

Heritage Statement

Replacement of 15no. flat entrance doors and 2no. basement lobby access doors with certified FD30S fire and smoke resisting door-sets

Denne Park House, Worthing Road, Horsham

Prepared by

WPS Planning

Planning Statement
Denne Park House



Prepared by:	Doug Wright
Date:	Dec 2025
Project Number:	187/2025

Contents

1.0 INTRODUCTION	1
2.0 SITE AND SURROUNDING AREA	1
3.0 PLANNING HISTORY OF THE SITE	2
4.0 THE PROPOSAL	3
5.0 PLANNING POLICY	4
6.0 PLANNING ASSESSMENT	6
7.0 CONCLUSION	11

1.0 INTRODUCTION

- 1.1 This Heritage Statement supports an application for Listed Building Consent for the replacement of a defined set of internal/common-part doors within Denne Park House, a Grade II listed building, now in use as flats. The works are required to address identified deficiencies in the existing doors in respect of fire resistance and smoke control, with the intention of improving life safety for residents and visitors while ensuring the special architectural and historic interest of the listed building is preserved.
- 1.2 The attached fire safety inspection identifies that a number of the existing doors “present as not a fire rated door” and/or cannot be confirmed as upgraded to a notional 30-minute standard, alongside deficiencies in seals, closers, hinges, and threshold gaps. The report concludes that the doors should be upgraded using approved methods or replaced with FD30S doors, as appropriate.
- 1.3 This Statement sets out the site context, planning history, details of the proposal, relevant planning policy, and an expanded planning assessment based on the Horsham District Planning Framework (HDPF) and the National Planning Policy Framework (NPPF).

2.0 SITE AND SURROUNDING AREA

- 2.1 Denne Park House is located within the Denne Park area of Horsham, accessed via Worthing Road (A24), within an established residential setting. The building sits within landscaped grounds and is experienced in views alongside a mix of built form typical of Horsham’s suburban edge, including large detached and semi-detached dwellings, residential conversions and later infill development, with areas of mature planting and boundary treatment contributing to the enclosed, leafy character of the locality. The site is well-related to Horsham’s urban area, with access from the surrounding road network, and the listed building remains a prominent historic element within its immediate townscape context, with the later nineteenth-century west front and the earlier north-east tower forming key visual features within the setting.

- 2.2 Historic England listing description confirms that Denne Park House is a multi-phase building of considerable historic and architectural interest. The listing records that the original portion in the north-east corner was built in 1605, with that date on the tower, and describes the building's historic fabric and architectural detailing including a Horsham stone slab roof, square-headed mullioned and transomed windows, gables surmounted by pinnacles, and a four-storeyed tower with a good contemporary staircase to the north.
- 2.3 The listing further notes that around 1870 the house was greatly enlarged to the south and west in a matching style, and that the present main (west) front dates wholly from that period. The entry also confirms that the house is now occupied in flats.
- 2.4 Relevance to this application: The above description indicates that the principal significance of the asset lies in the historic evolution of the house and its external architectural form and detailing across the 1605 core and the 1870 enlargement. The proposal relates to internal/common-part doors associated with the building's current residential use, and therefore does not entail alteration to the defining external features described in the list entry.

3.0 PLANNING HISTORY

- 3.1 Over many years, Horsham District Council has approved a number of applications at Denne Park House, and a clear theme is the ongoing repair and upgrading of the building in a way that keeps it working as flats while remaining sensitive to its listed status.
- 3.2 A large part of the history relates to windows. There have been several approvals for replacing windows, including recent applications in 2024 for replacement single-glazed timber windows with internal secondary glazing, and separate approvals for replacement windows to the first and second floors of an apartment. Similar window replacement consents were also granted in earlier years, showing that like-for-like or carefully designed window upgrades have been accepted before.

- 3.3 Another repeated theme is tree management across the site, particularly involving the many lime trees. The records show ongoing permissions for tree surgery and felling at different times, including more recent works in 2024, 2023 and 2019, and earlier works going back to 2007 and 1993. This reflects routine estate management rather than one-off development change.
- 3.4 The history also shows that the Council has previously supported communal safety and building-services improvements where needed. For example, in 2010 Listed Building Consent was granted for upgrades to communal areas, including emergency lighting, a fire detection/alert system, and electrical improvements. This is relevant because it demonstrates a long-standing acceptance of necessary safety and compliance works within the listed building when handled appropriately.
- 3.5 Importantly, there is precedent for internal door replacement as well. In 2010, Listed Building Consent was granted to replace nine internal doors within an apartment. In addition, other internal alteration consents have been granted over time, indicating that internal works have been supported where they do not undermine the building's significance and are carried out sympathetically.
- 3.6 Overall, the planning history indicates that Horsham District Council has consistently allowed practical repairs and upgrades at Denne Park House—including windows, internal alterations, safety measures and estate management—provided the works are designed and implemented in a way that respects the character and special interest of the Grade II listed building.

4.0 THE PROPOSAL

- 4.1 The proposal seeks Listed Building Consent for the replacement of 15 flat entrance doors and 2 basement access lobby doors within Denne Park House to deliver a certified FD30S fire and smoke resisting door-set solution in accordance with the recommendations of the submitted Fire Door Survey Report and the accompanying door quotation.

Proposed specification (summary)

B1. Type A – Flat entrance door-set (15 no.)

- FD30S door-set, incl. intumescent strips and smoke seals
- 3-panel solid with mouldings to corridor face
- Finishes: RAL 9005 (corridor) / RAL 9010 (flat side) incl. frames
- Hinges: 4 SSS bearing butt hinges
- Closer: Rutland 3204 SE with cover plate
- Ironmongery: lever/lever handle (gold), letterplate (gold), spyhole, numerals
- Locking: Briton Euro profile 5520 sash lock + cylinder/turn (3 keys)
- Installation: fire-resistant caulk + expanding foam; debris removal

B2. Type B – Basement lobby door-set with toplight (2 no.)

- FD30S door-set, solid leaf with toplight
- Finish both sides: RAL 9005 incl. frames
- Closer: Rutland 3204 SE with cover plate
- D handle + push plate; spyhole; no letterplate; unlatched for communal access
- Toplight: clear Pyrostop glazing, framed to match RAL 9005

5.0 PLANNING POLICY

National Planning Policy

- 5.1 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.

5.2 Sustainable development is seen within the NPPF as having three roles, namely an economic, social and environmental role which should be a golden thread running through both plan making and decision taking.

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

- Section 2 – Achieving sustainable development
- Section 12 – Achieving well-designed places
- Section 16 - Conserving and enhancing the historic environment

Local Plan

5.4 In terms of the local planning policy context for the Application Site, the adopted Development Plan for the Horsham District is composed of the following relevant documents:

- Horsham District Planning Framework (HDPF) – Adopted November 2015.
 - Policy 1 - Sustainable Development
 - Policy 32 – The Quality of New Development
 - Policy 33 – Development Principles
 - Policy 34 - Heritage Assets and Managing Change within the Historic Environment
- Horsham District Local Plan (2023-40) (Regulation 19)
 - Policy 1 - Sustainable Development
 - Policy 19 - Development Quality
 - Policy 20 – Development Principles
 - Policy 21 - Heritage Assets and Managing Change within the Historic Environment

6.0 PLANNING ASSESSMENT

Policy framework

- 6.1 The determination of Listed Building Consent must have special regard to the desirability of preserving the listed building, its setting and any features of special architectural or historic interest (Planning (Listed Buildings and Conservation Areas) Act 1990, s.66). This statutory duty is reflected in national and local planning policy.
- 6.2 At national level, the NPPF (December 2024) requires that when considering the impact of a proposal on the significance of a designated heritage asset, great weight is given to the asset's conservation (NPPF para 212).
- 6.3 It also confirms that any harm to (or loss of) significance should require clear and convincing justification (para 213) and sets out the balancing tests for substantial harm (para 214) and less than substantial harm (para 215).
- 6.4 At local level, the Horsham District Planning Framework (HDPF) 2015 – Policy 34 (Cultural and Heritage Assets) requires applications affecting heritage assets to be significance-led, reflect best practice, reinforce special character through appropriate design and use of traditional materials/techniques, preserve vernacular fabric and legibility, secure the viable/sustainable future of assets through appropriate uses, and retain/improve the setting of heritage assets, amongst other criteria.

Significance of the listed building

- 6.5 Denne Park House is a Grade II listed building. The Historic England list description identifies an early component: “the original portion in the north-east corner was built in 1605 and has this date on the tower,” and records later historic development: “about 1870 the house was greatly enlarged to the south and west in matching style, and the present main or west front dates wholly from that time.” The list entry also confirms that the house is now occupied in flats.

- 6.6 The primary significance therefore lies in the building's historic evolution and architectural interest as expressed in its overall form and the defining features described in the list entry.
- 6.7 Internally, some fixtures and joinery can contribute to significance where they help reveal historic character or survival of earlier phases, but in a building converted to flats, internal door leaves and ironmongery are commonly altered over time. In this context, the key heritage sensitivity of the current proposal relates to whether the replacement doors would be visually incongruous or would lead to unnecessary loss of historic fabric in common parts.

The proposal

- 6.8 The proposal is for the replacement of 15 flat entrance doors and 2 doors providing access to the basement lobbies with certified FD30S fire and smoke resisting door-sets, together with associated ironmongery, seals, and making-good/fire-stopping as required to achieve compliant performance.
- 6.9 The submitted Fire Door Survey Report (13/05/2024) repeatedly records that the existing flat entrance doors “present as not a fire rated door” and that, unless supporting information can be provided, the doors require “improvement using approved methods... to make a notional 30-minute door or replacement with an FD30's,” with recommendations also addressing missing seals, need for closers, and hinge upgrades. The report also identifies doors warped to the top leading edge, recommending replacement with new FD30s doors. For the basement lobby access, the report notes that transom glazing has no identifying etchings to confirm its rating and appears to be standard glazing, and again advises upgrade or replacement to achieve a nominal 30-minute standard/FD30s.
- 6.10 The report confirms the inspection was non-intrusive and did not remove architraves or mouldings, meaning the proposal should be understood as an evidence-led response to observed deficiencies rather than intrusive alteration of historic fabric.

6.11 The submitted quotation sets out a specification intended to combine compliance with a traditional appearance. For the 15 flat doors, the quote specifies an “FD30s internal set” with intumescent strips and smoke seals, a “3 panel solid” door with mouldings on the external face, defined colour finishes, compliant hinges, a Rutland closer, spyhole, letterplate, sash lock/cylinder and associated certification/paperwork. For the 2 basement lobby doors, the quote specifies a full solid door with toplight, “UNLATCHED” communal access arrangement, and a Pyrostop clear glazed toplight, again with FD30s certification and fire-resistant caulk/expanding foam finishing.

Impact upon the listed building

6.12 The works are internal and limited to door replacements within a building already in use as flats. They do not entail changes to the external elevations, roof form, tower, gables, windows, or other defining elements of the listed building’s architectural interest as described in the statutory list entry.

6.13 As such, there is no impact on the principal components of significance that underpin the building’s designation.

6.14 The relevant impact pathway is therefore confined to common parts: the potential for (i) loss of any historic joinery associated with door openings and (ii) incremental change to character/appearance of corridors and lobbies. In heritage terms, that risk is principally visual. It is reduced where replacement doors replicate traditional proportions and detailing and where surrounding historic fabric (linings/architraves) is retained and protected.

6.15 On the evidence submitted, the replacement doors are specified as panelled/moulded (for flat entrances) rather than modern flush leaves, and the basement lobby doors incorporate fire-rated glazing in the toplight to address the identified absence of glazing markings/certification in the existing situation. The required performance elements (seals and closers) are typical of compliant FD30S door-sets and are generally discreet in heritage terms, particularly where seals are rebated and closers are selected/positioned to minimise visual clutter.

Why the proposal does not impact (harm) the listed building

- 6.16 In applying HDPF Policy 34, the starting point is to understand what makes Denne Park House special and to ensure the proposal sustains that significance through positive management of change.
- 6.17 Here, the works are targeted at internal doors serving flats and basement lobbies, within a building whose principal significance is expressed through its historic evolution (1605 core and c.1870 enlargement) and its architectural composition.
- 6.18 The proposal does not alter those defining elements and is therefore inherently low risk in heritage terms.
- 6.19 The scheme also reflects the NPPF's requirement to give great weight to conservation (para 212) by being tightly scoped and by selecting a solution that avoids unnecessary conflict with the listed building's character.
- 6.20 The proposed doors are not generic commercial fire doors; instead, the specification adopts a panelled door style with mouldings and a controlled palette, which helps maintain a traditional appearance within the common parts. This directly aligns with Policy 34's expectation that development reinforces special character through appropriate design and, where relevant, traditional materials and techniques, and preserves legibility of fabric and form.
- 6.21 Importantly, the justification for the works is clear and evidenced. The Fire Door Survey identifies that doors generally cannot be confirmed as fire-rated, recommends upgrading to a nominal 30-minute standard or replacement with FD30s doors, and records specific defects such as missing seals/closers, hinge issues and warped leaves. The survey also identifies that the basement lobby transom glazing appears to be standard glazing with no confirming etchings, supporting the need for a certified approach (as now proposed).

- 6.22 In NPPF terms, this provides the “clear and convincing justification” for the intervention (para 213), and it demonstrates a strong public benefit in improving life safety in a multi-occupied residential building.
- 6.23 Taking the above together, the correct heritage conclusion is that the proposals preserve the listed building. Even if the decision-maker were to characterise the works as giving rise to the very lowest level of “less than substantial harm” (through change to internal fabric), that would be extremely limited and would be clearly outweighed by the public benefits of a compliant, certified FD30S fire and smoke-resisting strategy across the building’s means of escape and compartmentation, in accordance with NPPF paragraph 215.
- 6.24 In practice, because the replacement design is sympathetic and the works are internal and targeted, the proposal is properly understood as preserving significance and securing the building’s safe continued use, consistent with the thrust of HDPF Policy 34.

7.0 CONCLUSION

- 7.1 Denne Park House is a Grade II listed building of special architectural and historic interest, with its significance expressed through its early seventeenth-century origins and later nineteenth-century enlargement in a matching style, now functioning as flats.
- 7.2 The submitted Fire Door Survey demonstrates a clear and evidenced need to address deficiencies in existing doors serving protected routes and common parts, including the absence of seals and closers, uncertainty as to fire performance, and instances of door warping. The report explicitly advises upgrading to a nominal 30-minute standard or replacement with FD30S doors where performance cannot be evidenced, recognising that the doors may be within a heritage context but confirming that life-safety compliance is still required.
- 7.3 The proposed solution is carefully targeted: it affects only 17 doors in total (15 flat entrance doors and 2 basement lobby doors) and does not involve alteration to the listed building's external form or key listed features described in the statutory list entry.
- 7.4 Importantly, the replacement door specification is not a "standard commercial" approach; it adopts a traditional panelled timber appearance for the flat entrance doors, and a controlled, certified door-set solution for the basement lobbies including fire-rated toplight glazing where required. The quoted specification also includes the necessary fire safety components (intumescent/smoke seals, tested closers, compliant hinges, fire-resistant making-good and certification).
- 7.5 With appropriate detailing control (samples, confirmation of moulding profiles, careful retention of historic frames/architraves where possible, and neat installation of seals and closers), the works would preserve the character of internal common parts and avoid harm to the building's significance. Any minor change that inevitably arises from modern fire performance requirements would be low-level and confined, and would be decisively outweighed by the public

and resident benefit of improved fire and smoke compartmentation, reduced risk to life, and the responsible long-term management of the listed building in active residential use.

- 7.6 For these reasons, the proposal represents a proportionate and heritage-led response to an identified safety requirement, and it is concluded that Listed Building Consent should be granted, subject to conditions controlling final joinery details, finishes and ironmongery (and/or a final “Door Set Schedule” and sample approval) to secure a high-quality outcome.