic areas can play in the overall regeneration of an area.

- 5.37** It is however acknowledged that the site is a current undeveloped space and previous developments have been considered harmful to the designated heritage assets. However, for the reasons set out above, this proposed development is considered not only to safeguard the setting of the hotel but would benefit the Conservation Area through the sympathetic re-development of an unused, vacant site. The proposal therefore complies with the intentions of the NPPF, the Act and the relevant planning policies set out above.

6.0 Conclusion

- 6.1** The proposal is considered to be acceptable in terms of visual amenity and would not be harmful to the identified heritage assets. The proposal therefore complies with the relevant national and local policies and the 1990 Act.