

Mr. Chris Banks  
C/O Banks Solutions  
64 Lavinia Way  
East Preston  
West Sussex  
BN16 1EF

Our Ref  
Your Ref  
Date

28 September 2021

Dear Mr Banks,

**WORTHING LOCAL PLAN EXAMINATION**

**RESPONSE ON BEHALF OF HARGREAVES TO THE INSPECTOR'S QUESTIONS**

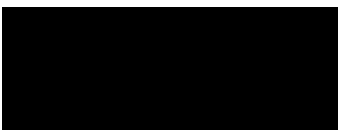
Thank you for your email of 20 September enclosing several documents relating to the Examination of the Worthing Local Plan.

On behalf of my client, Hargreaves, I can confirm that it is not my intention to attend or participate in the Hearing Sessions, physically or virtually. The representations previously submitted remain before the Inspector however and these should continue to be taken into account.

In relation to the Inspectors questions relating to site A1 at Beeches Avenue, contained in document IL05, my responses are set out in the attached document. This presents answers to questions 92, 93 and 94 and includes 2 accompanying drawings referred to in the answers.

If there is any further clarification that the Inspector would find useful in this regard, please let me know.

Yours sincerely,



**Rob Huntley**

## Worthing Local Plan 2020 – 2026 Examination

### Inspector's Initial Matters, Issues and Questions – Version 1 (20 September 2021)

#### Site A1 – Beeches Avenue - Response on behalf of Hargreaves

Q No	Inspector's Question	Response on Behalf of Hargreaves
Q92	<p>Criterion a). requires a safe and suitable access from Lyons Farm that does not compromise or negatively impact on the operations of the football club. What evidence is there that this is achievable?</p>	<p><b>Drawing reference 14047-06B</b> attached illustrates the layout and design of an access road from Lyons Way to the east, capable of serving residential development at the Beeches Avenue site. The location and alignment of the access road would avoid any effect on the operation of the football club. The road would not impinge upon the playing pitch, the clubhouse building or spectator facilities at the site. Adequate parking provision would be retained, although minor reconfiguration of the layout of spaces may be required. The road would accord with the Highway Authority's relevant design standards so as to be suitable for adoption.</p> <p><b>Drawing reference 1978-SK-010</b> attached illustrates a preliminary layout of residential development of the Beeches Avenue site, with access taken from Lyons Way. More detailed design development is envisaged, including pre-application consultation with the Planning Authority, but the drawing shows the practical achievability of development as envisaged in the plan.</p> <p>The club's occupation of the football ground land is on the basis of a short-term terminable lease. This enables modifications, such would be involved in creating an access road across it, to be undertaken at the instigation of the landowner.</p> <p>The 2 drawings referred to above, together with the terms of the club's occupation, make clear that development at the Beeches Avenue site in accordance with criterion a) referred to can be physically, practically and legally achieved as envisaged in the plan.</p>

Q No	Inspector's Question	Response on Behalf of Hargreaves
Q93	<p>The supporting text refers to the car repairer needing to be relocated. However, criterion g). only requires consideration to be given to the suitable relocation of the business. Is the relocation of the car repairer necessary to deliver the site? What evidence is there that this is achievable? In addition, is it clear to a decision maker how they should react to a planning application in this regard?</p>	<p>The small-scale buildings close to the southern boundary of the Beeches Avenue site are occupied by the car repairer on a short-term commercial lease. This excludes any long-term security of tenure under the Landlord and Tenant Act 1954.</p> <p>The relatively poor-quality nature of the buildings is such that they are in any event nearing the end of their useful life. It is therefore likely that the car repair operation would need to vacate the premises in the near future, irrespective of any proposal for residential development at the site.</p> <p>Although residential development of the whole of the Beeches Avenue land would involve the car repair operation vacating the site, relocation to different premises would not be an essential requirement. Relocation, as opposed to closure of the business, would be a commercial decision for the car repair operator. A significant supply of potentially suitable premises exists in the locality to which the car repair operator could move on commercial terms if it so chose.</p> <p>Relocation of the car repair operation is therefore achievable, but as this would be a commercial matter for the operator, it is not appropriate for the plan to imply that relocation (as opposed to vacation of the premises) is a planning requirement.</p>
Q94	<p>What is the justification for suggested modification M10 and is it necessary for soundness?</p>	<p>Suggested modification M10 involves a relatively minor change of wording, promoted at the suggestion of the Environment Agency. Hargreaves, as promoter of the Beeches Avenue site, does not object to the suggested modification, although this would not be necessary in terms of the soundness of the plan.</p>







FEASIBILITY  
SUBJECT TO DESIGN DEVELOPMENT



0 15m 30m 45m  
1:500 scale

Rev Description Issued By Issue Date

SCHEDULE

Phase I

HOUSE UNITS

2B - 21  
4B - 34  
TOTAL = 69 UNITS

FLATS

1B - 8  
2B - 6  
TOTAL = 14 UNITS

TOTAL UNITS - 83

PARKING SPACES - 178 (2:14 ratio)

MORGAN CARN  
ARCHITECTS

#Client Company

LAND OFF LYONS WAY, WORTHING

PHASE I SITE LAYOUT - ROOF  
PLAN

1:500 @ A1  
PROJECT: SK001  
1978-SK-010