

Steven Lee,  
C/O Chris Banks,  
64 Lavinia Way  
East Preston  
West Sussex  
BN16 1EF

19 October 2021  
Ref:SS/Let/P1702ii

Dear Sir,

**RE: Worthing Local Plan 2020 – 2026 Examination Matter 5 – Site Allocations.**

This Hearing Statement has been produced by ECE Planning on behalf of **St William Homes LLP** in response to the Inspector's *Initial Matters, Issues and Questions to the Council – Version 1 (20 September 2021)*.

St William, a joint venture between National Grid and the Berkeley Group, is the site owner and developer for the Former Gasworks Site on Lyndhurst Road, Worthing (Allocation A9 within the Draft Local Plan).

Representations have been made to Worthing Borough Council on their consultation on the Submission Draft Local Plan 2020 – 2036 (referred to hereon in as the 'Draft Local Plan'). Since this time, St William Homes has submitted a planning application for the following development at Land at the former Gasworks Site Park Road Worthing West Sussex under planning reference AWD/1459/21:

*Full Planning Application for the demolition of existing structures, partial removal of boundary walls and the construction of 209 residential apartments spread across 5 blocks ranging in height from 3-7 storeys, associated access, parking, open space and landscaping*

The Planning Application was validated on 02/08/2021 with the statutory consultation period ending 04 Oct 2021.

The planning application referred to above includes far greater detail on planning related matters than the Local Plan evidence base. This relates to a specific form and quantum of development proposed on the site and is currently being scrutinised through the development management process. Nonetheless, the application process is drawing out detailed consideration of planning matters pertinent to the allocation A9 policy and specifically to the questions raised by the Inspector.

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Whilst the Local Plan Examination is not the arena for the detailed consideration of a undetermined planning application, there are certain aspects of the application that we wish to bring to the Inspectors attention to provide comfort that planning matters have been adequately considered in detail for the site (including for instance in relation to matters relating to heritage, highways, contamination, and ecology).

This Hearing Statement seeks to address the site specific questions raised under Matter 5 – Site Allocations with specific regards to Allocation A9 – Lyndhurst Road and addresses questions 116 – 118.

### **Q116. Has full consideration been given to the suitability and delivery of the site, with particular regard to contamination, heritage and biodiversity impacts?**

#### **Contamination**

The National Planning Policy Framework (NPPF) is clear that substantial weight should be attributed to using suitable brownfield land within settlements for homes supporting appropriate opportunities to remediate contaminated land (paragraph 120 and 174). As such, the proposed allocation of the site is considered entirely aligned with national policy.

Whilst we are not aware of any site specific contaminated land assessment prepared by the Council for allocation A9, a Preliminary Risk Assessment for the Gasworks site was submitted to the Council under planning application reference AWDM/1459/21 (Appendix A).

The PRA is a report that aims to analyse all potential sources of contamination and determine the contamination risk at a site, in addition to providing a scope for further investigations, if necessary. The PRA is the first step involved in the assessment and management of risks from contaminated land. The PRA notes:

*The site has been identified for inspection under the Council's contaminated land strategy. The site is considered to be of medium priority for further investigation. It is considered suitable for its current use, but appropriate planning conditions will be applied to future developments.*

Discussions with both the Council and the Environment Agency have taken place since the submission of the application and detailed site investigations have been undertaken to inform the remediation strategy for the site.

The applicants recently presented findings of the site investigations and current considerations with regards to remediation to Worthing Borough Council Environmental Health and Planning Officers. We can confirm that the applicants agreed to submit a report setting out the site investigations undertaken to date, an outline of the findings, and intentions for remediation to be considered as part of the application.

An approach to remediation for the site has also been informally agreed with the Environment Agency (with regards to impact on ground water).

At the time of writing, the site investigation report and details that are intended to be submitted to the Council under planning application reference AWDM/1459/21 have not yet been submitted. It is anticipated that at the time of the Examination in Public that this information would be publicly accessible and a verbal update can be provided to the Inspector at the time of the Examination Hearing.

However, we are confident that the details submitted will provide sufficient comfort to the Local Planning Authority that matters relating to contaminated land can be adequately dealt with (and appropriately worded conditions attached to a planning permission could

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secure an appropriate approach to dealing with this matter before and during the construction phase).

In our view this would deal with the Inspectors comments in relation to 'suitability'. With regards to delivery, the applicants for the site, St William Homes LLP are specialists in developing on former gasworks sites. The application is due to be heard at the Worthing Borough Council Planning committee within the coming months and assuming a positive outcome, St William Homes will be working to a programmed delivery a start date of summer 2022 (on site).

St William Homes has completed development on two gasworks sites in the UK and is currently on-site on a further eight sites. With extensive experience in bringing forward development on contaminated sites, St William Homes has

### Heritage

A Heritage Statement was submitted to the Council under planning application reference AWDM/1459/21 (Appendix B).

In terms of heritage impact, the site will not physically impact on any listed building and the site is not located within a Conservation Area. There are however a number of Listed Buildings and Conservation Areas located within the vicinity of the site.

The Heritage Statement that accompanies the planning application considers in detail the impact of the scheme proposals and concludes that there would be no harm to the significance of nearby heritage assets with the exception of the Warwick Gardens Conservation Area to the south where in a limited number of views the top floors of one taller element proposed as part of the development would be perceptible. In this respect, the Heritage Statement concluded that less than substantial harm would occur as a result of the proposal (which would need to be weighed up against the benefit of housing delivery on a highly sustainable town centre brownfield site).

In addition to this, five design related pre application meetings were held with the Council to discuss (amongst other matters) the impact of the scheme upon surrounding heritage assets. The Design and Conservation Officer was present at meetings and alongside the Case Officer proposed amendments to the scheme to ensure impacts were acceptable in relation to heritage assets, particularly surrounding Conservation Areas. The Planning Statement that was submitted with the application sets out details of the pre application discussions (Appendix C).

Two Design Review Panel meetings were also held with Design South East. The Panel is made up of design experts including Historic Environment professionals. The final DRP meeting concluded (refer to Appendix C for more details):

*On the basis of assessments shown to us, the visual impact both from the adjacent streets and from more distant points is acceptable. The scheme will not be unduly obtrusive, including from the Warwick Gardens Conservation Area a short distance to the south.*

In all other matters in relation to heritage impact, the scheme is considered suitable. Indeed, it is considered to be more suitable than other allocations which are more impactful in this respect (such as Union Place for instance). Heritage considerations pose no constraint to delivery of housing on the site.

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We would urge the Inspector to consider the application Heritage Statement since it demonstrates that a development of 209 dwellings will have minimal impacts in heritage terms.

### Biodiversity

Planning application reference AWDM/1459/21 is supported by an Ecological Impact Assessment (EclA) (Appendix D) including and assessment of the Biodiversity Net Gain of the proposed development. The EclA notes:

*The existing habitats found throughout the site are of broad low ecological value and offer limited potential to support protected or notable species...*

The EclA also notes that no further phase 2 survey work is required.

In terms of Biodiversity Net Gain, the site offers significant opportunities for improvements given the very low ecological base of the ecologically degraded site. The planning application proposal for instance, will result in a significant betterment to the ecological value of the site by virtue of the opportunity posed by the proposed landscaping scheme, brown roof provision and other ecological enhancements (such as bird and bat boxes). The EclA states the scheme will lead to:

*...a Biodiversity Net Gain of **726% in Habitat units and 210% in Hedgerow Units** and provide new nesting habitat for birds and roosting bats, as well as significant brown roof elements, which will compensate for the loss of small areas of low ecological value, and result in significant enhancements.*

There is therefore the potential for any development of this site to significantly enhance the local environment. As such the redevelopment of this site represents in our view one of the most suitable opportunities for any allocation in terms of biodiversity improvements given the degraded nature of the existing environment. The suitability of the site is acceptable in this respect and delivery of development would not be impacted by biodiversity.

### Q117. Has full consideration been given to the impact of development on the highway network and parking provision?

Planning application AWDM/1459/21 was supported by a detailed Transport Assessment and Travel Plan. The Transport Assessment (Appendix E) which accompanied the application identifies the site as highly sustainable in location terms being well located within the Town Centre with excellent access to sustainable transport modes.

The Highways Officer at West Sussex County Council has reviewed this submission and has stated that the... *site is located in close proximity to the town centre and its range of bus and rail services* (the full response is shown in Appendix F).

With regards to parking, the sustainable location of the site was acknowledged again and WSCC agreed with the proposed level of parking as follows:

*The application proposes 110 parking spaces to serve the 209 apartments at a ratio of 0.53 space per unit. The ratio is considered acceptable given the sustainable location of the application site and parking ratios provided at near by sites including Teville Gate and Union Place.*

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The current proposal demonstrates that for a scheme of 209 dwellings, an acceptable parking ratio can be achieved for this highly sustainable town centre site alongside other mitigation measures (such as car clubs and other sustainable travel initiatives).

With regards to trip generation, the Transport Assessment submitted with the application has been reviewed by the WSCC Highways Officers who commented as follows:

*Traffic surveys were undertaken at the site access in October 2020 to establish the baseline trip generation of the site. The surveys recorded 70 two way AM peak movements and 42 two way PM peak movements.*

*A TRICS assessment utilising the same parameters as Union Place has been undertaken which predicts the site would generate 56 AM peak and 50 PM peak two way vehicular trips.*

*This would result in a net reduction of 14 AM peak two way trips and an increase of 8 PM peak two way trips and as such the development would not require wider modelling or result in a severe impact on the local highway network.*

In terms of junction modelling, the officer notes:

*A Picady model has provided for the site access on Park Road, pre covid counts and 2021 flows have been compared for a permanent counter site on Lyndhurst Road to provide a suitable factoring up ratio to account for reduced flows during the time of the survey. TEMPRO growth factors have also been applied. The modelling shows the site access would [be] well within capacity.*

The findings of the applicants Transport Assessment have been ratified by Highways Officers at West Sussex County Council. In our view therefore, the highway impacts of development of the site have been fully considered in detail for a scheme of 209 dwellings and has been found to be acceptable. This should provide sufficient comfort that highways matters for the site have been adequately considered for the purposes of the Local Plan examination.

### **Q118. What is the justification for suggested modification M18 and is it necessary for soundness?**

In our view this modification is not required. It repeats policy requirements set out within Local Plan policy DM24 The Historic Environment and policy set out within the Framework Section16 (Conserving and enhancing the historic environment).

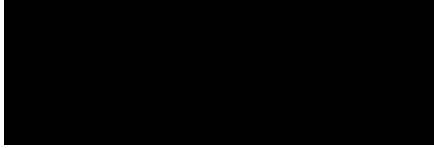
## **Conclusion**

This statement provides further detail relating to the redevelopment proposals for the site as submitted in planning application reference AWDM/1459/21. The site is, in our view, entirely suitable representing one of the most sustainable allocations within the Local Plan delivering much needed housing for the Borough.

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If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely  
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Sam Sykes MRTPI  
**Associate Director**