

Bexhill Heritage

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Caring for Bexhill's past,
present and future.

Bexhill Heritage

Raymond Konyon BA (Hons) – Chairman

c/o St. Barnabas Church

Sea Road

Bexhill-on-Sea

TN40 1JG

4th January 2018

Dear Mrs Shepherd,

I write as chairman on behalf of Bexhill Heritage.

At a committee meeting 3rd January 2018, this planning application was discussed in depth and as a result, we submit the following comments:

- 1). Although the applicant has clearly made a considerable effort to address some of the issues of his previously refused application, Bexhill Heritage wish to strongly object to this revised planning application on heritage grounds for which nothing has changed.
- 2). The existing property contributes positively to the Bexhill Conservation Area, as a relatively large Victorian building that belongs to the town's main phase of development around the turn of the century. As a typical building for the wider area, its retention is desirable to maintain the coherency and historic character of the townscape - exactly the reasons why it was designated a conservation area in the first place. The building is clearly of some importance to the Conservation Area, even if it is not individually outstanding – it is the critical mass of buildings of a similar age and quality that is significant, and this should not be eroded. There is thus a strong presumption in favour of refusal of this application on heritage grounds and legislation and policy is resolutely clear on this.

The Planning (Listed Buildings and Conservation Areas) Act 1990 states that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’ – the proposals will not preserve or enhance the character or appearance of the area. Paragraph 132 of the NPPF states that ‘great weight should be given to the assets conservation’, which in this case is the Conservation Area and conservation means preservation. Paragraph 138 of the NPPF stipulates that the ‘loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated as substantial harm under paragraph 133 or less than substantial harm under paragraph 134.’ Substantial harm is a very high test; Planning Policy Guidance paragraph 018 states that ‘if the building is important or integral to the character or appearance of the conservation area then its demolition is more likely to amount to substantial harm to the conservation area’. Regardless of whether the harm is considered to be substantial or less than substantial in this instance, it is a high level of harm and this must be outweighed by considerable public benefits in both cases. We suggest that a new hotel on its own is not a strong enough public benefit where there is no need since adequate accommodation facilities already exist within the town and which falls short of outweighing the Council’s default position to refuse this application on heritage grounds.

3). At appeal, The Planning Inspectorate was very thorough and clear about what criteria exactly forms the character and appearance of the Designated Conservation Area which aligns with RDC’s Conservation Area appraisal. There is a statutory requirement under the planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the preservation or enhancement of it. The demolition of the two traditional Victorian two-storey villa houses 10-12 Egerton Road which are situated within the Designated Conservation Area would contravene the default policies OSS4 and EN2 of the Rother District Local Plan – Core Strategy 2014, which are resolutely clear.

4). Such precedent if granted, would be of concern due to the likelihood of copy-cat developer applications within the Designated Conservation Area.

5). Bexhill Heritage would like to refer you to RDC’s refusal of planning application RR/2014/2093/P regarding No. 9 Egerton Road which requested the replacement of timber sliding sash windows for UPVC windows. This precedent clearly demonstrates the Local Planning Authority’s obligation to ensure that all development is

satisfactory and sensitive to the character and appearance of the Conservation Area or at the very least has a neutral impact upon it. This revised planning application would do neither. If removal of timber sash windows opposite at No 9 Egerton Road was declined on these grounds, how could the complete demolition of 10-12 Egerton road be entertained?

6). Point 13 of The Planning Inspectorate Appeal Decision clearly explains why the adjacent Landmark building sets no precedent for accepting this planning application.

7). The revised proposal is one storey lower than the previous declined application however, the abruptly increased height, overbearing bulk, overshadowing and massing would still fail to reflect the predominant townscape in the vicinity, with the effect that it would appear as a harmfully obtrusive and uncharacteristic element in the conservation area being noticeably higher than them, and would as a result appear oddly over-scaled.

8). If Mr Cook is insistent on building a hotel for the town which is certainly an admirable goal, Beeching Road would be an ideal location. It is close to the town centre; lies on the proposed regeneration of the London Road Gateway into the town and would be within the identified Beeching Road regeneration zone and would be within walking distance or a short taxi ride from the De La Warr Pavilion.

Bexhill Heritage trust that these points will be taken into consideration by the planning committee towards a decision of refusal.

Yours sincerely,

A handwritten signature in cursive script that reads "Raymond Konyn".

Raymond Konyn BA (Hons) – Chairman, Bexhill Heritage