

Comment to planning proposal ref: PO/6/22/HH

9 June 2022

From Mr C Richards & Mrs J Prewett

We reside at Slate Cottage, the property immediately adjacent (north west) of the proposal site, St John's Cottage.

In November 2021 we made a comment to planning proposal ref: PO.12/21/L as follows:

'We wish to object in the strongest possible terms to the proposal on the basis that the proposal itself, which seeks to impose significant changes to a listed heritage asset, does not provide adequate justification as to how these changes then meet clear guidance on the protection of listed heritage assets contained in national and saved local planning policies.

We understand that Designated Heritage Assets enjoy substantial protection from development and references to this position are found in the following national and local saved policies:

- 1) Planning Act (Listed Buildings and Conservation areas) Act 1990.
- 2) National Planning Policy Framework (NPPF)
- 3) Adopted Arun local Plan 2011-2031 (July 2018)

Taken at face value and without due reference to the proposal being a Grade II listed Heritage asset, (and without reference to 1-3 above)

the proposal seeks to increase the built form of the current dwelling and its associated extensions and outbuildings by an amount that dwarf and dominate the original Listed Heritage Asset. The proposed garage building alone equates to a built form that is comparable in its overall mass to a small chalet bungalow and comparable to the footprint of the original Listed Cottage. It appears as an alien form in this setting when viewed against the Heritage Asset.

For these reasons it is difficult to see how the proposed mass of both the Garage building and the side/rear extension can be viewed as subservient to the existing Heritage Asset.

When the proposal is then viewed in context as to its setting and as a Grade II listed Heritage Asset it is difficult to reconcile how the listed Heritage Asset is to be 'protected' from harmful development given the scope of the proposal.

It is hoped that the following guidance will be applied to this proposal:

- 1) THE LISTED BUILDINGS and CONSERVATION AREAS ACT 1990 - States the following:

*"No person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest"*

- 2) (NPPF) CONSERVING and ENHANCING the HISTORIC ENVIRONMENT - Para 189-208 The proposal as submitted does not provide "*clear and convincing justification*" to support the radical changes the proposal would have on the Listed Heritage Asset, additionally it is difficult to

see how the proposal meets in spirit, the guidance contained in para 189-208.

3) ARUN LOCAL PLAN STRATEGIC OBJECTIVE for CONSERVATION and ARCHAEOLOGICAL HERITAGE is to:

*“protect and enhance Arun’s outstanding landscape, coastline, historic built and archaeological environment as well as the setting of the South Downs National Park, thereby reinforcing local character and identity.”*

Policy HER SP1 is very specific in its intention and spirit, in so far as it seeks to protect Designated Heritage assets and their settings, and states:

*“Designated heritage assets and their settings will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance”*

Then at 16.2.1 Listed buildings:

*“A listed building is one that has been identified by the Secretary of State as being of special architectural or historic interest, and as such is worthy of special protection”*

At 16.2.18 The policy goes on to say:

*“when assessing applications for development there will be a presumption in favour of the retention and enhancement of heritage assets. Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment”*

The proposal as presented does not reflect the sensitive nature of a Designated Heritage Asset or acknowledge the protection afforded to

its Grade II listing and its historic setting but seems to be at odds with National and saved local planning policies.

The existing Listed Heritage Asset, St Johns Cottage, does not need this scale of development to secure its future and, as such, the proposed enlargement with the introduction of discordant built forms is harmful.

We would ask the LPA to reject the proposal as a wholly unacceptable form of development for all the reasons given above.'

In his comment to planning applications PO/11/21/HH & PO/12/21/L, Martyn White, Principal Conservation Officer, Planning Services noted:

*Replacement extension*

*'I am of the opinion that the extension would be substantial, with it appearing to occupy a footprint similar to the main listed cottage. Such an extension would not be subservient and considered to be out of character and harmful. Further, the extension would also be visible from the front elevation of the cottage, and that proposed elevation does not sit comfortably with the listed building.'*

*Based on what I can see, the impact of the extension is increased when considered in the context of the substantial garage that is also proposed. At present, I believe that the size and potential appearance of the extension is harmful and could not be supported'*

With regard to the revised planning application PO/6/22/HH, the latest proposal does not consider all the points of concern relative to the development of Historic assets and their Historic settings, as

raised by the LPA Conservation Officer to the earlier withdrawn proposal.

St John's Cottage needs restoration and we would support any renovation work and development sympathetic and protective of its historical asset status and its special heritage setting. However, the new proposal still seeks to enlarge this historical site with an overbearing extension and garage. From the block plan, the extension alone seems to take up a footprint that would be similar to a detached dwelling in its own right and is little changed in mass and scale from that of the withdrawn proposal and therefore cannot be described as subservient to the Historical host dwelling.

The revised proposal, as per the previously withdrawn scheme, still fails to meet the Planning criteria that protects Historical buildings and their settings from inappropriate development and we therefore strongly object to this latest development proposal.