# Heritage Statement

Subdivision, replacement doors and internal alterations

## LGF Flat 3, 118 Marine Parade, Brighton, BN2 1DD

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#### 1.0 INTRODUCTION

This Statement is submitted in support of a proposal for planning and listed building consent for the reinstatement of Lower Ground Floor flat 3 back into two separate flats 3a and 3b, replacing some non-original doors, and altering the layout and entrance location of 3b. The Planning Policy background is considered along with an assessment of the proposal considering the relevant policies and all other material planning considerations.

#### 2.0 SITE AND SURROUNDING AREA

11-7-119 Marine Parade is a listed Grade II property built as a terraced house which later formed part of the former Clarges Hotel. It was originally 4 storeys including basement, with full height bowed facades, faced in painted stucco with timber sash windows that are now of Victorian pattern with associated railings and balconies in the East Cliff Conservation Area. East Cliff Conservation Area rose out of the rapid growth of Brighton after 1750 and its architecture is very typical of the Regency style with buildings, painted shades of cream to reflect stucco's original objective of imitating stone and offering a unified appearance. The building dates from c.1825 and is attributed to Busby and Wilds.

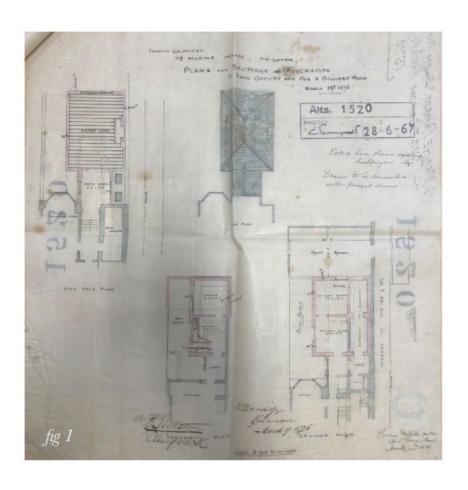
It is clear from planning history that extensive conversion has taken place at the rear of 117-119. Its location on the north side of Marine Parade in a prominent and the heritage asset forms part of a group with Nos 111-119, 122-133/133a and the whole of Marine Square. As such, its significance lies in remaining architectural significance, historical significance as part of a group and the townscape value of the facades within the Conservation Area. Communal significance can is also noted, in terms of past use as a hotel and film set. Significance has been eroded as a result of the substantial alterations at the rear and the later addition of penthouse flats.

117-119 Marine Parade currently consists of 29 flats over 5 floors, including: basement and penthouse flats in the 1980's. The building was then converted into residential flats in the late 1980s. Lower Ground Floor Flat 3 is now classified as 118, but in fact lies mainly beneath 119. It is accessed via the basement of the 117/118 building and then through a rear courtyard which provides a lightwell for 12 flats to the rear of the 117-119 building.

#### 3.0 PLANNING HISTORY

In a Planning Application dated 14th March 1876 the plan shows that the lounge of 3a was a kitchen for 119. The kitchen of 3b was a lobby, and the bedsit room was a scullery with a larder behind. The bedroom and bathroom of 3a are thought to have been wine cellars. Later the wall between the scullery and larder was removed (it is proposed to reinstate this wall) and the window from the scullery was blocked off (it is proposed to use this as a position for the new door).

There are no subsequent applications stored at The Keep to show how it went from service rooms to accommodation. However there are currently two front doors, two separate electricity and water supplies to the flat and it was clear that it was at some point converted from a scullery and kitchen into to two flats and re-assigned to 118. There is also no record at The Keep of when it was re-classified as a single flat. There are no applications relating to this flat on the Planning Portal.



#### 4.0 THE PROPOSAL

The proposal seeks full planning consent for works to lower ground floor flat 3 of the existing grade II listed building of 118 Marine Parade and to reinstate it as two flats.. The proposal seeks to:

- 1. Replace the adjoining door between the two flats with a plastered breezeblock wall, with skirting to matching the existing. (No other changes are required to reinstate them as 2 separate flats as they were never properly joined.)
- 2. Assign the address 3a to the larger flat and 3b to the smaller flat, to avoid current confusion with two other Flat 3's at 117/118 and one at 119.
- 3. Flat 3a (originally kitchen and wine store)
  - a. Replace the non-original broken aluminum sliding doors with wooden French doors (details shown in the drawings and photos).
  - b. Add a section of fence, matching existing fence, to the courtyard to allow some privacy to the area outside the French doors.
- 4. Flat 3b (originally lobby, scullery and larder)
  - a. Reinstate the walls that were between the original scullery and larder, to form a separate bedroom and lounge.
  - b. Remove the non-original stud walls around the shower room.
  - c. Move the front door position from the current kitchen to the lounge area, in the position of the original scullery window (no longer present).
  - d. Swap the location of the kitchen and bathroom.
  - e. Replace the non-original wooden glass paned entrance door with a similar one of higher quality (details shown in the drawings and photos).
  - f. Install a wooden box sash window (details shown in the drawings and photos) where the old front door was, to provide light and ventilation for the new bathroom. Block off section below window..
  - g. Replace the two non-original internal flush doors with wooden 6 pane doors (details shown in the drawings and photos).

#### 5.0 PLANNING POLICY

#### **National Planning Policy**

The National Planning Policy Framework (NPPF) sets out that there is a presumption in favour of sustainable development and that this should run through both plan making and decision taking. In terms of the determination of planning applications this should mean the approval of developments that accord with the development plan without delay, and that where the development plan is silent or relevant policies are out of date, that permission be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or policies of the NPPF indicate otherwise.

Sustainable development is seen within the NPPF as having three roles, namely an economic, social and environmental role in both plan making and decision taking.

National planning guidance relevant to the determination of the Appeal will be considered with reference to the following documents:

- National Planning Policy Framework (NPPF)
  - Section 2 Achieving sustainable development
  - Section 12 Achieving well-designed places
  - Section 16 Conserving and enhancing the historic environment
- National Planning Practice Guidance (NPPG)

Paragraph 189 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 193 of the NPPF 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

The following sections within the NPPF are important factors in the assessment of the proposal:

- Section 12 Achieving well-designed places
- Section 16 Conserving and enhancing the historic environment

#### **Local Plan**

In terms of the local planning policy context for the site, the relevant Development Plan for the Brighton & Hove City Council is composed of the following relevant documents:

- Brighton & Hove City Plan Part One
  - SS1 Presumption in Favour of Sustainable Development
  - o CP12 Urban design
  - o CP15 Heritage
- Brighton & Hove Local Plan (retained policies March 2016):
  - HE1 Listed buildings

Summary of Relevant Design & Conservation Policies and Documents:

The NPPF and NPPG. Historic England GPA Notes 2 and 3.

City Plan Part One policy CP15 (Heritage).

Local Plan policies HE1 (Listed Buildings),

HE3 (Development affecting the setting of a listed building),

HE4 (Reinstatement of features on a listed building) and

HE6 (Development within or affecting the setting of Conservation Areas),

QD14 (extensions & Alterations).

Submission City Plan Part 2 policies DM26 (Conservation Areas),

DM27 (Listed Buildings),

DM29 (The Setting of Heritage Assets).

SPD09 Architectural Features.

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#### 6.0 PLANNING ASSESSMENT

#### Impact upon the Listed Building

The special character of the grade II listed building is its form as part of the terrace of four and five storey height with their full height circular bay windows. The building has a slate tiled roof and forms part of a terrace with No.115, 116, 117 & 118, which all previously formed Clarges Hotel, converted to residential in the late 1980s. The hotel was notably owned by former actress Dora Bryan and was famously used in the film 'Carry on Girls'. The building has a blue plaque to commemorate Dora Bryan living in and owning the building.

The former hotel is dated around the early 19<sup>th</sup> century, probably designed by Amon Wilds and Charles Augustin Busby. No.115 & 116 form a separate residential building with No.117-119 forming 29 flats. Like many properties along Marine Parade, the building is set back from main road allowing parking to the front of building.

The changes will have no impact on the exterior of the building, as it is not visible to the public, and can only be seen by the 12 flats who share the lightwell for their secondary rooms.

- First Floor Rear Flat 3, Pool flat, GF Flat 1 & Flat 3 119 bedroom only
- Flat 17 = bedroom and bathroom
- Flat 9, 11, 12, 14 & 15 kitchen and bedroom
- Flat 16 kitchen, dining room and bedroom
- Flat 10b bedroom and dining room

#### 7.0 CONCLUSION

It is considered that the proposed works, given their scale and location, would have less than substantial harm and would not cause significant impact, thereby preserving the special character of the Listed Building and therefore in accordance with Policy CP15 of BHCC City Plan Part One and Policy HE1 of Brighton & Hove Local Plan (2005) and the aims of the NPPF.