

Consultation Summary - Sompting Conservation Area

This report summarises the representations received and the Officers' responses.

The Council received **6** representations. These included:

- **2** representations from local residents
- **1** representation from Sompting Parish Council
- **1** representation from Historic England (statutory consultee)
- **1** representation from National Highways (statutory consultee)
- **1** representation from Adur District Community Advisory Group
- **1** representation from Strutt and Parker (on behalf of Sompting Estates and Persimmon (Thames Valley))

The issues raised in these representations are presented below, along with Officers' responses to these comments.

The two representations from local residents were submitted using the online consultation form. The results are summarised below

Residents of the Conservation Area

Question 1: In general, has the draft Character Appraisal adequately identified the Conservation Area's special architectural or historical interest?

- Both respondents agreed that it had done this, and there were no further comments.

Question 2: Do you think the Conservation Area has any other aspects of special interest which should be included in the appraisal?

- Both respondents agreed that the character appraisal had adequately identified the special interest of the Conservation Area, and there were no further comments.

Question 3: In general, has the Appraisal adequately identified the good and the harmful features of the Conservation Areas?

- Both respondents agreed that the character appraisal had adequately identified the good and harmful features of the Conservation Area, but did make further comments.

Additional Comments submitted by residents:

- I think the document clearly shows that Sompting heritage conservation is poor at best.

Officer Response – Noted.

- The Appraisal does seem obsessed out of sensible proportion with uPVC windows. It's unhelpful if a conservation area tries to freeze all progress. By the same count, would houses in the area be allowed visible solar panels? They should be allowed because they are increasingly important.

Officers Response - The appraisal notes that most of the original windows have been replaced. This loss of traditional architectural features and traditional materials harms the character of the conservation area. However the appraisal does not propose any further controls on replacement windows.

The management plan proposes an Article 4 Direction. If implemented, this restricts permitted development rights, including the installation of solar panels. This means solar panels would require planning permission.

Question 4: Do you think the Conservation Areas have any additional good features which should be identified in the Appraisal?

- Neither resident identified any good features that had been missed from the Appraisal. There were no additional comments.

Question 5: Do you agree with the management proposals set out in the draft Character Appraisal?

- One resident agreed but the other did not.

Additional comments:

- We are in the midst of a climate crisis, with net zero ambitions and I think you are completely bonkers for suggesting restrictions around solar panels and other sustainability improvements. Heritage is a privilege, we have no future if the council restricts carbon reduction.
- I would be concerned if there were attempts to block developments that are clearly of public benefit, specifically addition of items such as solar panels and double glazing.

Officers Response - The UK has committed to reaching 'net zero carbon' by 2050. Adur District Council declared a Climate Emergency in July 2019. As part of this declaration we made a commitment to work towards being a carbon neutral council by 2030 and to be Net Zero carbon by 2045.

Adapting to climate change and conservation of built heritage are compatible aims; we do not need to accept the loss of heritage to achieve our climate goals. Conservation is, by definition, the process of managed change which sustains significance.

The management plan proposes an Article 4 Direction. If implemented, this restrict permitted development rights, including the installation of solar panels.

The withdrawal of permitted development rights does not necessarily mean that planning consent will not be granted. It simply means that an application must be submitted, so that the local planning authority can examine the plans in detail. All planning decisions must be made in accordance with national and local policies, taking material considerations into account.

The council is producing a design guide for all conservation areas in Adur that will address energy efficiency for historic buildings.

Question 6: Are there any other actions that you consider are needed to preserve or enhance the Conservation Area?

- One resident agreed but the other did not.

Additional Comments:

- Provide funding for listed houses or conservation areas to improve their impact on the environment whilst preserving heritage.

Officers Response - Conservation area status does not attract any additional funding. Maintenance and improvements to properties are the responsibility of the owner.

Question 7: Please provide any further comments on the draft Sompting Conservation Area Character Appraisal

- Bizarre that we have a conservation area, but then County Council or Highways could make any change they want. More joined up thinking is needed

Officers Response - Highways authorities carry out works under a legislative framework separate to the planning system. Both National Highways and the local highways authority are required to have regard to the conservation area.

Sompting Parish Council

Sompting Parish Council agree with the recommendations in the management plan. Additionally the parish council made the following comments:

- Infrastructure and public realm: Agree and stated needs to be monitored closely.
- New development & alterations to existing buildings within the conservation area: Committee feel that in future this should be monitored more closely and planning permission to be needed for anyone replacing windows.

Officers Response – Noted to both comments

Historic England

Historic England made a series of comments:

- We welcome the inclusion of an introduction in the draft conservation area appraisal that sets out the purpose of designation, as well as legislation and policy context. However, it would be useful to add sections concerning the appraisal methodology and the public consultation that has been carried out for drafting the document. We would recommend placing this section before the ‘Summary of Significance’ to offer general, preliminary information about the conservation area. This section would also benefit from the inclusion of a hatched map to provide an immediate visualization of its boundary.

Officers Response - Noted. The methodology is set out in a separate document, which is available on the councils website. The public consultation process for conservation area character appraisals is set out in the Statement of Community Involvement.

- Summary of Significance As mentioned above, we suggest locating this paragraph after the ‘Introduction’. This section should provide clear and immediate information about what is significant about the conservation area in terms of history, appearance, character and setting. As such, it would benefit from a more succinct format and the use of bullet points for highlighting the key elements which contribute to the special interest of the area. It would be more appropriate to place detailed information currently included in this summary into relevant sections within the main body of the document where more exhaustive details on specific topics could be found

Officers Response – Noted. The Summary of Significance is intended to provide a quick guide to what is significant about the conservation area, rather than form part of the main body of the text. Therefore it remains at the start of the document

- Character Analysis. This paragraph opportunely considers the character of the conservation area as a whole, and covers different aspects including building types, materials, boundaries, streetscape and important views.

Officers Response – Noted

- Setting and Views. We welcome the inclusion of this section within the draft conservation area. However, in order to strengthen the protection of these views, this section would benefit from being expanded to include a clearer list of them cross-referenced to a relevant map. It would be also useful to explain the types of views (such as views out to the setting, views of street frontages and groups of buildings or views of key landmarks) that are distinctive of the area’s character and contribute to its historic or architectural interest.

Officers Response - Noted. This section describes a number of views. Some of these are illustrated in photographs and on the map in the document. The council is carrying out separate Landscape Character Analysis as part of the preparation of the Adur Local Plan update.

- Unlisted Buildings of Merit (Locally Listed Buildings). These heritage assets are identified on the appraisal map only. However, it would be beneficial to list them and provide photographic illustrations, as well as description of their significance and justification for their inclusion. This would ensure their qualities are fully explained and transparent.

Officers Response - Noted. Adur does not have a locally listed buildings.

- Detracting Elements. Similar to positive contributors, the detracting elements are currently illustrated on the appraisal map only. We recommend provision of a clear list of them accompanied by photographs and explanation of the reasons why these buildings are detractors.

Officers Response – Noted

- Character Areas - We welcome the identification of character zones within the conservation area. This is a useful tool to use when describing a conservation area whose character varies across the entirety of its extent and may be useful as a management tool for the area in the future. However, for ease of reference, we think it would be more opportune to present this paragraph as a separate section, following the general description of the main characteristics of the conservation area in the preceding 'Character Analysis' section.

Officers Response - Noted. The character areas are very clearly identified.

- Issues & Opportunities and Management Recommendations. These sections are a great opportunity to integrate to the fullest extent Historic England Advice Note 1 (HEAN1): Conservation Area Appraisal, Designation and Management (2019, second edition), which can be viewed online here: [Conservation Area Appraisal and Management, Historic England Advice Note 1](#)
It would be opportune to locate within these sections photographs showing examples of the negative impacts threatening the conservation area special interest, which are currently appended to the 'Character Analysis' section of the document. These examples would help inform building owners and potential applicants on the management of their property, as well as provide a guide for future monitoring and enforcement.
There may be areas of guidance which would add further value to the draft, such as opportunities to address climate change and opportunities for increased community engagement and potential future co-production. We suggest you consider this.

Officers Response – Noted. This conservation area character appraisal has been carried out

in accordance with the latest guidance from Historic England. The council is producing a design guide for all conservation areas in Adur that will address energy efficiency for historic buildings.

National Highways

In reference to the Sompting conservation area, National Highways noted that no boundary changes are proposed. No further comments were made in this regard.

Adur District Community Advisory Group

- North Sompting conservation is solely managed by SDNPA. Will the Adur team be liaising with the SDNPA on any comments submitted for North Sompting?

Officers Response - Yes. The appraisal has been produced jointly by Adur District Council and the South Downs National Park Authority.

- 4.19 The development mentioned to replace the Marquis of Granby public & house is now complete. You may wish to include that (with a picture?) within the final conservation document. The materials used for this have particularly picked up the local vernacular of red brick and flint.

Officers Response - This paragraph has been updated to reflect the completion of this development.

- 5.2 The suggestion that Sompting Abbotts School with its considerable number of heritage buildings could be approached to carry out a Conservation Management Plan is a welcome proposal to further protect those holdings

Officers Response - Noted

- 6.8 Totally support the production of a Design Guide. There is more comment & below on this to do with its promotion to Sompting community and planning applications which come forward plus co-operation with other stakeholders like highways, utilities etc.

Officers Response - Noted

- 6.12 Once again agree that all stakeholders (Highways, utility providers etc) should be included as a section in the Design Guide.

Officers Response - Noted

- 6.13 Agree. The Design Guide can play an important role in ensuring conservation & standards are being met

Officers Response - Noted

- 6.16 Agree with the recommendation that officers' planning considerations on planning applications do comply with all the relevant legislation and guidance. More comments below on this.

Officers Response - Noted

- 6.17 Agree with the recommendation. However, it should be noted that those fields to the southwest and to the west of Upton Farm are now designated as an allocation for 123 homes within the now adopted Worthing Local Plan. This was a matter raised as an objection to this allocation by CPRE Sx at the plan examination for fears of coalescence of east Worthing with Sompting and impacts on Sompting conservation area and its nearby listed buildings. Despite this, the Inspector approved the allocation on the basis of a solid landscaping buffer to mitigate for these concerns.

Officers Response - Noted This paragraph has been amended to reflect the site allocation in the Worthing Local Plan. This acknowledges the importance of the landscape setting of the village.

- 6.18 Agree with this recommendation as commented in 5.2. Presumably this will entail Adur consulting with SDNPA who have the conservation remit for North Sompting

Officers Response - Noted

- South Sompting Boundary - May we suggest that the boundary line for South Sompting be extended to include the fields between the north side of the village and the A27 from Church Lane along to the boundary with Worthing? This may help to deter any future 'ribbon' type development which would be detrimental to the setting of the village. Already the green spaces to the west/south west are allocated and will be lost to that development in the Worthing Local Plan which will be detrimental to the setting of that part of the village.

Officers Response - Noted. It is not proposed to amend the conservation area boundary.

- Design Guide. Such a reference document will be invaluable to try and improve understanding of the reason for a conservation area and the need to preserve its heritage aspects. Also to clarify where members of the community are in disagreement over an aspect. At the Public meeting this type of disagreement was evident between two members of the audience over the height/mortar/finish requirement to repair a flint wall in Church Lane. Sompting Parish Council produced such a document to support the then proposed Neighbourhood Plan. That plan was subsequently withdrawn. A copy of that document is attached for your information.

Officers Response - Noted

- A section within the proposed Guide to advise and guide infrastructure providers (highways, utilities etc) on the aims of the conservation area is welcomed.

Officers Response - Noted

- On matters regarding street furniture, power boxes and other such items we ask are there examples of such items which design wise are more in keeping with conservation which could be featured within that section? Or suitable enclosures which could 'disguise' such an item without loss of access/functionality? If not, then there is little one can do to improve the functional nature of these which are currently installed by these providers, other than advise on their location to give less intrusion.

Officers Response - Installation of street furniture and infrastructure is often carried out under permitted development rights. Utilities and telecoms providers must submit a notification for prior approval to the local planning authority, which may approve or refuse details of the siting and appearance of the installation. The 'siting' and 'appearance' of the proposal are the only factors that can be considered under an application for prior approval. No other matters can be considered.

- May we also suggest that reference item 6.16, to better inform planning officers on the subject of conservation, the Authority could run some in-house 'Teach Ins' on the subject and the key considerations they should be giving to a planning application whether for a completely new build or a change/extension to an existing property in the area. It is of course acknowledged that some of the senior officers are well versed in this requirement.

Officers Response - Noted. Development Management officers will be briefed when the design guide is produced.

- For residents living in a conservation area, may we also suggest that a meeting(s) be held in the local parish hall to launch these newly assessed areas when complete to and try and bring some sense of public ownership of their local area's conservation needs and their importance to the area they live in. The design guide would be a key document for them to take away for future reference, particularly when planning any alteration or change to their own property.

Officers Response - Noted. The public meeting was held at the Shoreham Centre as the council was consulting on another conservation area at the same time. Resources did not allow for separate meetings for each conservation area.

- Coupled with a meeting launch, could copies of the Guide be door dropped to every household/business in the conservation area together with accompanying comment as to its use when any property changes and developments are being considered.

Officers Response - The council does not provide copies of planning documents free of charge.

- As an addendum/'tip in' to the Guide, perhaps a document be produced which gives useful lists of companies (suppliers)/organisations (eg Historic England/Adur Planning) who can give advice on/provide materials which are highlighted in the Guide. This may even provide the opportunity to sell advertising space to help fund its production.

Officers Response - The council is not permitted to recommend particular companies or suppliers.

- The assessment notes that the integrity of buildings has been compromised by poor window replacement, often in uPVC not appropriate wood frames not in original materials and flint walls which have been built in the wrong style. Also, fences where there should be flint walls. The design Guide can encourage use of the correct materials and styles of construction and this addendum/'tip' in could direct applicants to sources of supply for these appropriate materials.

Officers Response - Noted

- Enforcement The Article 4 Directive if implemented will strengthen the Authority's hand in achieving appropriate work/material uses for all repairs and It also will enable enforcement to repair such items which have fallen into disrepair.

However, at the meeting the question of enforcement applications to Grade Listed buildings and features like walls within the area was raised by a member of the public and the response seemed to indicate that there was little such enforcement action being carried out.

We are aware that in some areas the Authority does react to a public complaint where a wall or building needs relevant attention, but this aspect appears not to be monitored by the Authority. The question is, with the new reassessment areas and the Design Guide, what will Adur be putting in place to ensure the above sort of issues requiring appropriate attention are attended to?

Officers Response - Noted. The Council will continue to investigate complaints and take enforcement action where appropriate.

Strutt and Parker (on behalf of Sompting Estates and Persimmon (Thames Valley))

- We note that the Conservation Area Appraisal (which is accompanied by a Conservation Area Map identifying individual features) is not intended to support proposals for a revised conservation area boundary but rather as a response to the

duties on the part of the relevant Planning Authorities to keep conservation areas under review. It is therefore confusing to see the Conservation Area Map entitled “Proposed Sompting Conservation Area” and to see the redline area in the key labelled in the same terms. This should be corrected in the published document in final form.

Officers Response - Noted. This will be amended in the final document.

- Relevant Planning Authorities The Sompting Conservation Area was originally designated by Adur District Council, but now encompasses land within both Adur District, and the South Downs National Park in respect of land north of the A27 road (note typological error at 1.3 “Arun District Council”). However, it is also worth noting that the western boundary of the conservation area coincides with the boundary of Adur District and Worthing Borough Councils. Adur and Worthing share planning services, which makes a joined-up approach to policy-making a reasonable expectation. Indeed, it is on such cross-boundary planning issues that this representation will focus.

Officers Response - Noted

- Status of Conservation Area Appraisal. Government advice (PPG reference ID: 18A-025-20190723) is that “a conservation area appraisal can be used to help local planning authorities develop a management plan and plan-making bodies to develop appropriate policies for local and neighbourhood plans. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection.” They are often prepared in the context of the statutory duty to review conservation areas under section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
What is clear from national guidance is that such appraisals are not mandatory, and their value is in helping to develop Local or Neighbourhood Plan policies. This means that such appraisals are not intended to be policy instruments in themselves. They should not be presented, for example, as a supplementary planning document (SPD). It follows that their purpose should be primarily descriptive. This is reflected in the Historic England Guidance on Conservation Area Appraisals¹, as follows:
“A character appraisal defines a special interest of the conservation area that merits its designation and describes and evaluates the contribution made by different features of its character and appearance.” (Para 17).
Given the status afforded to conservation area appraisals, we are concerned about certain statements made in respect of the acceptability or otherwise of development on land adjoining the Sompting Conservation Area and in particular the terms of paragraph 6.17 and the associated recommendation

Officers Response - Noted

- Conservation Area Setting

The setting of a conservation area (like the setting of any other heritage asset) is something which is expressly protected in policy. For example, applicants for planning permission are advised to analyse the significance of heritage assets and their setting and describe how that has informed the development proposals (PPG reference ID 18A-009-20190723). Similarly, the NPPF acknowledges the importance of protecting the setting of heritage assets (see paragraphs 197, 198 and 203). Indeed, the NPPF goes further at paragraph 209 in stating that Planning Authorities “should look for opportunities for new development ... within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably”.

These policy provisions, together with the legislative requirement that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area” (section 72(1)) mean that the decision-making framework around development affecting the setting of a conservation area is already well established.

In this context then, the draft text of paragraph 6.17 and its associated recommendation is not only inappropriate but also unnecessary.

The relevant paragraph states:

“Development affecting the setting of the Conservation Area

6.17 Development on the fields east of Sompting, those north and south-west of Upton Farm, and south of West Steet should be resisted. The surrounding landscape provides a rural context and setting to the conservation area, which has for most of its history relied on agriculture and horticulture. The historic and aesthetic values of the village would be eroded if the landscape setting of the village is diminished.

RECOMMENDATION: That development on the fields east of Sompting, those north and south-west of Upton Farm, and south of West Street and which would erode the setting of the conservation area should be resisted.”

The first difficulty with the above provisions is that these read as planning policies rather than descriptions. As noted above, a Conservation Area Appraisal is not the place to develop planning policy. Insofar as its preparation is subject to consultation, the consultation exercise in itself is not one that ought properly to legitimise planning policy by the back door, as it were.

Secondly, it is apparent that the setting of a heritage asset is something that is protected in planning decision-making by the legislative requirement on the part of the Local Planning Authority to pay “special attention” to conservation areas, and to the policies in the NPPF, which specifically protect the setting of heritage assets. Proposals for development that might impact the setting of the conservation area must be considered on a case-by-case basis and not by reference to a restrictive approach set out in a non-statutory appraisal document intended for quite a different purpose.

Thirdly, the first sentence of the paragraph does not distinguish between different types of development, suggesting that all development should be resisted (although this is subsequently qualified to refer to development which would erode the setting

of the conservation area). This is symptomatic of an ill-considered statement which should be removed from the draft document.

Officers Response - Noted

- Worthing Local Plan Site A14. The inappropriateness of paragraph 6.17 is further demonstrated when the juxtaposition of the Sompting Conservation Area with the land allocation proposed under Policy A14 of the Worthing Local Plan is considered. Site allocation A14 (Upper Brighton Road) identifies two parcels of land (north and south of Upper Brighton Road) for the development of 123 residential units. The Local Plan was adopted in March 2023. The allocation area includes fields to the southwest of Upton Farm.
Paragraph 6.17 specifically states that development “southwest of Upton Farm” should be resisted. In fact, the Conservation Area Appraisal makes no acknowledgement of the proposed allocation of land immediately west and southwest of the conservation area. This is an obvious omission.
This clear contradiction simply illustrates why it would be inappropriate to include paragraph 6.17 and its associated recommendation within the appraisal. The operation of the NPPF (including those positive aspects of paragraph 209) will ensure that the impact of the proposal on the setting in a conservation area is properly assessed.
It is also worth noting that the Conservation Area Map includes an arrow notation outside the conservation area boundary within development site A14, recording an important view from the public footpath from Bramber First School, northeastwards towards the conservation area.
It is noted that the Worthing Local Plan allocation states that development will “protect, or provide suitable diversion for, public footpath 3135”. Given the possibility, therefore, that development will introduce the potential to achieve different or additional views towards the conservation area, we believe that the arrow designation on the footpath should be removed from the Conservation Area Map. Indeed, the terms of A14(g) require development to “protect nearby heritage assets (including Sompting Village Conservation Area) and ensure that no unacceptable harm is caused to them or their settings”.
One of the challenges in the conservation area is of course achieving an appropriate movement strategy and we note that the Conservation Area Appraisal acknowledges WSCC’s consultations in improving cycling and walking in the area. The Estate and Persimmon are jointly focused on achieving a satisfactory outcome in that regard.

Officers Response - Noted. Paragraph 6.17 has been amended to reflect the site allocation in the Worthing Local Plan. This acknowledges the importance of the landscape setting of the village. The arrow indicating the view from the footpath to the village has not been removed. This has been identified as a significant view by the independent heritage consultant.

- Summary6.17 and its associated recommendations should be removed from the appraisal. In addition, the arrow in the southwest corner of the Conservation Area Map (which sits on the land allocated for development in the Worthing Borough

Local Plan under Policy A14) should be removed, given the potential for change in that location arising from the adopted Local Plan proposals.

Officers Response - Noted. Paragraph 6.17 has been amended to reflect the site allocation in the Worthing Local Plan. This acknowledges the importance of the landscape setting of the village. The arrow indicating the view from the footpath to the village has not been removed. This has been identified as a significant view by the independent heritage consultant.

