



Old Rectory **Luddesdown Road** Luddesdown DA13 0XE38

HERITAGE ADDENDUM

with comments on archaeology

*To be read in conjunction with the Planning & Design Statement submitted separately
in support of householder planning application ref. no: 20231283.*

PP-12605499
JANUARY 2024

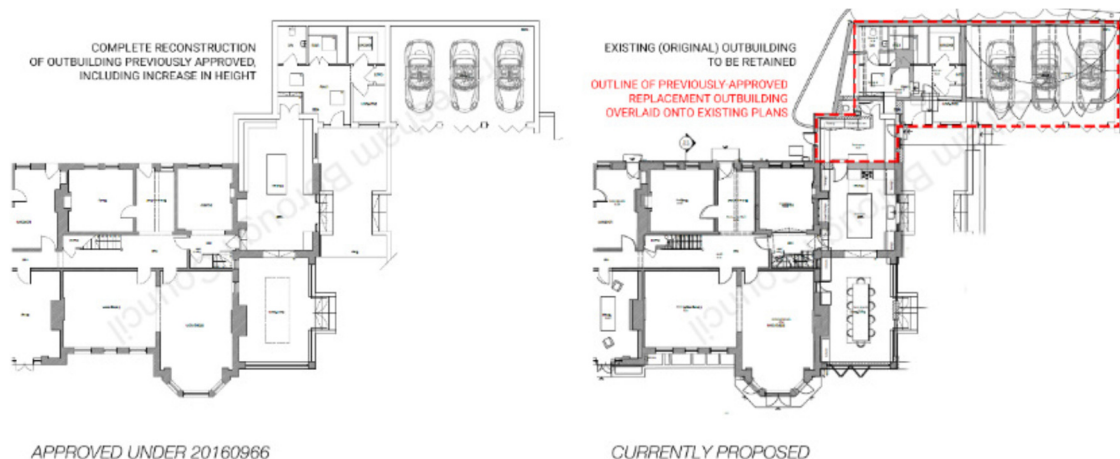
1. Following the submission of householder planning application ref. no: 20231283, the following comments were received from the County Council's Senior Archaeological and Conservation Officer:

The site lies within an area of multi-period archaeological potential with historic map evidence of buildings on this site from at least the later 18th century. The application has been made without any detailed historic assessment of the building, which is not listed, but which should be considered as a non-designated heritage asset. Historic mapping (e.g. the early 19th Tithe map) records the main dwelling and the range next to the road as being joined at that time. I am not certain of the origins of the original buildings at the site and it is possible that the proposed works may impact on historic fabric and below-ground archaeological remains. I therefore recommend that if planning permission is granted the following condition is applied to any forthcoming consent. [archaeological watching brief]

2. Paragraph 209 of the National Planning Policy Framework states that *"in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*
3. It is noted that the Council's heritage officer neither objects to the proposals nor states that they would cause harm to the building. Based on the reasons outlined in the separately-submitted Planning & Design Statement, the proposals are not deemed detrimental to the appearance of the building or the streetscene.
4. Additionally, the property in question was not classified as a locally-listed building or non-designated heritage asset during the assessment of three previous planning permission applications: ref. no: 20230656 (2023), ref. no: 20160966 (2016), and ref. no: 20090320 (2009).
5. Nonetheless, the purpose of this document is to provide an additional assessment regarding heritage concerns, demonstrating that such aspects have been considered by the applicant.
6. The proposals can be categorised into three distinct elements: (i) the replacement of the existing windows, (ii) the erection of a link structure between the main dwellinghouse and the outbuilding at the front of the site, and (iii) the demolition of the existing conservatory and the erection of a two-storey side and rear extension.
7. As detailed in paragraphs 2.20 to 2.25 of the Planning & Design Statement (extract below), the existing windows comprise mismatching glazing bars, detracting from the property's appearance. This discrepancy is particularly noticeable on the front elevation, with a similar mix of different and non-conforming window styles evident on the rear and side elevations. Hence, the proposal seeks to replace all existing windows (most of which are not original – hence the lack of coherent design) with double-glazed, timber sash windows of identical design but otherwise closely matching the predominant style.



8. At worst, it is considered that the proposed window alterations would have no material impact on the appearance of the building; at best, the works are viewed as an improvement over the existing arrangement.
9. The proposed replacement windows will be timber sash painted white. As such, the proposals already benefit from deemed consent under Article 3 of the General Permitted Development Order 2015 pursuant to Class A ('enlargement, improvement or other alteration of a dwellinghouse'), Part 1, Schedule 2 of that Order. The proposed alterations therefore could be undertaken without the need for planning permission.
10. Concerning the proposed link structure, paragraphs 2.6 to 2.19 of the Planning & Design Statement illustrate how the intended works are confined to an existing area of hardstanding, mostly concealed from views. Consequently, the proposed building operations would not adversely affect the character and appearance of the property.
11. Importantly, no concerns regarding heritage, building fabric, or archaeology were raised by officers (nor were any relevant planning conditions imposed) during the determination of planning application ref. no: 20160966, where consent was granted for a similar link structure between the main building and the street-facing outbuilding (which was to be completely demolished and rebuilt). However, one significant difference between the previous application and the current proposals is that, unlike the proposals approved in 2016, there is no intention to demolish and rebuild the existing outbuilding (see illustration below). Therefore, the potential harm to archaeological features or the character and appearance of the application site is minimal compared to the proposals previously approved under ref. no: 20160966, which did not require an archaeological assessment, neither at planning stage or as required by any planning conditions.



12. In view of the conclusions drawn during the determination of planning permission ref. no: 20160966 and the limited area of existing hardstanding to be infilled, further archaeological assessments are not deemed necessary.
13. Lastly, concerning the proposed demolition of the existing (modern) conservatory and the erection of a two-storey side and rear extension, it's important to note that the proposed works will be confined to the footprint of the existing conservatory structure. Therefore, the proposals are not deemed detrimental to potential archaeological features, as the area of works has recently been excavated for foundations and covered with new buildings. Furthermore, no planning conditions pertaining to archaeological surveys were imposed when planning permission for the construction of the existing conservatory structure was granted under ref. no: 20090320.

Note: Although the terminology may suggest a lightweight structure, the existing conservatory is a substantial building extension with foundations and brick footings, which would have necessitated extensive preparatory and excavation works. Consequently, its reconstruction (with an additional storey) will have no further impact on archaeological remains.

14. In comparison to the proposals previously submitted under ref. no: 2023/0656 (for the erection of a single-storey side extension and sunken terrace), the current proposals would require significantly fewer excavation works (the sunken terrace alone would have required the excavation of 45 cubic metres of soil) and would pose no potential impact on adjacent trees.
15. Paragraphs 2.2 to 2.5 of the Planning & Design Statement (including computer-generated mock-ups on pages 10 and 11) emphasise how the proposed extension has been designed to be subordinate to the main dwellinghouse, with minimal impact on surrounding views, thus preserving the character of the building and its surroundings. The design aims to retain the formality and grandeur of the existing building while leaving the principal (i.e. rear-most) rear elevation largely unaltered and exposed, rather than opting for the construction of a near-full-width single-storey rear extension under permitted development.

16. Despite the existing building not being listed by statute, and therefore internal works not requiring planning permission, the applicant has carefully designed the current proposals to minimize any potential impact on the existing building fabric.
17. Firstly, no new openings are proposed between the ground floor of the reconstructed extension and the adjoining sitting room (designated as 0.11 on the existing plans). While it is proposed to enlarge the existing opening between the kitchen and the reconstructed extension, this opening already exists and could currently be widened without requiring planning permission.
18. Regarding the first-floor component of the proposed replacement extension, no new openings are planned for the external wall of the bedroom numbered 1.10. Instead, access to the new floor space will primarily be through the existing window openings connected to the master bedroom numbered 1.01. Thus, the existing plan form is largely preserved.
19. Nevertheless, to acknowledge the existing built form (albeit potentially surpassing statutory requirements), the applicant has agreed to modify the proposed plans. Therefore, on the ground floor, the existing internal kitchen openings will be retained, and on the first floor, the existing wall openings will be utilized.
20. Taking into account all factors, including those outlined above and within the Planning & Design Statement, the proposals are regarded as acceptable on heritage grounds. This assessment holds true even if the property were to be appraised as a locally-listed building (acknowledging that previous assessments did not consider it as such). Additionally, revisions to the initially submitted drawings have been made based on officer recommendations.
21. The imposition of a pre-commencement planning condition for an archaeological watching brief is deemed unnecessary in this case. This determination arises because the proposed building operations are confined to an area recently excavated for the construction of the existing modern conservatory. Moreover, the works proposed between the main dwelling and the existing outbuilding are of modest scale and have previously received planning permission (as part of more extensive works involving the complete demolition and reconstruction of the existing outbuilding). It's noteworthy that these prior proposals, which are no longer being pursued, were granted without the imposition of any pre-commencement conditions related to archaeology.
22. Further matters pertaining to the character and appearance of the building are evaluated in more detail within the Planning & Design Statement.