

Rustington Convalescent Home, Rustington

Introduction

1. This Heritage Statement Addendum has been prepared by Heritage Collective. It relates to changes to a previous permission (LPA Ref: R/83/15/PL) at Rustington Convalescent Home, Sea Lane, Rustington for the:

"Redevelopment of land to the rear of Convalescent Home to provide 26 new dwellings, reuse of laundry building to provide five apartments, reuse of both the cooks house & carpenters house to provide two dwellings with refurbishment works and first floor rear roof extension to the main house to create 4 additional patient bedrooms."

2. Due to the further deterioration of the listed buildings on site additional funding is required to make their repair and reuse viable. To this end it is proposed to provide an additional four units in the form of three new buildings within the grounds, changing the already permitted layout, and one new unit within the laundry building through first floor layout revisions.
3. This Addendum has been provided to build upon the previous reports prepared for the site by Morse Heritage. It assesses the effect of the revised layout and additional units on the heritage assets identified below, identifying any additional harm over and above the less than substantial harm that was previously assessed as resulting from the planning permission.
4. The application site encompasses Rustington Convalescent Home (listed grade II) and 'Ancillary Building at Rustington Convalescent Home' referred to throughout this report as the Laundry. It is not within a conservation area and therefore it is the effect of the proposed new housing by a change within the setting of the Rustington Convalescent Home, and the Laundry

and the internal works to provide an additional flat, that are considered within this report.

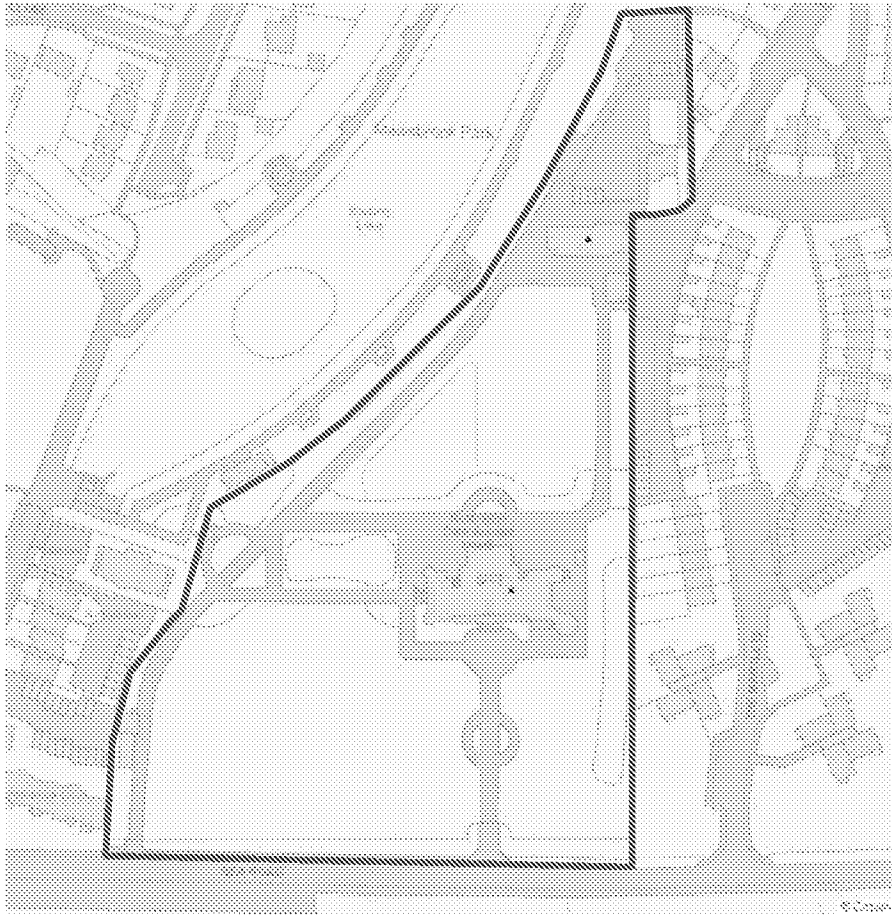


Figure 1: Application Site (Listed Buildings denoted by a blue triangle)

5. Taking into consideration both the Planning (Listed Buildings and Conservation Areas) Act, 1990 and the National Planning Policy Framework (2019) this report assesses the proposed internal alterations to the Laundry and the new development within the setting of the listed buildings against local and national policy. It has been informed by the drawn submission produced by Placebuilder Architects, the Heritage Statement and Heritage Statement Addendum prepared by Morse Heritage for the previous application and a site visit undertaken on 28 January 2019 in clear weather to aid the assessment of significance.¹

¹ Internal access was not possible to all of the buildings due to their current condition.

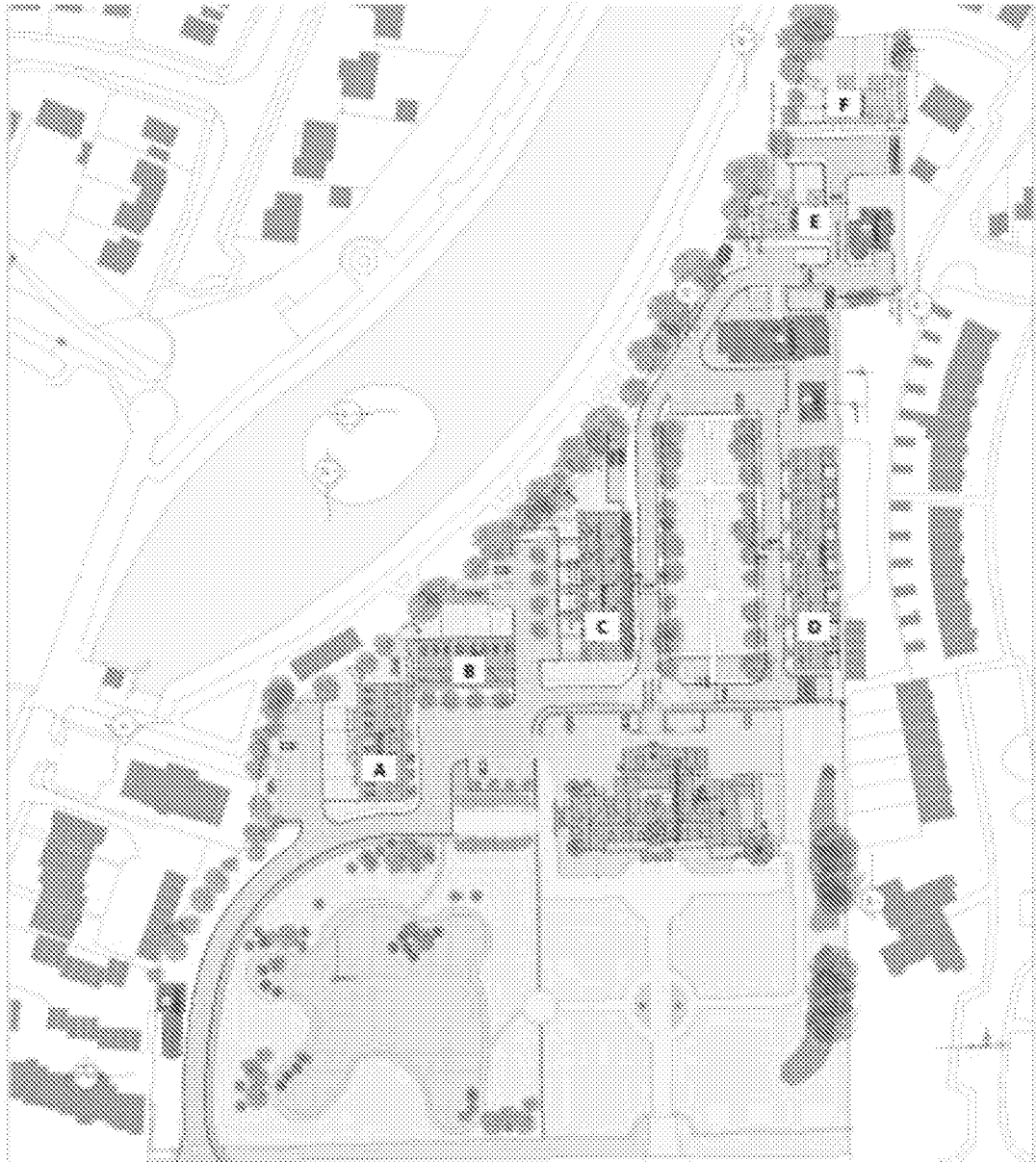


Figure 2: Permitted Development Masterplan (LPA Ref: R/83/15/PL)

Heritage Related Legislation, Policy and Guidance

6. Since the previous application there have been changes to both national and local policy and guidance. Current legislation, policy and guidance is outlined below to reflect these changes.

Legislation

7. The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990 ("1990 Act") to have special regard to the desirability of preserving a listed building or its setting. There is a strong presumption against the grant of permission for development that would harm the special interest of the listed building, although in some cases harm can be mitigated or outweighed by public benefits as set out in the National Planning Policy Framework (NPPF) 2018.

National Planning Policy Framework, 2019

8. Paragraph 189 of the NPPF requires applicants to describe the significance of any heritage assets affected by a proposal, to a proportionate level of detail.
9. Paragraph 193 and 194 of the NPPF introduces the concepts of "substantial harm" or "less than substantial harm" as follows:

"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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

10. Paragraph 195 of the NPPF describes how the balancing exercise in respect of harm and public benefit should be undertaken when dealing with cases involving substantial harm.

11. The term "serious harm" has been held, in the Courts, to equate to substantial harm, such as to vitiate or drain away the significance of a heritage asset. It is for the same broad reason that National Planning Practice Guidance (NPPG) also makes it clear that substantial harm is a high test. No substantial harm will result in this case.

12. Paragraph 196 of the NPPF refers to "less than substantial harm" as follows:

"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 benefits of the proposal including, where appropriate, securing its optimum viable use."

Local Policy

Arun Local Plan July 2018

13. Policy HER SP1: The Historic Environment states designated heritage assets should be conserved and enhanced in a manner appropriate to their significance. Development which will prejudice this will be refused.

14. This policy also notes the LPA will take a proactive approach to any heritage assets that may be at risk.

15. Policy HER DM1: Listed Buildings requires proposals affecting listed buildings to preserve or enhance the historic character, qualities and special

interest of the buildings. It should be necessary work that is not detrimental to the architectural and historic integrity of the building internally or externally and should protect the special interest of the building. It should as a minimum protect the setting of the building and where possible enhance this.

National Planning Practice Guidance

16. Other documents given consideration as part of this assessment include Historic England's 'The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3' (2nd Edition). This guidance notes the National Planning Policy Framework makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. The guidance notes:

'Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'

17. An assessment of the potential effect on significance by the Proposed Development should be undertaken by considering the following steps:
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;

- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
 - Step 5: make and document the decision and monitor outcomes.
18. This guidance has been considered when assessing the contribution of setting to the significance of the heritage assets potentially affected by the proposed new development at the application site.



Figure 3: Front (northern) Elevation of Rustington Convalescent Home (viewed from the south)



Figure 4: Front (northern) Elevation of Laundry Building

Significance of the Heritage Assets

19. The Heritage Statement and Addendum Statement² from the previous application outlined the significance of the Convalescent Home and Laundry. This is not repeated here but is outlined in summary below.

History of Rustington Convalescent Home

20. Originally built in 1897 by the Worshipful Company of Carpenters it served as a retreat for former working members. An OS map from 1989 demonstrates the original layout and surroundings of the building (Figure 5).

² Morse Heritage

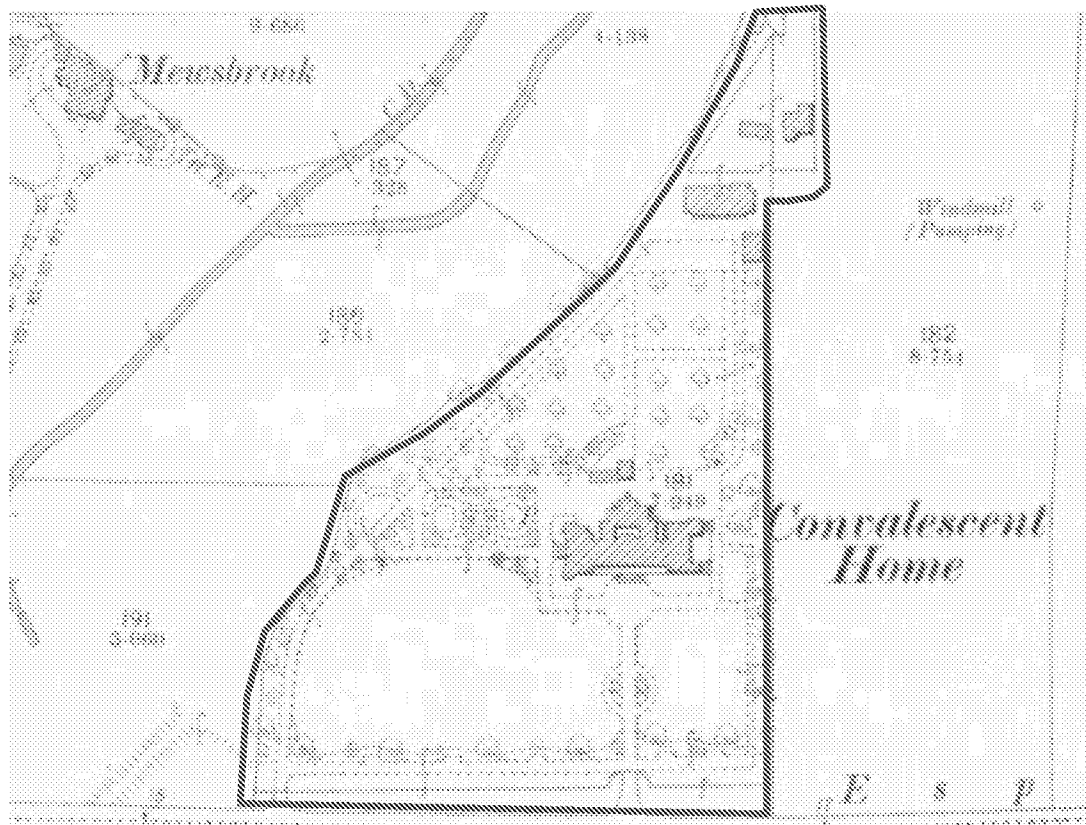


Figure 5: 1898 OS Map showing the original layout of the Rustington Convalescent Home and the layout of the formal gardens.

21. In 1898 the grounds of the Convalescent Home were laid out with a series of gardens, both formal and informal which related to the users and the buildings located within the grounds. The Convalescent Home had open lawns for exercise to the south of the building with paths shown along the boundaries and more formal planted gardens to the western approach, possibly used for visitors and staff. To the north were orchards and rose gardens.³

³ As shown in historic photographs within the Heritage Statement Addendum.

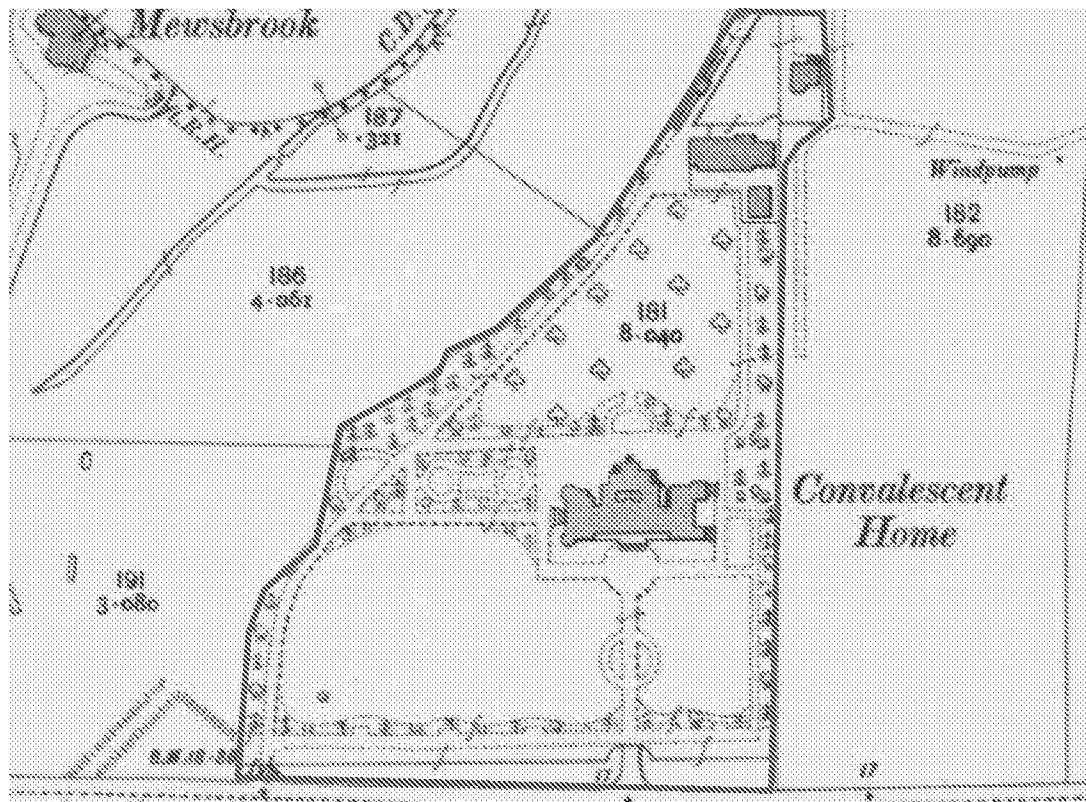


Figure 6: 1910 OS Map shows minor changes to the north of the Convalescent Home

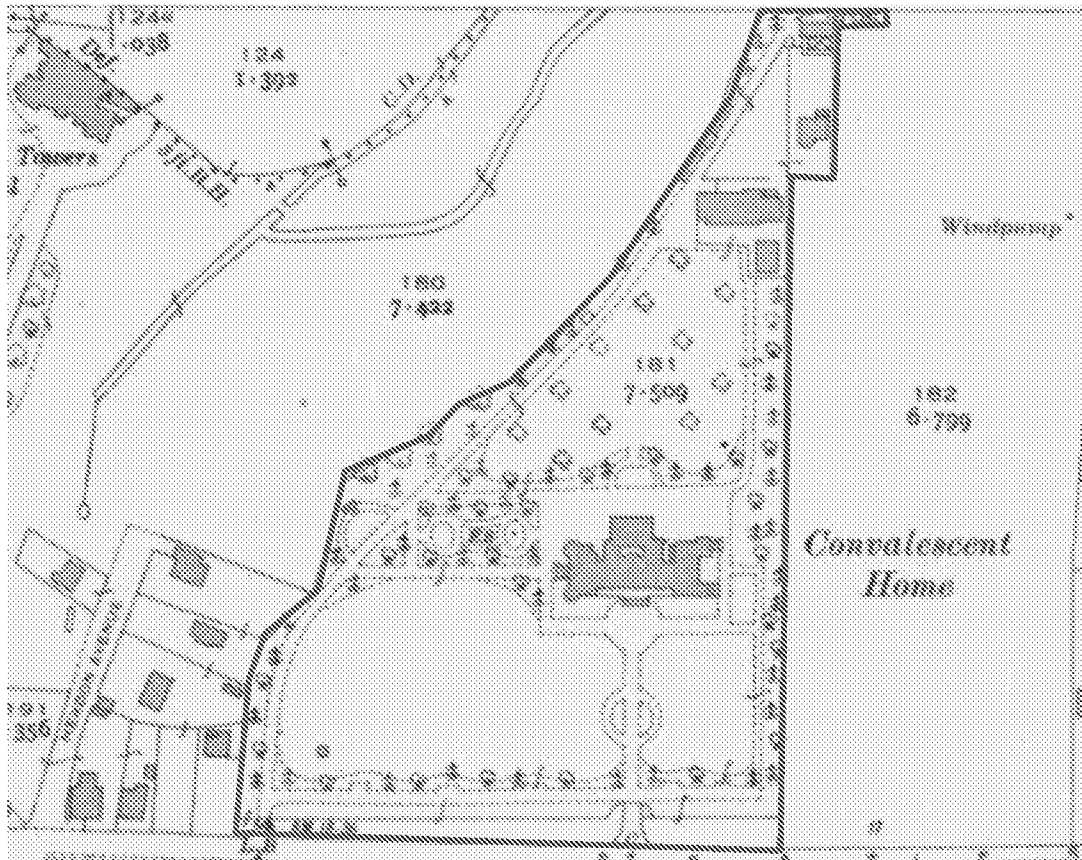


Figure 7: 1933 OS Map

Heritage Value of Rustington Convalescent Home

22. The list description for the Rustington Convalescent Home reads:

"Convalescent Home. 1897 by F Wheeler in a neo-Caroline style. Brown brick with red dressings and some stone enrichment. Slate hipped roof with single and paired segment headed dormers. 2 storeys with attics and 1 storey and attic wing to east. Central square 4-storey tower with stone dressings surmounted by clock stage and octagonal open cupola over. 13 bay central block, with sash windows in pairs, and half-hipped aprons below glazing bars only in broken upper leaves. Central stone segmental pedimented entrance in tower. 3-bay east wing, windows very closely spaced in centre with balcony over ground floor. 3-bay west wing projecting pediment gable over and with windows closely spaced in centre and 2-storey octagonal corner turret with octagonal conical roof over at

south-west corner. West front 3-bays with south-west corner turret. Central 1-bay projection with pediment over and stone segmental-pedimented entrance Interior: Contemporary wooden 5-flight rectangular open well staircase with ramped handrail, closed strings and spiral balusters. Decorative stained glass in octagonal bay lighting stair-well."

Architectural Interest

- Rustington Convalescent Home was built in a grand Neo-Caroline classical style by F Wheeler with an active roofscape of gables, turrets and cupolas which has a set piece institutional character;
- A key feature of the front elevation is its narrow central clock tower bay with over-sized stone segmental door surround at ground floor and topped with a bronze cupola;
- On the western elevation is a secondary entrance which has interest derived from its grand sweeping staircase and decorative entrance;
- The rear elevation has been altered and extended and is of less interest though it has similarities in terms of its detailing and materials to the front (principal) elevation;
- The eastern elevation is plainer and of less interest, a modern extension has been added to this side of the building, partly compromising its interest;
- The grounds of the Convalescent Home were an important feature of its significance (they have been heavily altered with the majority of planting and footpaths now lost); and
- Landscaped lawns to the front of the Convalescent Home continue to illustrate the original concept of a rural retreat with views to/ from the home across undeveloped space.

Historic Interest

- There is an important historic association with the Worshipful Company of Carpenters, a medieval trade guild who received their Royal Charter in 1477;
- Illustrative interest in its use as a care home/ retreat for former carpenters;
- The large grounds and location by the sea indicate the original intention of the home to be a retreat away from the City; and
- Surviving ancillary buildings and grounds show the former functions and requirements of the home when it was originally established including staff block, gardener's cottage and landscaped grounds.

Artistic and Archaeological Interest

- Rustington Convalescent Home is not of notable artistic or archaeological interest.



Figure 8: Northern Elevation of Main Building viewed from Laundry



Figure 9: Western Elevation

Laundry Building

23. The list description for the Ancillary Building at Rustington Convalescent Home reads:

"Staff quarters block for Rustington Convalescent Home. 1897 by F Wheeler in a neo-Caroline style. Brown brick with red dressings. Wooden eaves cornice. Parallel ridge slate roof with central gable pediment to south, containing thermal window, over slight central projection. Octagonal ogee-domed cupola in central roof-valley. 2 storeys; 7 bays, with central 1 bay projection, wider with coupled windows in single opening. Sashes with glazing bars in upper blade and with slight segment heads on 1st floor and with rubbed brick arches and prominent rubbed brick keystones on ground-floor. 2 storey 1 bay extension to left with parapetted roof, topped by globes. Irregular fenestration. Brick chimney

to rear with upper stone moulded cornice decoration above blank brick arched panels."

24. This separately listed building was the former staff block. Its architecture reflects the main building but in a more subservient manner, using red brick for dressings in contrast to the stone of the main building. Internal access was not possible due to its dilapidated state, but plans show there have been alterations to its historic plan from which have compromised its architectural interest. It is primarily the external appearance of the building which contributes to its significance.
25. There is some illustrative historic interest found in its contribution to understanding how the site was originally managed, showing the necessary ancillary buildings and functions associated with the running of the care home.
26. The grounds and setting of this building are less formal, in comparison to the grounds immediately in front of, and to the west of, the Rustington Convalescent Home. This is reflective of the more functional character of the northern part of the site for staff. Here, the more practical functions required are reflected in the amount of hardstanding surrounding the buildings.
27. Where the former gardens remain they are heavily overgrown and have lost all of their former planting and much appreciation of their layout and function. This has been detrimental to the setting of the building.



Figure 10: Western Elevation of the Laundry Block

Visual Surroundings

28. There are several views across the application site which allow an appreciation of the architectural and historic interest of the buildings and their surroundings. These were identified by Morse Heritage as 'Key Views' within the previous application:⁴

Key View 1

"View of the Home as seen from beside the entrance gates in the south western corner of the site. This is the first view of the Home seen when approaching along Sea Road from the west. This is also the first view of the site at point of arrival for visitors, as the main central driveway in front of the Home is not open to traffic at present."

Key View 2

"This view looks directly towards the front elevation of the listed building, along the axial north-south pathway in the front of the Home. The wide expanses of lawn which make up the principal setting of the Home frame the view of the building. It is a formal view of the listed Home found within the site and a key public view, from Sea Road."

⁴ Key view maps have been replicated from the Morse Heritage Statement Addendum

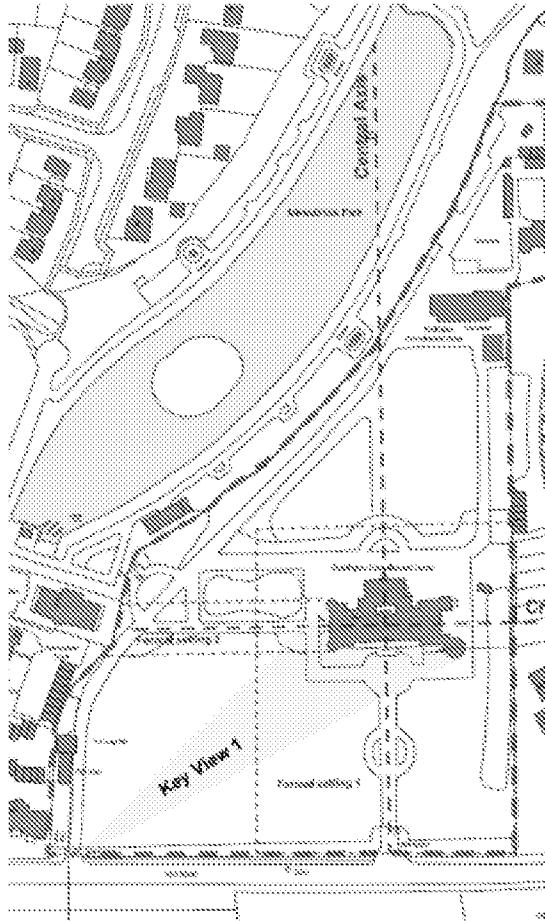


Figure 11: Key View 1

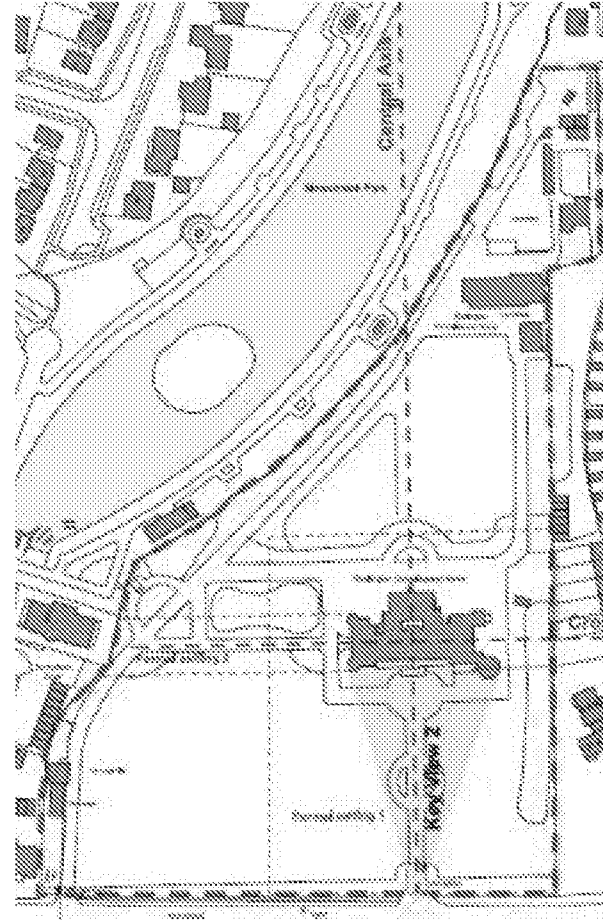


Figure 12: Key View 2

Key View 3

"This viewpoint comprises an angled view of the front elevation of the listed building, seen across the wide expanse of its southern lawn setting. In the distance, looking along the east side of the Home, can be seen the historic Laundry and Cook's Cottage, characterised by a decorative gabled and chimneyed roofscape. Modern three storey housing located on the neighbouring plot is also prominent in the eastern part of this view."

Key View 4

"This viewpoint comprises a long view of the west elevation of the listed Convalescent Home, as seen when looking along a historic path."

Key View 5

"This comprises a long view of the rear elevation of the listed Convalescent Home, as seen standing directly to the south of the historic Laundry building."

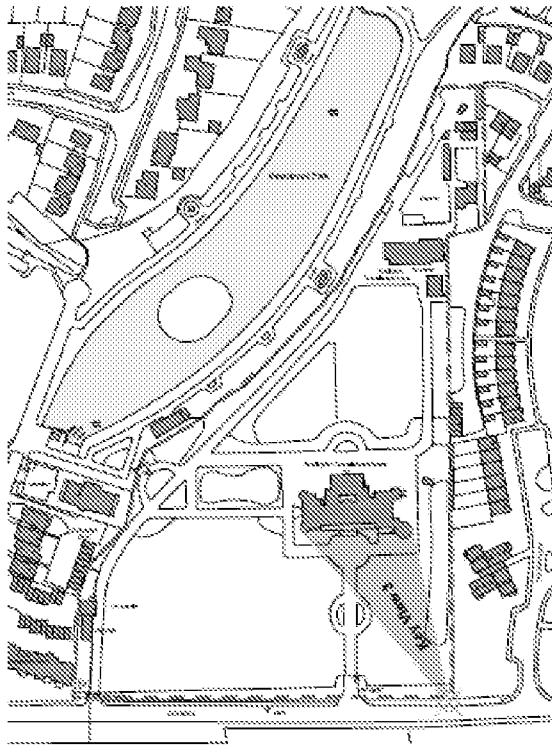


Figure 13: Key View 3

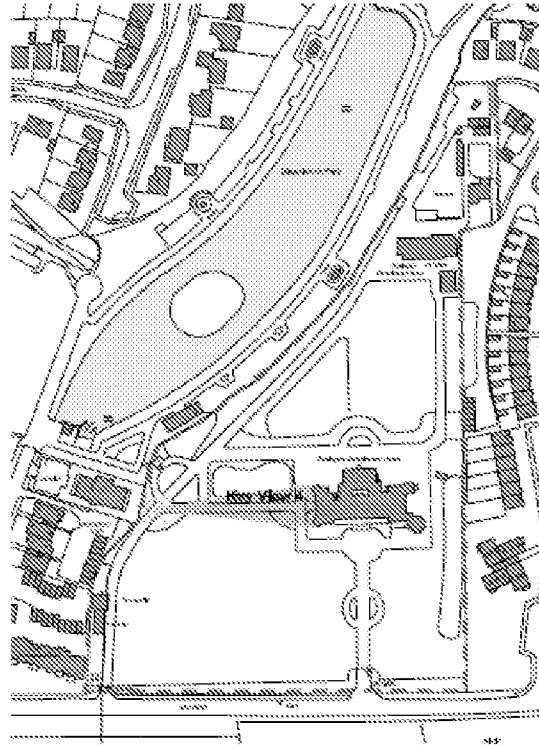


Figure 14: Key View 4

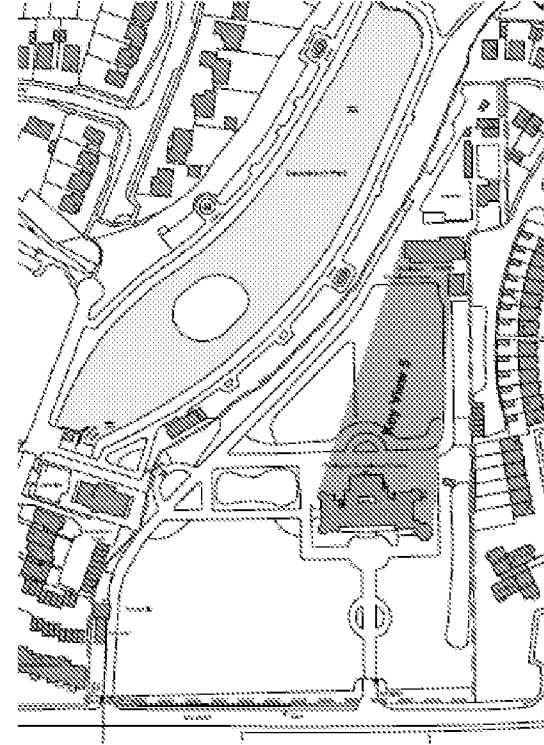


Figure 15: Key View 5

Proposed Revisions to Previous Permission

29. This application seeks to increase the number of new residential units from 33 new dwellings to 37 by changing the permitted masterplan layout to incorporate three additional units within the grounds and by changing the internal first floor layout of the laundry building to fit in one additional unit.
30. The amended proposed layout seeks to provide a better relationship with neighbouring properties and maximise the saleability of the new houses to ensure the funds required to bring the listed buildings back into a habitable state can be raised. Thus securing their long term future in their optimum viable use, as acknowledged by the previous permission.
31. Changes required to achieve this are outlined below with further detail and justification provided within the Design and Access Statement prepared by Placebuilder Architects:
 - Block A is rotated 90 degrees to face south, with one house added;
 - Road layout on west side of Convalescent Home amended;
 - One house added to the north end of Block C;
 - One house added to the south end of Block D;
 - Block D moved 1.5m west away from the site boundary;
 - Block E and F paired to create semi-detached houses (also increased to be three bed properties);
 - Removal of communal refuse store;
 - Changes to the external design of Block D including brick detailing to create texture and reference to its historic setting and reducing the roof pitch; and
 - New gable feature to front elevation of Blocks E and F to reference the historic buildings.

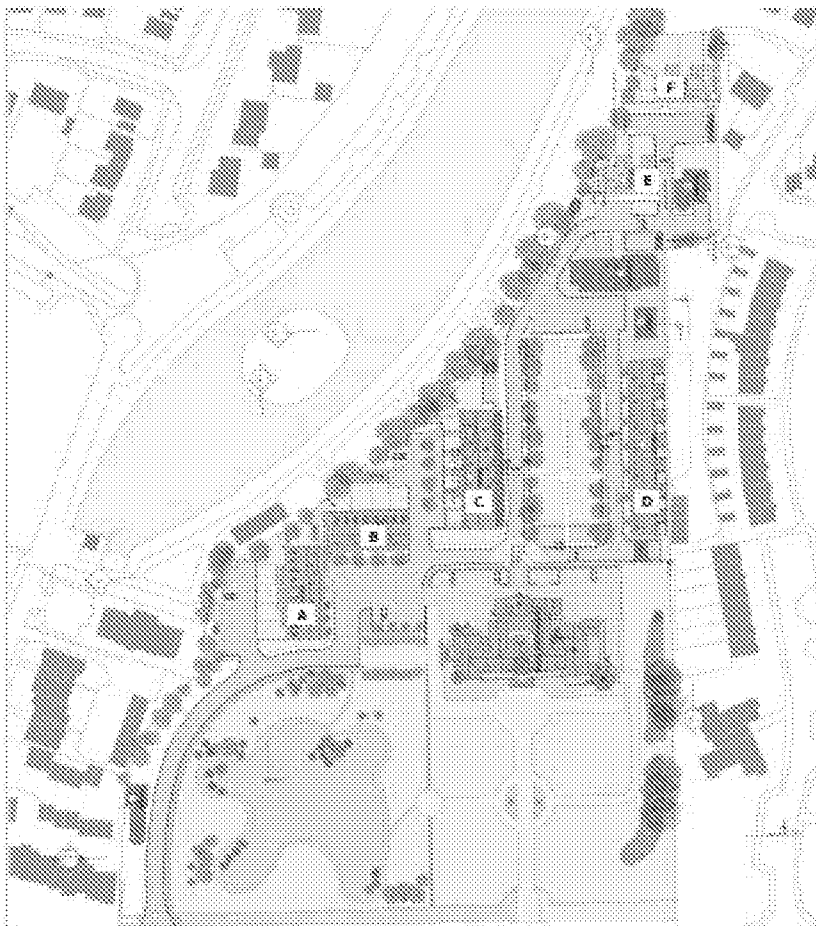


Figure 16: Consented Layout (LPA Ref: R/83/15/PL)

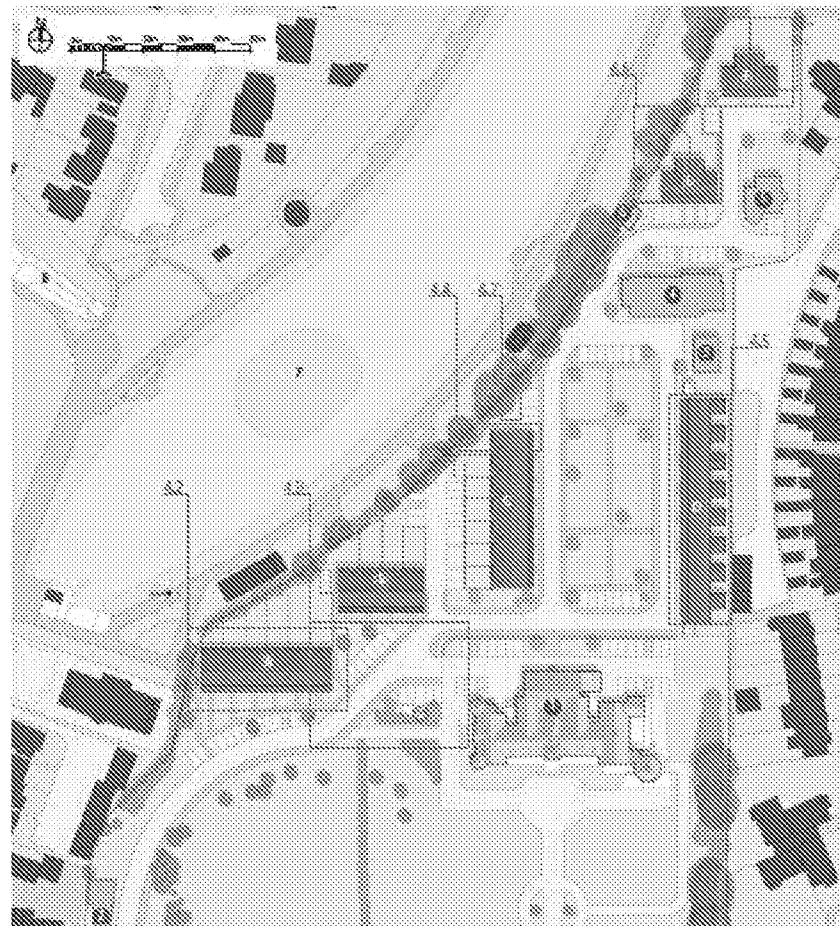


Figure 17: Proposed Layout

Effect of the Previous Permission on the Heritage Assets

32. It was established in the previously permitted application (R/83/15PL) that:

*"Any damage to the setting of the listed building is offset by the derived finance which will facilitate its long term retention and maintenance and use (the optimum viable use)."*⁵

33. The response from the conservation officers at the time was:

"The addendum also recognises that there is harm to the setting of the listed building which it regards as 'less than substantial'. This would be on the basis that a primary significance is not being lost by the proposals. We would agree with this assessment and to this end would advise that the test arising in paragraph 134 of the NPPF [Now paragraph 196 of the NPPF 2018] will need to [be] considered in the planning balance."

34. The proposed development within the grounds of the Convalescent Home and the slight internal changes to the laundry were considered acceptable given that it would secure the optimum viable use of the site. The Heritage Statement Addendum outlined how the previous proposals had mitigated the effect of the proposed development through design to ensure that the effect of the new housing would be less than substantial. These mitigation measures included:

- Preservation of the large rectangular garden area to the north-east of the listed building as an area of open green landscaping;
- The reinstatement of an attractive, formal, planting scheme within the rectangular north eastern garden as well as in the north-western triangular garden area;
- Historic pathways to be preserved;

⁵ Committee Report for the permitted application (LPA Ref: R/83/15PL)

- New residential buildings (to the northern landscape) will reinforce historic boundary lines between and around the historic garden zones;
- Significant formal historic views will not be obscured;
- New development would be spread out across the northern and western parts of the site to avoid an overly dense appearance of new buildings; and
- The proposed buildings would be clearly subservient to the listed Convalescent Home.

Effect on Key Views from the Revised Layout

Kew View 1

35. There will be a noticeable change to this view due to the proposed reorientation of Block A. In views from the south-western corner of the site the principal southern and western elevation of the Convalescent Home is visible across the large open lawn. Views to the rear of the site are partially obscured by the existing tree and bush coverage. In the proposed new landscape plan this will be thinned to provide a more open character to the front lawns of the Convalescent Home which will increase visibility of the new housing. The increased visibility will be minimal in terms of the difference between the permitted scheme and the revised layout and allows for a more faithful landscaping approach to the front lawn (south-west of the listed building) while securing an improvement to the area in front of Block B by the introduction of green open space. As such, there would be no material change to heritage significance.

Key View 2

36. This vista toward the south, principal, elevation of the Convalescent Home from Sea View Lane is the most sensitive in heritage terms. As was the case with the previous planning application this view will change as a result of the presence of development to the west of the Convalescent Home. The slight increased visibility of built form as a result of the revised layout will

not have a notable effect over and above the previously identified harm that will arise from the introduction of the permitted new housing.

Key View 3

37. The change resulting from the reorientation of Block A in this view (from the south-eastern corner of the grounds looking north-west) will be negligible in comparison to the permitted layout. Thus, a minor harmful effect will result, but it will be no greater than the effect of the permitted scheme.

Key View 4

38. As a designed view of the Convalescent Home from the west, Key View 4 is sensitive to change, although less so as a result of changes to the formal garden and footpath within this area of the setting of the building. This is again an area where the revised orientation of the new buildings would make them more visible in views toward the main Convalescent Home. In this instance the new orientation of the buildings would serve to channel views toward the listed building thus mitigating the increased visibility of the new built form.

Key View 5

39. Key View 5 is a long view looking south toward the rear elevation of the Convalescent Home, as seen when standing directly to the south of the historic Laundry. There will be a negligible change to this view as a result of the revisions to the permitted proposals. The previous Heritage Statement Addendum acknowledged the change to the view, highlighting the fact that this would be mitigated by the benefits of the proposals, which would reinstate a previously lost landscaped garden. The introduction of an appropriate form of new development, in keeping with the former use of the site was also acknowledged. These benefits would still be provided by the proposed revisions and no additional harm is identified.

Effect on Setting of the Heritage Assets

40. Although there will be greater visibility of Block A, due to the orientation shift and additional unit, the new buildings have been sympathetically designed and located to mitigate their increased visual presence within the surroundings of the listed building.
41. Due to the increased level of built development and the erosion of an appreciation of the former spacious open character of the site, there will be a slight effect on its historic interest as a care home that provided a rural retreat. However, the new housing is primarily proposed to be within areas that have already undergone change and retain little, if any, of their previous landscaped grounds.
42. The additional dwellings and the reorientation of block A will not result in a more harmful effect than that identified for the previously consented development. The change would still be within the less than substantial bracket of harm as defined by paragraph 196 of the NPPF.

Direct Effects on The Laundry

43. The reconfiguration of the consented first floor layout within the Laundry building will allow for an additional unit. Changes proposed are within a currently open plan area where the historic plan form has been entirely lost. New partitions will provide an efficient division of the first floor space (ensuring the maximum occupation to increase the viability of the development and upkeep of the buildings). The works are assessed as preserving the significance of the listed building because the additional partitions required to allow this floor to function as two separate flats will have no effect on heritage significance. No additional harm would arise as a result of this change.

Summary

44. This Heritage Statement Addendum has been produced by Heritage Collective to support a Section 73 application to amend the previously

permitted application to the previously permitted development within the grounds of the grade II listed Rustington Convalescent Home and Laundry Block (Formerly the Staff Quarters Block). A previous permission (LPA Ref: R/83/15PL) allowed 26 new homes in the grounds, the reuse of the laundry building to provide 5 apartments, reuse of the cook and carpenters houses to provide two dwellings and a rear roof extension to the main house to create 4 new bedrooms. This application seeks to marginally increase the amount of built form by introducing three new buildings within the grounds of the Convalescent Home and one additional unit within the laundry building.

45. Revisions to the previously granted permission allow for an improved layout to the site and respond to consultees concerns as part of the previous application. These changes will improve the viability of the proposed development and ensure the long term optimum viable use of the listed buildings while preserving those elements of setting which contribute to the significance of the Convalescent Home and Laundry.
46. The proposed new development will not result in an increase in the level of less than substantial harm previously identified as resulting from the proposed development.