ECE Planning

# Planning Statement

## Land At Former Gasworks Site, Park Road, Worthing, West Sussex.

July 2021

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|---|---|
| Project Name: | Worthing Gasworks |
| Location | Land At Former Gasworks Site, Park Road, Worthing, West Sussex. |
| Client: | St William Homes LLP |
| File Reference: | P1702i |

| Issue | Date | Author | Checked | Notes |
|---|---|---|---|---|
| PL.1 | 11/05/2021 | R Maslen | S Sykes | Initial Draft |
| PL.2 | 01/07/2021 | S Sykes | C Barker | Second Draft |
| PL.3 | 02/07/2021 | S Sykes | C Barker | Client Draft |
| PL.4 | 23/07/2021 | S Sykes | C Barker | Planning Draft |
| PL.5 | 26/07/2021 | S Sykes | C Barker | Planning Issue |
| PL.6 | 28/07/2021 | S Sykes | C Barker | Revised Planning Issue |

# Contents

# Figures

# 1. Introduction

1.1. This Planning Statement has been produced on behalf of **St William Homes LLP** in support of their full planning application for the redevelopment of Land at the Former Gasworks Site, Park Road, Worthing, West Sussex. The development description for the proposal reads:

> *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*

1.2. The proposal seeks to redevelop a disused gasworks site to provide for much needed housing within a highly sustainable, town centre location. The development will make the best possible use of a brownfield site, which is allocated for residential development within the Worthing Core Strategy 2011 and the Submission Draft Worthing Local Plan 2021.

1.3. This Statement will examine relevant planning policy and guidance considering the effects of the proposed development on the site and the surrounding area.

1.4. The views expressed in this Statement and the contents of the application have been informed by extensive pre-application discussions with Worthing Borough Council and West Sussex County Council. The proposals have also been taken to two Design Review Panels (Design South-East), a presentation to the Major Project Board, and has also been the subject of three rounds of public consultation. (Please see Statement of Community Involvement for full details)

1.5. The development has been assessed against the criteria and thresholds contained within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The site as a whole comprises an area of approximately 1.1ha. Having regard to the nature of the proposed development together with the environmental constraints within the vicinity of the site, and proposed mitigation measures, a 'Screening Request' was submitted to the Council on 23 October 2020. The Council provided a 'Screening Opinion' on 18th December 2020, which determined that the development would not be Environmental Impact Assessment development (Appendix A).

1.6. This Application is supported by the following documents and drawings:

- **Application and CIL forms**
- **Planning Notices**
- **Planning Statement**
- **Statement of Community Involvement**
- **Design and Access Statement**
- **Floor Plans and Elevations**
- **Viability Report**
- **Heritage Statement**
- **Archaeological Assessment**
- **Verified Views**
- **Townscape Visual Impact Assessment**
- **Tall Buildings Statement (within Design and Access Statement)**
- **Landscape Masterplan and Strategy**
- **Biodiversity and Ecology Surveys and Report**
- **Air Quality Assessment**
- **Noise Assessment**

- **Energy Statement**
- **Daylight, Sunlight and Overshadowing Assessment**
- **Flood Risk Assessment**
- **Transport Assessment and Travel Plan**
- **Road Safety Audit (refer to the Transport Assessment)**
- **Wind Report**
- **Overheating Assessment**

# 2. The Site

2.1. The proposed development site is 1.1 hectares in size and located within the Built-up Area Boundary (and Town Centre boundary) of Worthing, on the corner of Park Road and Lyndhurst Road. The site is within a highly sustainable town centre location and is allocated as an Area of Change (Area 7) for mixed use development in the Worthing Core Strategy (2011). This allocation has been carried over into the Submission Draft Worthing Local Plan (2021) with the site being allocated solely for residential development (up to 150 units) under draft site allocation **A9 – Lyndhurst Road**.

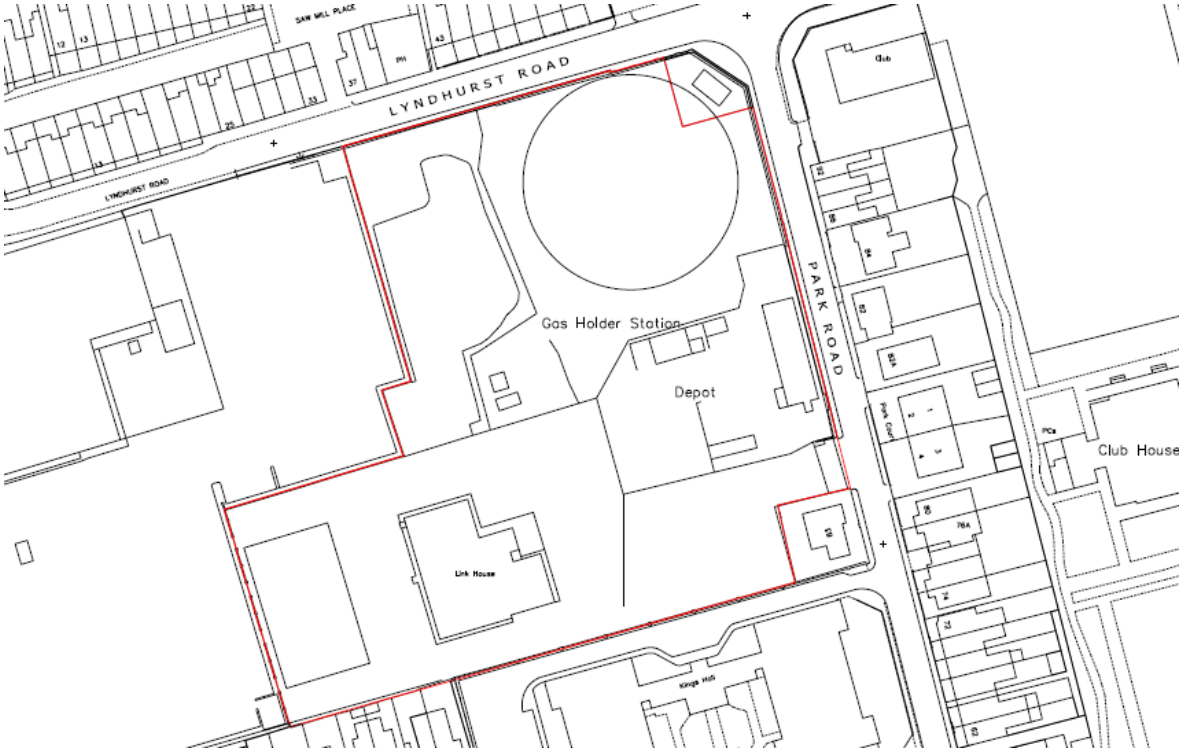


**Figure 1: The Site**

2.2. Worthing Gasworks is a brownfield site that previously contained three gasholders and their associated equipment and buildings. Part of the site is currently leased on a temporary basis to the NHS for hospital staff car parking.

2.3. Permanent structures remain on the site including a large warehouse with shallow pitched roof to the south western corner and a large single storey structure with flat roof to the east of this known as Link House. Both of these properties were leased to a local charity until recently (Partnership for Growth). A smaller single storey structure to the north of the existing access point on Park Road was used as a depot and store by Southern Gas Networks (SGN). The leases for the properties have recently expired and these properties are now vacant. Several containers are located within the site on the eastern side with car parking in the south / central part of the site.

2.4. The north east corner element of the site sits outside of the planning boundary as demonstrated within Figure 1. The only remaining element of the gas infrastructure is located here in the form of a gas governor. The gas governor is housed within a green rectangular structure which is also relatively new (and which can be seen in Figure 5).

2.5. In terms of boundary treatment, the site is bounded by a brick wall along the Park Road frontage with a poor-quality chain-link fence and barbed wire to the upper part of the wall. This wall increases in height towards the northern part of the boundary on Park Road and retains the same height along Lyndhurst Road and the corner junction where the two roads meet. On the Lyndhurst Road junction particularly, the tall wall creates an oppressive environment particularly for pedestrians where the footpath that runs adjacent to it is of a substandard width.

2.6. The boundary treatment on the southern part of the site is a brick wall of varying quality. To the western side of the site there is a mix of brick wall on the southern part of the boundary with the Waitrose Car Park with palisade fencing to the northern part of the western boundary (where the Waitrose Car Park extends to the east).

### Surrounding Context

2.7. With regard to the surrounding environment, immediately to the north is Lyndhurst Road which is primarily residential in nature and comprised mostly of early 19th Century two storey terraced housing. There is also a new development of two and a half storeys at Saw Mill Place and a three storey block of apartments (Birch Tree Court) beyond this. On the western side of this frontage is the Selden Arms Public House. A funeral director is also located on the corner of Park Road and Lyndhurst Road. Worthing Hospital, its associated buildings and car parking lie to the north-east of the site.

2.8. Directly to the east of the site is Park Road which is also residential in nature and comprised of a mixture of traditional and contemporary dwellings ranging from two storey terraced and semi-detached properties to flatted development of three storeys. Park Road is within an area of special environmental character under saved Policy BE25 of the Worthing Local Plan (2003). Beyond Park Road is Beach House Park (an ornamental gardens and bowling green).

2.9. A mix of 19th Century properties and contemporary flatted residential development backs onto the site on its southern boundary. Kings Hall, at three storeys with pitched roof, is located to the south of the site. A two storey detached property is located outside of the red edge boundary on the south east corner of the site (83 Park Road).

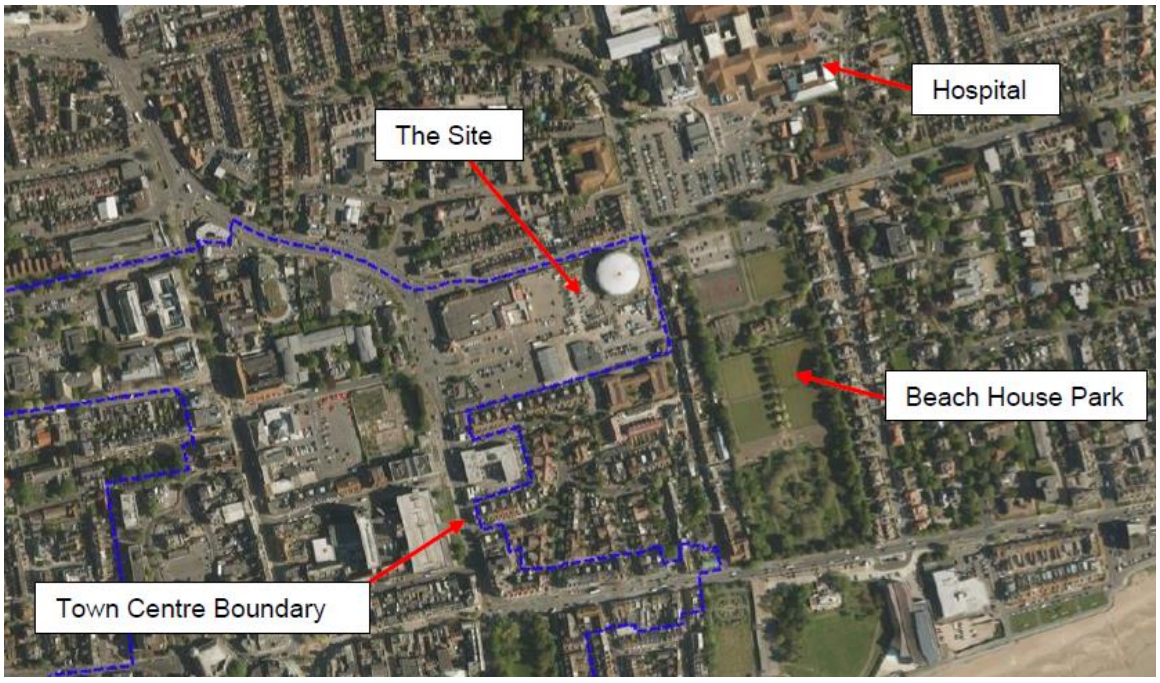


**Figure 2: Site Context**

2.10. Immediately to the west of the site is Waitrose supermarket and a large surface level car park. Beyond this is the Union Place development site (which benefits from a resolution to grant permission subject to an agreed S106 (refer to Section 3 for further details)) with the shops and services associated with Worthing Town Centre beyond.

### Accessibility

2.11. The site is located within a highly sustainable town centre location. Worthing Train Station is approximately 1km to the north west of the site and can be reached in approximately 11 minutes on foot or 5 minutes by bicycle. Worthing train station allows for easy connection to Southampton, Portsmouth, Chichester, Littlehampton, Brighton, and London Victoria and allows for connection to the wider rail network and further onward travel.

2.12. The nearest bus stops on Lyndhurst Road (Worthing Hospital) are approximately 120m away serving routes 9, 16 and 106 and 'Pulse' service. These buses provide services to Shoreham, Arundel, Lancing, Angmering, Durrington and Sompting and connect to onwards travel such as to Brighton.

2.13. In addition, there are bus stops approximately 270m to the east of the site, along Chapel Road, which provide additional services. The bus stops along Chapel Road serve routes 1, 5, 7, 10,16 and 21 towards Worthing, Broadwater, Salvington, Midhurst, Durrington, Crawley, Tarring, Lancing and Petworth.

2.14. The site is near both primary and secondary shopping areas within the town centre shopping area located approximately 700m to the southwest (10 minutes walking / 5 minutes cycling). The site has easy access to shops, services, leisure, and employment opportunities within half a mile of the development site.

2.15. These include (but are not limited to) supermarkets (Waitrose, Lidl, Tesco Express, Iceland and multiple convenience stores), Guildborne Shopping Centre and high street shops, restaurants and cafes, the Post Office, multiple banks, Splash Point Leisure Centre, multiple primary schools and nurseries, Worthing Hospital and doctors surgeries, and multiple opportunities to enjoy public open space (Beach House Park, Beach House Grounds, Denton Gardens, Steyne Gardens and Worthing Sea Front). The site is extremely well located in sustainability terms.

### Heritage Assets

2.16. There are no designated heritage assets on the site however there are a number of nearby listed buildings and Conservation Areas.

2.17. In terms of listed buildings, Figure 3 below shows the nearest listed buildings being approximately 100m to the south west of the site (40-44 High Street – Grade II) and 135m to the south of the site (properties along Warwick Place – Grade II). The site is within an area of potential archaeological significance.

2.18. Warwick Gardens Conservation Area is located immediately to the south of the site with Little High Street and Francombe Road Conservation Areas located further north and west of the site (Figure 4). Steyne Gardens Conservation Area is located to the south of the Warwick Gardens Conservation Area.


Figure 3: Listed Buildings

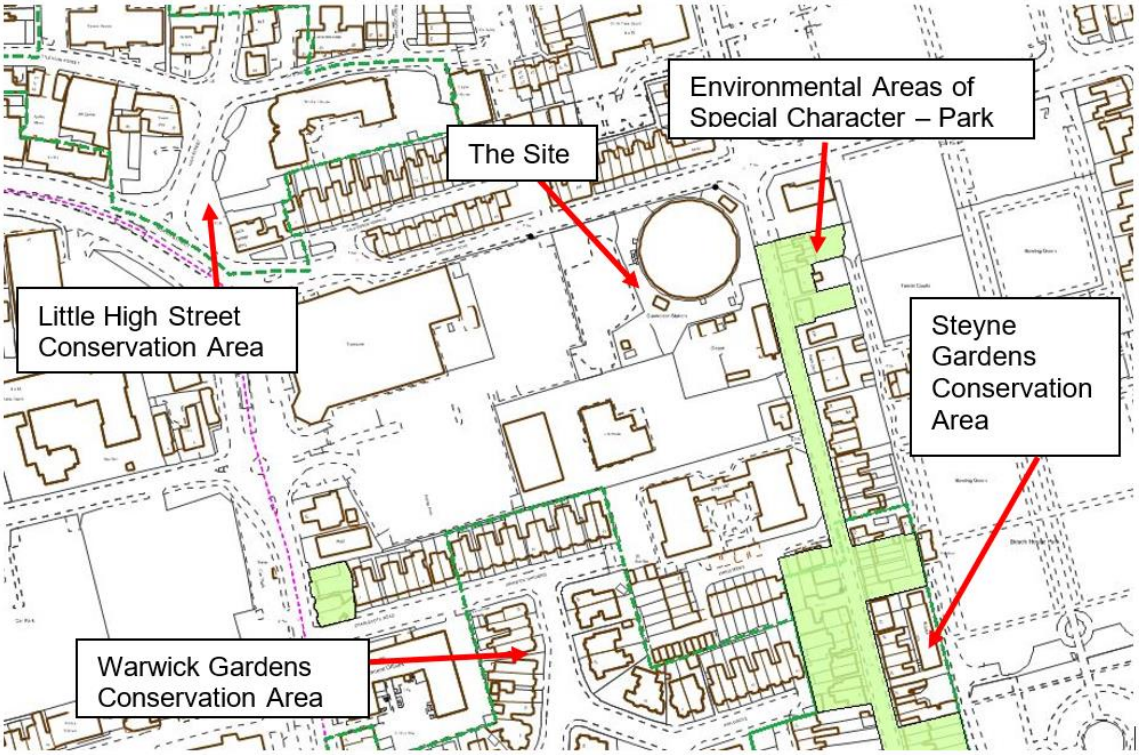


Figure 4: Heritage Assets and Environmental Area of Special Character

### Environmental Features

2.19. The site is generally free of any defining landscape or ecological features. It is also located within Flood Zone 1, which means it is at low risk of flooding. The site itself is relatively flat in nature although land levels do gradually rise from north to south. There is also some degree of level change between the site and its surroundings where ground levels within the site are raised by varying degrees (up to a metre in places).

### Access

2.20. The existing site access is from the south eastern corner of the site on Park Road. Large gates with security barbed wire on top control access at this point.

**Figure 5: The Site**

# 3. Planning History

## 3.1. Introduction

3.1.1. This section considers the planning history for the site including a review of the engagement undertaken with the Council and other stakeholders prior to submission of the planning application. The Statement of Community Involvement provides details of the public engagement activities undertaken as part of the application process.

3.1.2. This section will firstly summarise the relevant planning history for the site and surrounding area before summarising the pre application / design review panel discussions and feedback received.

## 3.2. Relevant Site History

3.2.1. The Council's online planning register has been reviewed and the following represents the relevant site planning history. The following applications are ordered with the most recent application first:

3.2.2. **EIAOPINION/0006/20-** Land At Former Gasworks Site Park Road Worthing West Sussex - Environmental Impact Assessment (EIA) Screening Opinion in relation to residential development at the former Gasworks Site for up to 250 residential units (potentially including a building of up to 10 storeys) – EIA not required – 18th December 2020 (please refer to Appendix A).

3.2.3. **AWDM/1949/16** - Southern Gas Networks Park Road Worthing West Sussex - Prior Notification of proposed demolition gasholder and associated structures at former gasworks – Application Permitted – 8th February 2017

3.2.4. **AWDM/1013/12** - Southern Gas Networks Park Road Worthing West Sussex - Replacement district pressure reduction station within a new GRP building in a new location on the site – approved – 4th October 2012

## 3.3. Relevant Local Planning History

3.3.1. The following planning history is considered to be relevant to this planning application as it relates to other 'Area of Change' Sites within Worthing town centre. These are also brownfield sites within / close to the town centre and in general have proposed higher density development with taller buildings.

3.3.2. **AWDM/0461/20** - Union Place Car Park, Union Place, Worthing, West Sussex - Application under Regulation 3 for Outline planning permission (with all matters reserved except for access) for the construction of mixed-use development comprising residential units, commercial floor space, hotel, cinema and associated car parking, cycle parking, public realm and landscaping.

3.3.3. Union Place Car Park is allocated for mixed use development under Area of Change 4 of the Core Strategy (2011) and Submission Draft Local Plan under allocation A14. Allocation A14 sets out an anticipated development of 150 units and 7,000 sqm of leisure / commercial space. The application benefits from a resolution to grant planning permission subject to securing a S106 agreement (at the time of writing).

3.3.4. Although the application is an outline application (with all matters except access reserved for later determination), detailed assessment and consideration of the scheme in terms of layout, scale, height mass and design formed part of the consideration of the application. The proposal included development of 6 blocks ranging between 6-14 storeys.

3.3.5. Parameter plans were submitted as part of this application, which are recommended to form part of the approval being secured through condition. The committee report noted:

> *…key parameters in terms of height and overall density of development through a Masterplan, an illustrative scheme with supporting design codes and parameter plans. This has required a significant level of supporting detail.*

3.3.6. This demonstrates that the scheme in all likelihood will come forward as a high density development with taller elements forming part of any future Reserved Matters approval.

3.3.7. **AWDM/0325/19** - Development Site At Former Teville Gate Car Park And Land To The West Teville Road, Worthing, West Sussex - Redevelopment with a mixed use scheme comprising three blocks of residential units (378 in total), 83-bedroom hotel (3,684 sqm), a foodstore (Use Class A1) (1,852 sqm), a gym (Use Class D2) (1,426 sqm), in addition to retail, restaurant and cafe uses (Use Classes A1, A2, A3, A4 & A5) (999sqm) and associated infrastructure including 307 parking spaces, 352 cycle parking spaces, service areas, public realm with associated hard and soft landscaping and private amenity spaces. The application was accompanied by an Environmental Impact Assessment and also benefits from a resolution to grant planning permission subject to securing a S106 agreement (at the time of writing).

3.3.8. Teville Gate is also allocated for mixed use development (incorporating leisure, residential and supporting retail) under Area of Change 5 of the Core Strategy 2011 and under allocation A12 of the Submission Draft Local Plan for 250 residential units and 4,000 sqm of commercial floorspace.

3.3.9. The application referenced above has a resolution to grant planning permission (subject to securing a S106 agreement) for 378 residential units and 7,961 sqm of commercial / tourism and leisure floorspace. The development is proposed to be spread across three main blocks ranging in height and including blocks of 8 storeys, 14 storeys and a 22 storey tower.

3.3.10. **AWDM/1633/16 -** The Aquarena, Brighton Road, Worthing, West Sussex, BN11 2EN - Demolition of the former Worthing Aquarena and car park. Erection of 141 residential apartments within blocks ranging from 4-15 storeys in height, including affordable housing, a 641 sq.m (unspecified use class) commercial unit, a 138 sq.m Pavilion/Cafe, public and private open space, 172 resident's parking spaces and 51 public car parking spaces, with associated landscaping and access arrangements. The application is accompanied by an Environmental Impact Assessment and was granted planning permission on 10th March 2017.

3.3.11. The Aquarena is allocated under Area of Change 1 in the Worthing Core Strategy (2011) for delivery of a new swimming pool, in addition to a mix of uses ranging from hotel use to café/ restaurants, residential, supporting retail or leisure. As above, planning permission was granted in 2017 for 141 residential apartments on the site in blocks ranging in height from 4-15 storeys. The site is currently being built out and is nearing completion.

## 3.4. Pre-Application Activity – Summary

3.4.1. The Applicant has engaged with the Council through a series of initial Pre-Application enquiries and meetings as follows:

| | |
|---|---|
| 5th October 2020 | Pre-Application Meeting (Worthing Borough Council). |
| 28th October 2020 | Pre-Application Meeting (Worthing Borough Council). |
| 24th November 2020 | Pre-Application Meeting (Worthing Borough Council). |
| 23 December 2020 | Highways Pre-Application Meeting (West Sussex County Council) |
| 13th April 2021 | Pre- Application Meeting (Worthing Borough Council) |
| 19th April 2021 | Pre Application Meeting (Worthing Borough Council (EHO) / EA) |
| 26th May 2021 | Pre-Application Meeting (Worthing Borough Council) |
| 8th June 2021 | Pre Application Meeting (Worthing Borough Council (Viability)) |
| 9th June 2021 | Pre Application (Worthing Borough Council (Drainage)) |
| 23rd June 2021 | Pre-Application Meeting (Worthing Borough Council (EHO)) |

3.4.2. In addition to this engagement with the Council, the Applicant has also presented the proposed scheme to 2no. independent Design South East Review Panel meetings as follows:

| | |
|---|---|
| 11th November 2020 | Design South East 1st Design Review Panel |
| 24 th March 2021 | Design South East 2nd Design Review Panel |

3.4.3. These meetings offered the Applicant an opportunity to discuss proposals with Officers and to gain feedback which was used to subsequently amend the scheme. Only two formal written responses were received (please refer to Appendix B and C for details).

3.4.4. Furthermore, three Public Consultation events also took place. Further information on the public consultations undertaken and how the scheme evolved in response is set out in the Statement of Community Involvement submitted with this Planning Application.

3.4.5. The detail of the design evolution of the proposal is explored in greater detail in the accompanying Design and Access Statement.

# 4. The Proposal

4.1. This Application seeks full planning consent 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.

### Housing Mix and Amenity Space Provision

4.2. The proposed apartment mix is as follows:

| Accommodation Type | Number of Units | % of Total Provision |
|---|---|---|
| Studio Apartment | 10 | 5% |
| 1 Bed Apartment | 50 | 24% |
| 2 Bed Apartment | 141 | 67% |
| 3 Bed Apartment | 8 | 4% |
| **Total:** | **209** | **100%** |

**Table 1 Proposed unit mix**

4.3. This apartment mix caters for a wide range of future occupants including first time buyers, families and downsizers. Each unit is designed to meet (as a minimum) space standards in accordance with the Nationally Described Space Standards. The majority of the dwellings will meet the M4(2) standard (meaning that properties have been designed to be inclusive, accessible and adaptable to meet the needs of a wide range of housing needs). The only dwellings which are unable to meet this standard are the top floor maisonette dwellings on Park Road.

4.4. In terms of private external amenity space, each unit will benefit from either a balcony, a small garden space (for ground floor units) or a terrace (upper storey of Block B).

4.5. A residents' lounge is proposed on the ground floor of Block B. This area will allow future residents the additional opportunity to work, relax and socialise in an indoor environment.

### Layout, Scale and Appearance

4.6. The development will be spread across 5 blocks (Blocks A-E) of varying heights. Block B is located at the centre of the site and is the tallest element at 7 storeys. Blocks A, C, D and E vary in height, utilising setbacks to reduce mass at sensitive site boundaries.

4.7. Lower scale development is proposed around the perimeter of the site on Park Road, Lyndhurst Road and on the southern section of Block A where surrounding existing development is of a lesser height. The proposal steps up in height within the more central parts of the site away from more sensitive frontages.

4.8. The proposed building heights are as set out within Table 2.

| Block | Building Heights |
|---|---|
| A | **Five storeys** with a three-storey element (south side of Block A) and four storey element (north side of Block A). |
| B | **Seven storeys** (seventh storey set back). |
| C | **Five storeys** with a three-storey 'street frontage' element fronting Lyndhurst Road. |
| D | **Five storeys** with three storey 'street frontage' elements fronting Lyndhurst Road and Park Road. A four storey element sits on the southern side of Block D adjacent to the central courtyard. |
| E | **Four storeys** with a three-storey 'street frontage' element fronting Park Road. |

Table 2: Storey Heights

4.9. The approach to height, mass, form and layout has been informed fully by a 'design-led' approach to the scheme. The central courtyard positioning within the heart of the proposal, pedestrian access through the site (considered further below) and the height, form and mass of the proposal has been sensitively considered given the surrounding context. This is explored in greater detail within Section 6 of this Statement and the Design and Access Statement.

4.9.1. The street frontage elements fronting both Lyndhurst Road and Park Road are set at three storeys, reflecting the character and domestic scale of development of these residential streets.

4.9.2. On Park Road, the street frontage elements feature a mansard roof, whereas the approach along Lyndhurst Road has been to adopt a flat roof design to differentiate the two road frontages (reflecting comments raised at the second Design Review Panel, which specifically referred to a differential approach to the treatment of the perimeter / street frontage buildings).

4.9.3. On Park Road, the street frontage properties include traditional front doors with direct access onto the residential street. The building lines of the street frontage elements are set back away from the highway providing space for footpath improvements, street trees and landscaping.

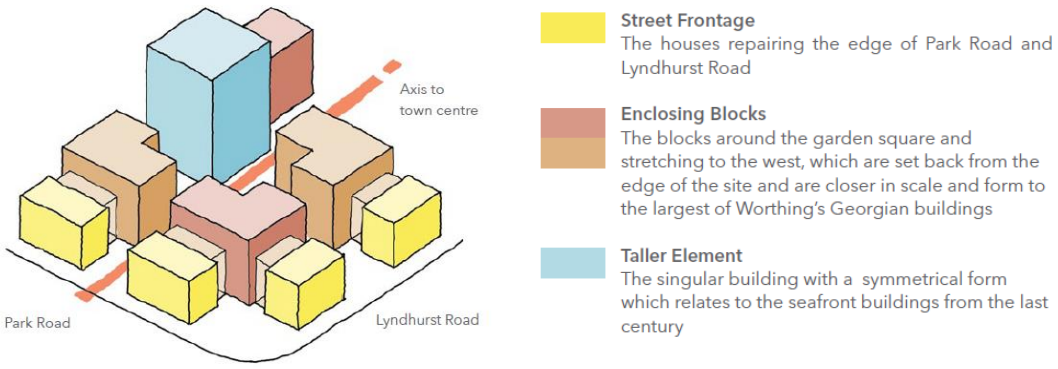


Figure 6: Concept Plan

4.10. The street frontage elements are attached to blocks C, D and E ('enclosing blocks') which sit further within the site at greater height. A connecting element creates a visual break between the street frontage elements and these 'enclosing blocks'.

4.11. Block A would be seen as stepping up in height toward the central taller element with a three-storey element on the southern side of the block and four storey element on the northern side (in views from the west). The four storey element also wraps around the eastern side of the block. Block A links with Block B.

4.12. Block B (the 'taller element') sits at seven storeys. This has been positioned within a central part of the site to ensure it has the least impact to surrounding uses. This taller element has been articulated to reduce mass and perception of height at the upper level.

### Materials

4.13. In terms of materials, the development proposes a mix of materials that are both traditional in nature and in keeping with the local vernacular. Three red/brown brick types together with green and light / cream masonry, window frames and metalwork are proposed on buildings. Refer to the Design and Access Statement for further details.

### Permeability

4.14. A critical element of the design has been the positioning of the central axis which runs through the site north to south and east to west allowing permeability both visually and in terms of pedestrian movement routes. This has been a critical design element of the scheme from inception (ensuring that the needs of pedestrians are prioritised). The internal levels of the site have been designed to ensure level access throughout; tying-in with both Park Road and Lyndhurst Road.

4.15. On Lyndhurst Road, the scheme was designed to be set back sufficiently to enable the delivery of a cycle path along this frontage. During pre-application discussions it was agreed with Worthing Borough Council that, in the absence of comment or commitment from West Sussex County Council (WSCC) regarding the likelihood of comprehensive cycle infrastructure in this area, land fronting Lyndhurst Road would benefit as an area of landscaping albeit safeguarded for the use as a cycle path should that become a possibility in the future.

### Landscaping

4.16. Public amenity space and landscaped areas are proposed to the centre of the development along the central axes and importantly along the frontages of Lyndhurst Road and Park Road. In addition, the central courtyard area would provide for spaces to sit, rest and play (with this area and axis routes providing the opportunities for informal activity).

4.17. Low-level flint and brick walls are proposed to the boundary treatment along Park Road and Lyndhurst Road. A significant amount of tree, hedge and shrub planting is proposed throughout the site and on street boundaries. Please refer to the Landscape Strategy for further details.

### Vehicular Access and Parking

4.18. Three vehicular accesses are proposed. The main access is located just to the north of the existing access on Park Road. Most of the parking for the site is available from this access. A second access on Lyndhurst Road is proposed for a limited number of parking spaces, acting also as a service access to some of the blocks (in relation to waste disposal, deliveries and emergency access). A third access at the very north east of the site is provided to enable access to the gas governor (including provision of a security barrier to ensure residents cannot access / park in this area).

4.19. Vehicular parking is proposed to the ground floor of Building A and along the southern section of the site. This will provide 110 car parking spaces (of which 40% will have active electric vehicle charging points). This provision also incorporates space for an onsite car club (two spaces). The parking provision is 0.53 spaces per dwelling. The scheme will provide for 205 no. cycle parking spaces.

4.20. The development is in a highly sustainable town centre location and the development will be promoted as a low car ownership development with sustainable methods of transport integral to the proposal. This is discussed further within Section 6 of this Statement.

# 5. Policy Overview

## 5.1. Introduction

5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that in making any determination under the Planning Acts the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan consists of the **Worthing Core Strategy 2011** and the **saved policies of the Worthing Local Plan 2003**. The National Planning Policy Framework (the 'Framework'), National Planning Practice Guidance (NPPG) and supplementary planning guidance are all material considerations.

5.1.2. Worthing Borough Council are also currently preparing a new Local Plan which, when adopted, will replace the borough's existing local planning policies. The **Submission Draft Worthing Local Plan 2021** (Submission Draft Local Plan) is a material consideration in the determination of this planning application. During the preparation of this Planning Application, the Submission Draft Local Plan has been submitted to the Secretary of State alongside a schedule of proposed amendments. This is considered in more detail under Section 5.5 of this Statement and within the Appraisal section (Section 6).

5.1.3. In preparing the planning application, the applicants took the view to address emerging policy requirements. As such the application has been drafted to meet the requirements of the modified Submission Draft Local Plan.

5.1.4. This section details relevant policies. A detailed assessment of how the proposal relates to these policies (where relevant) is carried out in section 6.

## 5.2. Worthing Core Strategy (2011)

5.2.1. The relevant policies from the Worthing Core Strategy as are follows:

- **Policy 2** Areas of Change
- **Policy 7** Meeting Housing Need
- **Policy 8** Getting the right mix of homes
- **Policy 10** Affordable Housing
- **Policy 12** New Infrastructure
- **Policy 13** The Natural Environment and Landscape Character
- **Policy 14** Green Infrastructure
- **Policy 15** Flood Risk and Sustainable Water Management
- **Policy 16** Built Environment and Design
- **Policy 17** Sustainable Construction
- **Policy 18** Sustainable Energy
- **Policy 19** Sustainable Travel

## 5.3. Worthing Local Plan 2003 (Saved Policies September 2007)

5.3.1. The relevant policies from the Worthing Local Plan 2003 (as saved in 2007) are as follows:

- **Policy RES7** Development which has potential to generate pollution
- **Policy RES9** Contaminated land
- **Policy RES12** Infrastructure and services required
- **Policy BE1** Building design

- **Policy BE25** Environment Areas of Special Character
- **Policy CT3** Protection and Enhancement the Seafront Area
- **Policy TR9** On site parking
- **Policy H18** Reduction of amenity of local residents
- **Policy LR8** Provision of Play Space/ Outdoor Recreation Space in Hosing

## 5.4. Submission Draft Worthing Local Plan (2021)

5.4.1. The Submission Draft Local Plan has evolved during the course of the preparation of this Planning Application. The Plan has been submitted to the Secretary of State and as such is subject to further amendment through the Examination process. The Submission Draft Local Plan was submitted to the Secretary of State on Friday 11 th June 2021 for independent examination and a schedule of proposed modifications has been uploaded on the Council's website. Policies quoted within this Statement include proposed modifications.

5.4.2. Paragraph 48 of the Framework (2019) states that Local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant Policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

5.4.3. The relevant Policies from the Submission Draft Local Plan are as follows:

- **Policy SP1** Presumption in favour of sustainable development
- **Policy SP2** Climate change
- **Policy SP3** Healthy communities
- **Policy SS2** Development sites
- **Policy SS3** Town centre
- **Policy A9** Lyndhurst Road Allocation
- **Policy DM1** Housing mix
- **Policy DM2** Density
- **Policy DM5** Quality of the built environment
- **Policy DM6** Public realm
- **Policy DM7** Open space, recreation and leisure
- **Policy DM8** Planning for sustainable communities / community facilities
- **Policy DM9** Delivering infrastructure
- **Policy DM15** Sustainable transport and active travel
- **Policy DM16** Sustainable design
- **Policy DM17** Energy
- **Policy DM19** Green Infrastructure
- **Policy DM20** Flood risk and sustainable drainage
- **Policy DM21** Water quality and sustainable water use
- **Policy DM22** Pollution
- **Policy DM24** The historic environment

## 5.5. Supplementary Planning Documents and Guidance

- **Developer Contributions –** July 2015
- **Guide to Residential Development SPD –** November 2013
- **Tall Building Guidance SPD –** November 2013
- **Space Standards SPD –** February 2012
- **Warwick Gardens Conservation Area Appraisal –** 2009
- **Worthing Evolution: Town Centre and Seafront Masterplan –** 2006

## 5.6. Other Relevant Guidance

5.6.1. Other relevant guidance has been considered as part of this planning submission and reference has been made within the accompanying application documents and reports where relevant.

## 5.7. National Planning Policy Framework (2019)

5.7.1. As well as local policy, the proposed development will need to be in accordance with the National Planning Policy Framework (the Framework). The Framework was adopted in 2012 with a revised version published in February 2019. At its heart is the presumption in favour of sustainable development relating to both plan-making and decision-taking (paragraph 11). There are three dimensions to sustainable development: social, economic and environmental.

5.7.2. The following are considered the most relevant sections of the Framework applicable to the proposed development:

- **Chapter 2** Achieving Sustainable Development
- **Chapter 5** Delivering a Sufficient Supply of Homes
- **Chapter 7** Ensuring the Vitality of Town Centres
- **Chapter 8** Promoting Healthy and Safe Communities
- **Chapter 9** Promoting Sustainable Transport
- **Chapter 11** Making Efficient Use of Land
- **Chapter 12** Achieving Well Designed Places
- **Chapter 14** Meeting the Challenge of Climate Change, Flooding and Coastal Change
- **Chapter 15** Conserving and Enhancing the Natural Environment
- **Chapter 16** Conserving and Enhancing the Historic Environment

5.7.3. The Framework has been updated during the course of preparing this application (as of 20th July 2021). We have reviewed amendments as part of the preparation of this application and the proposal is considered to fully accord with the new version of the Framework. Where documents / reports reference the 2019 version of the Framework we are satisfied that there is no material change between the requirements of the 2019 version and the 2021 version. Where references are made within this Statement they refer to the 2019 version of the Framework.

## 5.8. National Planning Practice Guidance (NPPG)

5.8.1. NPPG elaborates on the policies of the Framework, and reaffirms the requirement for good design, and the presumption in favour of sustainable development.

5.8.2. NPPG also provides details on the Community Infrastructure Levy and confirms that where part of an existing building has been in lawful use for a continuous period of 6 months within the past 3 years, parts of that building that are to be demolished or retained can be taken into account. In this respect, existing buildings on site are proposed for removal which meet the requirements set out above. This is detailed in CIL Form 1 which accompanies the planning application and discussed further within Section 6 of this Statement.

# 6. Planning Appraisal

## 6.1. Introduction

6.1.1. This section of the statement considers how the proposed development complies with adopted and emerging local policies and where relevant national policies set out within the Development plan. The following matters are considered to be the principal considerations with regards to the proposal:

- **Principle of Development**
- **Housing Need, Quantum and Brownfield Land**
- **Design, Form and Appearance**
- **Townscape Visual Impact**
- **Heritage**
- **Housing Mix**
- **Residential Amenity and Outlook**
- **Noise**
- **Overheating**
- **Daylight / Sunlight**
- **Archaeology**
- **Contamination**
- **Ecology**
- **Transport, Access and Parking**
- **Air Quality**
- **Sustainability**
- **Microclimate and Wind**
- **Flood Risk, Water and Drainage**
- **Affordable Housing Provision and Viability**
- **S106 / CIL**

## 6.2. Principle of Development

6.2.1. The site is located within the built-up area of Worthing within the identified Town Centre designation (where the focus within the Core Strategy and Submission Draft Local Plan is for regeneration and renewal). The site is identified for development within the existing Development Plan for a mixed residential development under Area of Change 7 and is furthermore identified within the Submission Draft Worthing Local Plan within emerging policy SS2 (under reference A9) for residential development. Pending formal examination this document will allocate the site for residential development. An 'indicative capacity' of up to 150 units is identified within this plan. Policy A9 states:

> *Development Requirements - any future development proposals should:*
>
> *a) provide a high quality residential development;*
>
> *b) undertake detailed investigations of the contamination to assess the level of remediation required;*
>
> *c) deliver a surface water drainage scheme that ensures that surface water is not discharged through contaminated soils;*
>
> *d) undertake an assessment of the archaeological remains;*

*e) undertake an extensive phase 1 habitat survey and desktop study and provide mitigation as appropriate;*

*f) address provision for suitable access/egress on Park Road and Lyndhurst Road;*

*g) enhance permeability and provide an attractive and accessible pedestrian link from the site to the High Street and town centre – this should include consideration of an improved footway / cycleway along the northern boundary*

*h) be sensitive to the Conservation Areas that lie in close proximity to this site.*

6.2.2. The site is a disused brownfield site located within a highly sustainable location. Development of such sites is critical to the delivery of housing in Worthing (as discussed within the following section). The emerging Local Plan is clear that:

> *… the reality is, that when compared to many other local authority areas, there are relatively few options for growth. As a result, in many respects, the spatial strategy taken forward in this Plan is similar to that incorporated within the Worthing Core Strategy (2011) which placed a strong emphasis on regeneration and transforming key previously developed sites within the urban area. This approach reflects the NPPF which* ***encourages local authorities to make as much use as possible of brownfield sites to meet development needs***.

6.2.3. Given the allocated nature of the site for residential development the proposed development is considered to be entirely acceptable in principle.

## 6.3. Housing Need, Quantum and Brownfield Land

6.3.1. The Core Strategy is silent on the capacity of the site whilst the Submission Draft Local Plan policy SS2 / A9 as set out above, identifies an 'indicative capacity' of 150 dwellings. It is clear from the wording of the policy that 150 dwellings is not a maximum figure, merely an indication of an approximate level of development.

| SOURCES OF HOUSING SUPPLY (2020-2036) | NUMBER OF DWELLINGS |
|---|---|
| Commitments | 909 |
| Windfalls | 871 |
| SHLAA Sites (not including those incorporated as allocations) | 139 |
| Local Plan Allocations | 1753 |
| HOUSING SUPPLY (From all sources 2020 - 2036) | 3672 |
| ANNUAL TARGET (2020 - 2036) | 230 |

**Table 3: Submission Draft Worthing Local Plan 2021 - Housing Supply**

6.3.2. In the context of housing delivery within the Borough, it is the case that allocated sites such as the Gasworks site are to be the focus for housing delivery over the emerging plan period. The housing delivery target figure of 3,672 dwellings of the emerging Local Plan is shown in Table 3 (taken from the background text which supports Policy SS2). Table 3 demonstrates the clear reliance on housing allocations for the delivery of housing (47% of total supply). This proportion rises higher still when commitments are removed from the total, with allocations accounting for 63% of delivery.

6.3.3. These figures underline the importance of the emerging Local Plan Allocation sites in the delivery of new homes. ECE Planning (on behalf of the applicant) submitted representations to the Submission Draft Worthing Local Plan Regulation 19 consultation earlier in the year. We were clear in these representations that in order to meet its strategic objectives (of focussing development on highly sustainable, brownfield sites), the Council cannot allow allocations to under-deliver.

6.3.4. There is a chronic housing land supply and delivery shortfall in Worthing. The Council can only currently demonstrate a 1.32 year supply of deliverable sites when measured against the capped (40%) Standard Methodology (using 2014 Household Projections) of 885 dwellings per annum (OAN) (with 20% buffer).

6.3.5. In addition to this, Worthing Borough Council only delivered 54% of 'required homes' in the last three years with regards to the Housing Delivery Test with an under delivery of approximately 950 homes over that period. This is a significant shortfall in provision of new homes and is a material consideration of great weight.

6.3.6. In this regard, the provision of increased housing delivery within the District must carry significant weight. Indeed within a recent appeal decision in the neighbouring Adur District (reference APP/Y3805/W/20/3256355 at Land north of The Haven, Brighton Road, Lancing BN15 8EU) an Inspector noted with regards to housing delivery:

> *The Council's strategic sites have begun to deliver units but predicted build-out rates cannot be guaranteed. The proposal's contribution to the delivery of new homes, set in the context of a history of under-delivery of housing in the 3-year period since 2017, therefore attracts significant weight. Even relatively small sites such as this can contribute to addressing the current housing shortfall.*
>
> *Paragraph 118 of the Framework promotes and supports the development of brownfield and under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained – as in this particular case. These aspects of Government policy all weigh in favour of a grant of planning permission.*

6.3.7. The development referred to was for a scheme on an unallocated site of nine dwellings. This demonstrates that great weight must be applied to delivery of housing in the planning balance and this is even more so the case for large strategic sites on which the Council heavily rely to deliver housing.

6.3.8. It is clear from the strategic policies and development management policies of the Submission Draft Local Plan that focussing density on sustainable sites is a priority. Strategic Objective SO17 states:

> *"Make efficient use of previously developed land to **maximise** housing delivery on sustainable sites in recognition of the environmental and physical constraints to development posed by the sea and the South Downs".*

6.3.9. In the absence of an up-to-date Development Plan, the Council must apply the presumption in favour of sustainable development - the 'tilted balance' in favour of development in accordance with paragraph 11 of the Framework. Given the position with regards to five year housing land supply (and the fact that the Core Strategy is now 10 years old), paragraph 11 clearly applies.

6.3.10. Paragraph 11 requires that where the policies which are most important for determining the application are out-of-date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. As set out within the Conclusion to this Statement, the proposed benefits significantly and demonstrably outweigh any impacts of the scheme.

6.3.11. In the context of housing need and the allocated nature of the site, the proposed quantum of development is considered to be beneficial in the context of making efficient use of land.

## 6.4. Design, Form and Appearance

6.4.1. The proposals have been created following a "design led" approach from the outset. The applicant has worked positively and proactively with officers of the Council and Design South-East to balance making the most efficient use of an allocated, town centre, brownfield site whilst also respecting the sensitive surroundings and character of the area.

### Density

6.4.2. As set out within the preceding chapter, the strategic approach of the Submission Draft Local Plan is to ensure sustainable sites are maximising housing delivery. Policy DM2 – Density requires development proposals to:

> *… make the most efficient use of land, which will usually mean developing at densities above those of the surrounding area. The optimum density of a development should result from a design-led approach to determine the capacity of the site.*

6.4.3. As set out within the Submission Draft Worthing Local Plan, a design-led approach should *consider the context and character of the site and local area*, to ensure that density is appropriate.

6.4.4. The Design and Access Statement and this Planning Statement sets out the context and character of the local area (summarised as being a mix of domestic scale dwellings and the larger buildings associated with the town centre). The site itself is unattractive and closed off. In our view it detracts from the character of the area.

6.4.5. Through the design led approach, the proposal has sought to sensitively balance the requirements of making the most efficient use of this allocated, sustainable, town centre site whilst ensuring the negative impacts of increased density (such as excess site coverage, height, mass etc.) are minimised whilst taking opportunities to positively address pre-existing issues and constraints associated with the site. Key considerations from the outset in spatial terms include:

- Provision of a high quality and meaningful central open space as proposed by the central courtyard.
- Well-considered axial pedestrian routes through the site which positively increase permeability.
- Setting back of the building line on Lyndhurst Road and Park Road to provide for better pedestrian infrastructure and public realm improvement.
- Sufficient car parking space, vehicular access and access for servicing / deliveries.

6.4.6. The proposed layout is considered to address existing issues with the site. Key infrastructure requirements, such as car parking, open space and public realm are considered to be adequately provided for within the proposal.

6.4.7. In terms of height, mass and scale, the conceptual approach to development of the site clearly considers the context and character of the area (Figure 6). An appropriate scale of development along the Park Road and Lyndhurst Road frontages is proposed to reflect the domestic scale of development in this location.

6.4.8. Mass and height of the buildings appropriately increases through the site away from these frontages. The mass and height of larger buildings are acceptable given the town centre location and requirements to make the best use of the site. As demonstrated elsewhere within this Statement, the proposal does not lead to any unacceptable impacts in visual, heritage and character terms (all of which were considered iteratively through the design evolution of this scheme).

6.4.9. As such, the design led approach has fully informed the density of the site whilst also making the most efficient use of land. Furthermore, the proposal is considered to align in density terms (190dph) to other nearby sites (Bayside (204dph) Teville Gate (259dph) and Union Place (148dph albeit with a significant amount of non-residential uses)).

**Appearance and Character**

6.4.10. Emerging Policy DM5 - Quality of the Built Environment of the Submission Draft Local Plan requires development to meet a number of design related criteria. The proposal has sought to address these considerations whilst also delivering an appropriate scale and density of development to ensure that the scheme is viable and makes the most efficient use of a highly sustainable, town centre, brownfield site.

6.4.11. The conclusion to the Design and Access Statement provides a summary position with regards to how the scheme meets the requirements of policy DM5 of the Submission Draft Local Plan and the criteria of the National Design Guide as required by recent amendments to the Framework. The Design and Access Statement itself provides a detailed assessment of how the scheme has been developed taking into account the local context, constraints and opportunities from a design perspective.

6.4.12. Policy BE25 of the Local Plan 2003 states that:

> *all development within an Environmental Area of Special Character, as shown on the Proposals Map, will be required to reflect the particular character of the area concerned. Development which would adversely affect existing features which contribute to that character will not be permitted.*

6.4.13. The site is not located within the Area of Special Character but adjacent to it on Park Road (Figure 4). However, it is clearly apparent through the provision of the high-quality boundary treatment (low flint wall), soft landscaping, set-back building line of the street frontage buildings and form / mass of the proposal that the designation has carefully been taken into consideration. This form of development is in keeping with the character of the area.

**Height**

6.4.14. The Design and Access Statement includes a Tall Buildings Statement which addresses the design related criteria of the Tall Building Guidance Supplementary Planning Document (SPD). The proposed development ranges in height from three storeys (along Park Road and Lyndhurst Road) with elements at four, five and seven storeys. As such, the proposal is considered to contain some 'Tall Buildings'. However, in our view, only the seven storey element can be considered to be 'substantially taller' than buildings within the immediate context.

6.4.15. The wider context includes high density development sites such as Union Place and Teville Gate as well as the former Aquarena (Bayside).

6.4.16. Whilst Union Place is an Outline application, development of up to 14 storeys was considered as part of the determination of the application (and the Council recommended approval on the basis of such heights secured through conditions requiring accordance with approved 'parameter plans'). Teville Gate is a full application which included a tower of 22 storeys. Both applications benefit from a resolution to grant permission subject to securing a S106 legal agreement. Bayside which is currently nearing completion, is set at 15 storeys in height.

6.4.17. The taller buildings of Worthing town centre also form part of the wider context. In this respect, the proposal is considered modest in height whilst being located within the town centre boundary of Worthing.

6.4.18. Whilst greater height was considered acceptable by the Design Review Panel (at 9 storeys – refer to Appendix C), the applicants took the decision to reduce the height based on resident feedback following public consultation.

6.4.19. The only element of the scheme, considered to be a 'tall building' has been reduced in scale significantly over the design process and is now only 7 storeys in height, responding to both public opinion and professional advice.

**Summary**

6.4.20. We consider the proposals are informed by all relevant consultees and stakeholders to produce a truly design led scheme that will enhance the site and local area more generally. In design terms the proposal is considered to be acceptable.

## 6.5. Townscape Visual Impact

6.5.1. Emerging Policy DM5 – Quality of the Built Environment requires applications to respect and enhance the character of the area including consideration of form, design, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. The policy also requires applications to enhance the local environment by way of its appearance and character, and make a positive contribution to the sense of place, local character and distinctiveness of an area.

6.5.2. Much of this has been considered within the Design and Access Statement and within this Planning Statement. A Townscape and Visual Impact Assessment (TVIA) has also been produced which considers the potential impact of the development in visual townscape character terms.

6.5.3. The TVIA demonstrates the scale of change through the use of wireline visuals and rendered images. The locations of these images were agreed in advance in consultation with Worthing Borough Council. Additional visuals are also included within the Design and Access Statement.

6.5.4. In allocating the site for development within the Submission Draft Local Plan, and given its policy thrust alongside national policy requirements to make the best possible use sustainable brownfield land, the Council has implicitly acknowledged that a high degree of a change would be necessary to develop the site. The scheme has also been sensitively designed from a townscape perspective having been positively considered in both pre application discussions and Design Review Panel meetings.

6.5.5. The applicant has worked hard to address elements considered harmful in townscape terms through these discussions. Two key examples include the development of the north eastern corner of the site which was initially of much greater scale and mass and has now been significantly reduced being less prominent in views from the east. Additionally, the height of Block B has decreased through the design process with a change in materials at upper floors and a stepping back or articulation of the upper floor to diminish the sense of mass and height (refer to Design and Access Statement for further details).

6.5.6. Given the housing need position and requirements to make best use of highly sustainable brown field sites, the proposal is considered to strike an appropriate balance between maximising development whilst ensuring visual impacts are kept to a minimum.

6.5.7. In terms of townscape character, the TVIA positively concludes:

> *…the Proposed Development would improve the townscape character of the 'TCA 01: Town Centre Mixed Use Edge', leading to an overall moderate to minor and beneficial effect. The Proposed Development would also indirectly lead to a moderate to minor and neutral effect on TCA 02: Town Centre Residential Edge and a minor and neutral effect on TCA 03: Beach House Park and TCA 05: Northern Residential.*

6.5.8. In terms of Visual Impact, the TVIA considers there to be only beneficial and neutral impacts as follows:

> ***Moderate and beneficial**: RE01: Properties odd nos. 3 to 61 along Lyndhurst Road, RE02: Properties even nos. 80 to 92, and no. 83 and Park Court and RE03: Kings Hall*
>
> ***Moderate to minor and beneficial**: RE04: Properties odd nos. 1 to 51 Charlecote Road, OS01: Beach House Park, OT02: Waitrose and no. 48 High Street, RD01: Lyndhurst Road and RD02: Park Road*
>
> ***Minor and beneficial**: OT01: Worthing Hospital*
>
> ***Minor and neutral**: RE05: Properties associated with Warwick Gardens, Wyke Avenue, Elm Road, Ash Grove, Warwick Place and the southern end of Park Road, OS05 South Downs National Park and RD03: Union Place, North Street and High Street*

6.5.9. In townscape character and visual impact terms the proposal is considered to be acceptable.

## 6.6. Heritage

6.6.1. In terms of heritage considerations, emerging Policy DM24 is of relevance and states that permission will only be granted provided that the appearance, significance, or historic character of heritage assets are not be adversely affected. The policy requires that a Heritage Statement is submitted with applications where harm to heritage assets may occur.

6.6.2. The Framework sets out a clear test for development at paragraphs 193 – 196 which relates to harm to heritage assets (be this substantial, less than substantial or no harm). Paragraph 196 states:

> *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.*

6.6.3. The application is accompanied by a Heritage Statement which considers the impact of the development to the surrounding heritage assets. In conclusion, it notes that the site will not physically impact on any listed building and that 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.

6.6.4. The Heritage Statement has assessed these and considers there to be no harm to the significance of 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 Block B will be perceptible. In this respect, the Heritage Statement concludes:

> *The application site is located to the immediate north of the Warwick Gardens Conservation Area. While the majority of the proposed development will not be evident in views from within the designation, the attic storey to Block B will be visually evident above the ridgeline to the three-storey Charlcote Road terrace group in views looking north from Warwick Gardens. This aspect of the proposal will cause some harm to the setting of the Conservation Area (deemed to be at the lower end of the less than substantial harm scale), given that it will be evident in backdrop views of the terrace group from Warwick Gardens. It is considered, however, that the lightness of the facing material to the top storey will lessen its visual prominence in backdrop views of the Charlcote Road terrace group from within the designation, thereby lessening the degree of harm. Warwick Gardens also benefits a number of trees which line either side of the road, which has the benefit of impeding longer views of the Charlcote Road terrace group noted, although it is acknowledged that the top storey to Block B is likely to be evident during the winter months, in particular. The minor level of harm identified will also be outweighed by the benefits associated with the proposal. In the context of housing delivery within the Borough, the less-than-substantial harm should be considered against the importance of allocated sites such as the application site for housing delivery over the emerging plan period. In this respect, such sites are proposed to deliver around 50% of the housing requirement (refer to the ECE Planning Statement for further details). The application site plays an extremely important role, therefore, in contributing to the housing delivery target for Worthing. The submission draft WBCDLP promotes maximisation of housing delivery on sustainable sites making the most efficient use of land (Policies SO17 and DM2). The proposal clearly meets these requirements.*

**Figure 7: View from Warwick Gardens Conservation Area**

6.6.5. The scheme is not considered to be harmful to any other heritage asset. The view is demonstrated in Figure 7. The harm on a limited number of views from within the Warwick Gardens Conservation Area can only be considered very low on the less than substantial spectrum as set out above. In addition, as noted above, this must be considered against the context of the importance associated with allocated sites in delivering housing need locally and the significant benefits of the scheme (as set out within the Conclusion of this Planning Statement).

6.6.6. It should be noted also that the proposal has been through a rigorous design evolution including discussions with the Council's Conservation Officer to discuss impact in heritage terms. Amendments were made to minimise such impact and working with Officers, detailed discussions regarding the height / design of Block B and impact on the Conservation Area led in part to a reduction in scale.

6.6.7. A further amendment to Block B to reduce impact was to dress the upper most part of building in a lighter material and erode the bulk and mass of this element to create a lighter and less visually domineering building from surrounding views. A significant effort was taken to ensure that the views of Officers were taken on board during the design process.

6.6.8. For the reasons set out above, we consider the proposal to be entirely acceptable with regards to heritage impact.

## 6.7. Housing Mix

6.7.1. Policy 8 of the Worthing Core Strategy is about housing mix and states that *higher density housing including homes suitable for family occupation to be located in and around the town centre*. The background text to the policy states that there *remains a valid role for flats to play in higher density town centre developments*.

6.7.2. The proposed dwelling mix includes studios, one and two bedroom properties suitable for the town centre location, in addition to larger two and three bedroom family sized properties. In our view the mix is compliant with the Core Strategy policy.

| Accommodation Type | Number of Units | % of Total Provision |
|---|---|---|
| Studio Apartment | 10 | 5% |
| 1 Bed Apartment | 50 | 24% |
| 2 Bed Apartment | 141 | 67% |
| 3 Bed Apartment | 8 | 4% |
| **Total:** | **209** | **100%** |

**Table 4: Proposed Housing Mix**

6.7.3. Policy DM 1 (Housing Mix) of the Submission Draft Local Plan requires applicants *to consider the most up-to-date evidence of housing needs and demands*. The Worthing Strategic Housing Market Assessment (SHMA, 2020) sets out the following mix for market dwellings:

- 1-bed properties: 5-15%
- 2-bed properties: 40-45%
- 3-bed properties: 35-40%
- 4+-bed properties: 10-20%

6.7.4. Paragraph 8.35 of the SHMA states:

> *How this mix is applied to individual development sites should take account of the nature and location of the site. On sites where there is greater potential to deliver family housing with 3 or more bedrooms this should be prioritised; whereas higher density flatted scheme are more likely to be focused towards the delivery of smaller properties, but should also include a proportion of larger family-sized units with 3 or more bedrooms.*

6.7.5. Policy DM1 states:

> *a) In order to deliver sustainable mixed and balanced communities, the Council will expect all applications for new housing to consider the most up to date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site.*

6.7.6. The proposals are for a high density town centre development which includes an element of larger family sized dwellings and in this respect is considered acceptable. Mix was discussed with the Council during pre application discussions and it was agreed that the proposed general approach to deliver smaller one and two bedroom properties was considered appropriate. The Council stated (please refer to Appendix B)

> *Whilst, the proposed mix would not follow the SHMA preferred mix I do not feel this is problematic as the SHMA looks at overall mix to be achieved in the Borough and obviously greenfield sites will be delivering a greater proportion of large 3 and 4 bed units and for town centre sustainable sites such as this I would support a higher density and need to meet the greater demand for smaller units (as suggested).*

6.7.7. In terms of meeting the needs of older people and people with disabilities, emerging policy DM1 also requires that new dwellings must be designed to meet M4(2) standards and the vast majority of the units are compliant in this respect. Provision of M4(2) dwellings means that the scheme has been designed to be inclusive, provide ease of access to, and circulation within, buildings, together with requirements for facilities for people with disabilities.

6.7.8. In terms of housing mix the scheme is considered to be acceptable.

## 6.8. Residential Amenity and Outlook

6.8.1. This section considers the impacts in relation to outlook, prospect and privacy of the proposal – both in terms of the impacts to existing residents as well as considering the residential amenity of future residents. The following sections consider noise and daylight / sunlight impacts which are linked to residential amenity.

6.8.2. Policy H18 of the Local Plan 2003 seeks to ensure that development will not cause an unacceptable reduction in amenity for local residents. In such instances planning permission will not be permitted.

6.8.3. Policy DM5 of the Submission Draft Local Plan requires that all new development should:

> *not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise or vehicular movements or loss of important open space;*

### Existing Residents

6.8.4. The proposal has been carefully considered with regards to residential amenity impacts to existing residents. It should firstly be acknowledged that the site was formally home to large industrial structures which would have significantly impacted on the amenity of residents. Since the site has been cleared that position has improved.

6.8.5. The site must be considered in the context of the Development Plan allocation for high density development given the highly sustainable town centre location and in light of the significant housing shortfall and delivery issues as set out earlier within this Statement.

6.8.6. The proposal has been carefully designed to ensure the taller elements have been located within more central positions whilst a domestic scale of development (three storeys) is proposed along the residential streets of Lyndhurst Road and Park Road. On the south side of the site, an area of car parking separates proposed and existing built forms to ensure suitable separation distances. In this respect the proposal is not considered to significantly impact the outlook and prospect for existing residents.

6.8.7. The Block Plan, which accompanies this application, broadly demonstrates the separation distances between the proposal and existing dwellings as demonstrated in Figure 8 (approximate building to building distances).

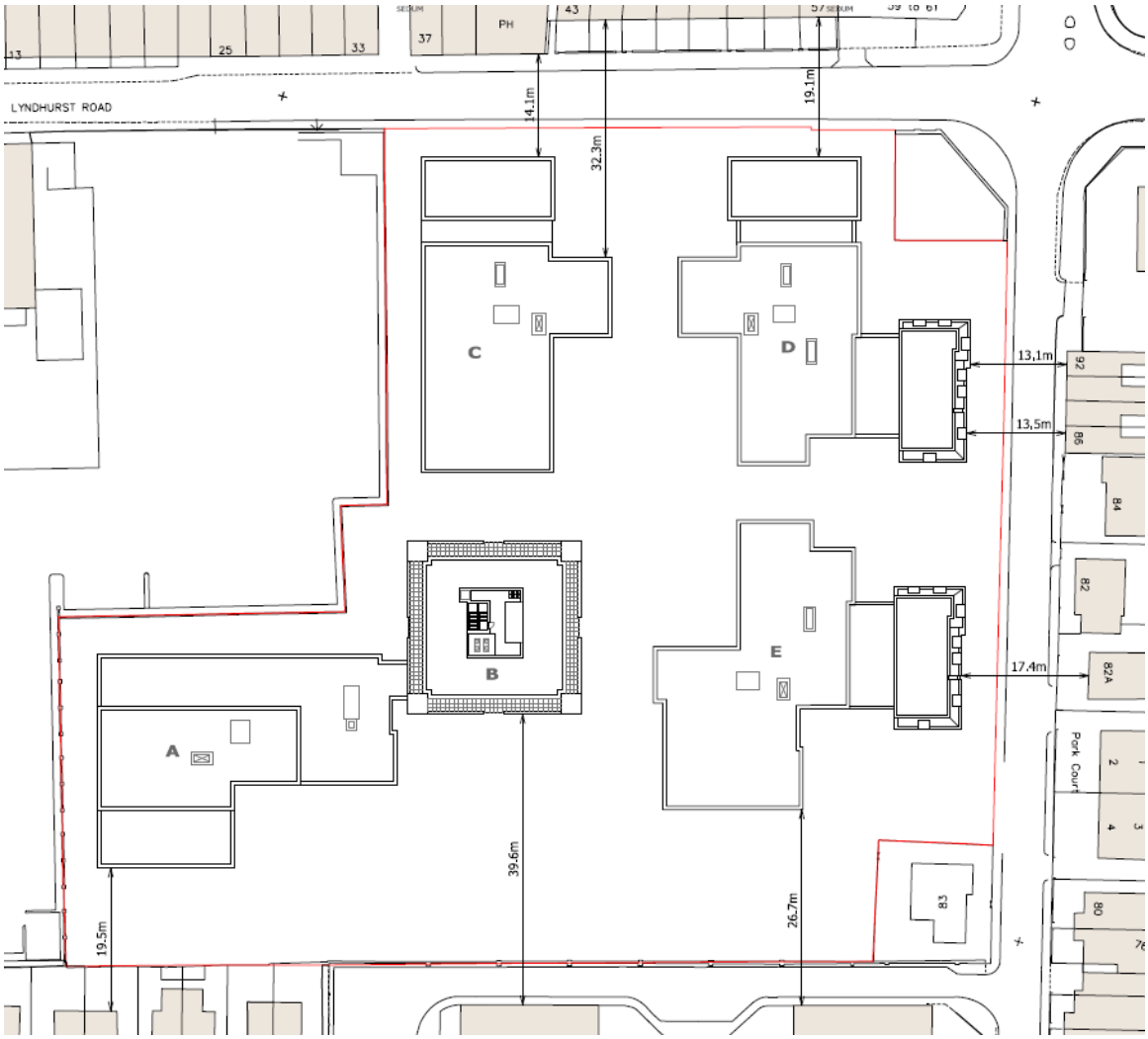


Figure 8: Distances to Existing Properties

6.8.8. On Lyndhurst Road and Park Road the height of the street frontage properties is set at three stories to limit the impact on existing residents. The relationship is front to front with a public highway and associated footpaths separating the blocks. Such a relationship is considered acceptable. The taller elements of Block C, D and E are located at a greater distance away from these properties sitting at five and four storeys. Distances which range between 20m – 32m are considered acceptable in such a town centre location.

6.8.9. On the southern section of the site, Block A is again set at three storeys in height where the proposal sits adjacent to existing built form at approximately 20m distance from the existing residential properties. The greater height of Block A (five storeys) is set further away from existing residential properties to limit impact.

6.8.10. Block B has been located at a sufficient distance from the properties to the south and at approximately 40m this is considered to be to an appropriately distance for a building of this height.

6.8.11. It should be noted also that where possible, balconies and the orientation of main living spaces have been directed away from existing residential uses (for instances the relationship between Block A and properties on Charlecote Road or Blocks C / D and Lyndhurst Road. In each instance orientation is directed away from neighbouring properties).

### Future Residents

6.8.12. In terms of the impact of the development on future residents, the worst-case separation distances are set out below. However, it should be noted that balcony positions, window orientation and internal layout arrangements have been carefully considered to ensure that the proposal is acceptable in privacy, outlook and prospect terms (measurements are approximate):

| | |
|---|---|
| Block B and Block E | 10m extending to 21m |
| Block B and Block C | 9m |
| Block C and Block D | 9m (pinch-point) extending to 24m |
| Block D and Block E | 7m (pinch-point) extending to 15-22m |

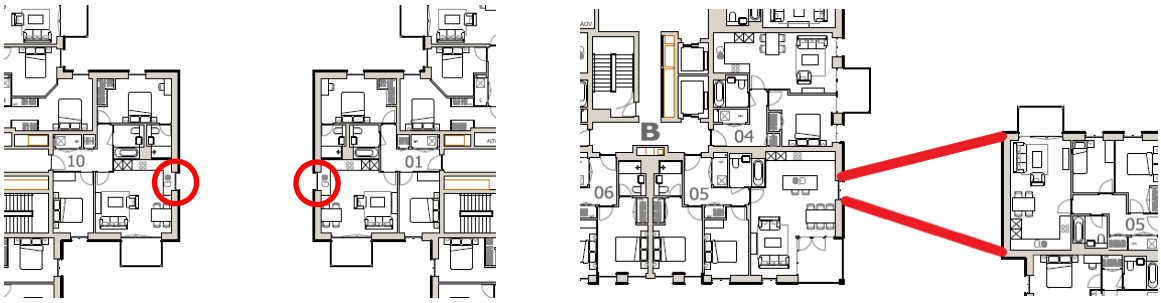


**Figure 9: Pinch-point Relationship Between Block D and C (left) and B and E (right)**

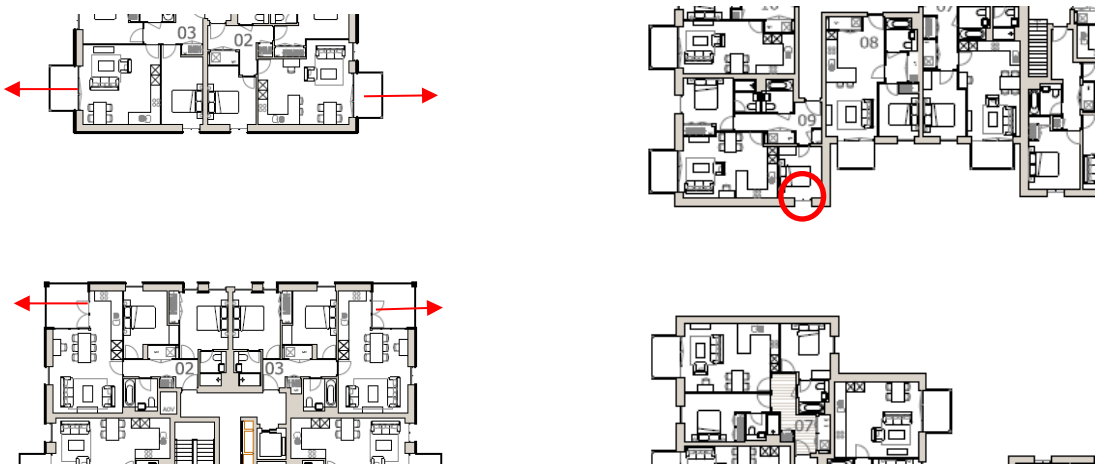


Figure 10: Pinch-point Relationship Between Block B and C (left) and Block D and E (right)

6.8.13. Whilst some of the pinch-point distances are relatively close, window / balcony positionings have been carefully considered to ensure privacy and outlook of future residents is acceptable. This is demonstrated clearly in Figures 9 and 10.

6.8.14. There are very few instances of inter-looking, however, where they do occur, they affect mainly smaller windows which serve secondary rooms (bedrooms, kitchens etc). Living rooms and balconies have been orientated to ensure the main aspect of each room is angled away from main living areas of other properties. Balcony screens can be utilised where necessary.

6.8.15. In terms of outlook, prospect and privacy considerations, the proposal is considered to be acceptable.

## 6.9. Noise

6.9.1. Emerging Policy DM22 – Pollution and SP3 – Healthy Communities of the Submission Draft Local Plan both consider noise impact. DM22 requires a noise assessment to be submitted with planning applications and SP3 requires that planning applications ensure that noise mitigation is utilised where necessary to reduce the impact of noise on occupiers.

6.9.2. The proposal is located adjacent to two noise sources

1) traffic noise associated with Lyndhurst Road to the north of the site and

2) noise associated with the Waitrose loading area to the west of the site.

6.9.3. The planning application is supported by a Noise Assessment which considers both of these noise sources. Broadly speaking, the noise assessment notes the potential impact on the site affecting the following three areas: Lyndhurst Road frontage (ground – second floor), facades which front onto the Waitrose unloading bay and Park Road (residual noise associated with Lyndhurst Road).

6.9.4. The Noise Assessment concluded as follows:

> *The assessment of the baseline noise climate has shown that providing the mitigation measures considered in this report are implemented, noise levels within the proposed residential apartments should meet the internal noise level criteria specified in ProPG and BS8233:2014.*

6.9.5. Mitigation measures, as set out within the Noise Assessment, include enhanced acoustic glazing to achieve sound reduction performance for properties fronting onto Lyndhurst Road, Park Road and the Waitrose unloading bay area. Assuming mitigation is provided, the report notes that the internal noise environment can be adequately mitigated.

6.9.6. Whilst elevated noise levels are experienced on the site, the noise assessment demonstrates that, with mitigation, all dwellings provide an adequate internal noise environment for future occupiers and is considered acceptable.

## 6.10. Overheating

6.10.1. Emerging Policy DM16 – Sustainable Design of the Submission Draft Local Plan considers overheating and states:

> *g) All new development should incorporate design measures where appropriate to minimise excessive solar gain and maximise opportunities for passive cooling through natural ventilation and other passive means to avoid contributing to the urban heat island effect and reduce vulnerability to overheating. Multifunctional green infrastructure should be integrated into public spaces to provide urban cooling and access to shady outdoor space.*
>
> *h) Major development proposals should reduce potential overheating and reliance on energy intensive air conditioning systems and demonstrate this in accordance with the cooling hierarchy.*

6.10.2. An Overheating Assessment was produced to accompany this application. It modelled a number of apartments considered to be most impacted by overheating. Assuming a natural ventilation environment (where windows for all properties could be opened) none of the units were considered to overheat.

6.10.3. However, due to the noise environment affecting parts of the scheme, scenarios where windows were closed (to mitigate external noise levels) were also modelled since closing windows would impact overheating.

6.10.4. This matter was discussed with the Council's Environmental Health Officer at a meeting on the 23rd June 2021. It was agreed that the context and character is that of a town centre location and that associated noise is part of that context. All apartments shall benefit from a Mechanical Ventilation and Heat Recovery unit to provide ventilation in situations where windows must remain closed and this was considered to be highly beneficial by the Environmental Health Officer

6.10.5. At this meeting, it was agreed that for the purposes of the Overheating Assessment, facades which were impacted by noise could be considered independently. These include:

- **Facades facing Waitrose Unloading Bay**
- **Facades facing Lyndhurst Road**
- **Facades facing Park Road**

6.10.6. For all other facades, the proposal was considered to be acceptable

### Waitrose Unloading Bay

6.10.7. With regards to facades facing the Waitrose unloading bay, the noise source is that associated with HGV deliveries to the loading / unloading bay. Noise associated with this use is temporary in nature as evidenced by a recent approved amendment to a condition restricting the hours of operation for the adjacent Waitrose delivery area (reference AWDM/1722/20).

6.10.8. The covering letter for this application was clear that there are no more than four HGV deliveries per day (lasting no longer than an hour each).

6.10.9. With regards to the facades facing Waitrose, it was agreed with the Environmental Health Officer that for the purposes of overheating, windows should be assumed to be closed for four one hour periods throughout the day (assuming that people may wish to close their windows during a temporary noisy period). For the rest of the time windows could be assumed to be opened.

**Lyndhurst Road**

6.10.10. For the Lyndhurst Road frontage, it was agreed with the Environmental Health Officer that for the purposes of overheating, windows that were most affected by road traffic noise (i.e. those that directly face north onto the road at ground through to second floors) would be assumed to be closed. Windows facing east / west (such as those serving bedrooms) could be considered to be opened given the reduced noise levels experienced. For dwellings set back from the frontage, windows could be assumed to be openable due to the lower noise impact affecting these windows.

**Park Road**

6.10.11. Noise levels were considered to be borderline with regards to the noise limit associated with assumptions for open windows for overheating purposes. As such, it was agreed that these windows could be assumed to be open for the Overheating Assessment.

6.10.12. The report states:

> *Sample North facing apartments have also been included to assess the impact of restricting the opening of windows facing Lyndhurst Road on the ground to second floor levels. The affected apartments are dual aspect, and it is possible to provide ventilation from windows on the less affected facades.*
>
> *Background ventilation will be provided in accordance with approved document Part F (approximately 0.4 air changes by MHVR).*
>
> *Mitigating measures include solar control glazing, incorporating a G value of 0.50 and enhanced insulation to limit any heat gain from the heating distribution pipework. The communal corridors will be ventilated using an environmental ventilation system to remove excess heat from the corridors via the smoke ventilation system.*
>
> *Low heating system operating temperatures along with additional insulation and optimised pipework selection will also reduce the unwanted heat emissions through the distribution network. This reduction will also be apparent on the pipework serving the heat interface units within the dwellings.*
>
> *Adopting the above measures and those detailed within the report illustrate that all sample apartments which includes those apartments at greatest risk of overheating are predicted to remain within acceptable temperature ranges as defined by CIBSE TM59 without any need for further overheating mitigation measures.*

6.10.13. The measures outlined within the report will be adopted ensuring that future occupiers of the property will not suffer from the effects of overheating.

## 6.11. Daylight / Sunlight

6.11.1. Policy DM 5 – Quality of the Built Environment of the Submission Draft Local Plan requires that new development should:

> *not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise or vehicular movements or loss of important open space;*

6.11.2. The planning application is supported by a Daylight / Sunlight Report which considers the daylight / sunlight impact to neighbouring properties and proposed properties as well as the overshadowing impact to neighbouring properties. The report notes:

> *The existing site is currently vacant following the demolition of the last remaining Gasholder structure in 2019. This was a large industrial structure which would have had a significant impact locally with regards to residential amenity (including impacts related to daylight and sunlight). The currently open site consequently presents unusually high levels of daylight / sunlight within the surrounding receptors. This is a very unusual position in the context of Worthing town centre which is characterised by a much a tighter urban grain, where properties typically receive lower levels of daylight / sunlight due to the form of the built environment.*

6.11.3. In consideration of daylight / sunlight matters, this context and the allocated nature of the site (for a significant level of development) must be taken into consideration in the assessment of the impact to surrounding residential properties.

#### Off-site Impacts to Daylight / Sunlight

6.11.4. With regards to daylight and sunlight impact to neighbouring properties, the report states:

> *It is important to reiterate that alterations in daylight and sunlight to adjoining properties are often inevitable when undertaking any meaningful development, especially in an urban environment. Therefore, the BRE guide is meant to be interpreted flexibly because natural lighting is only one of many factors in site layout design. Indeed, the guidelines suggest that different criteria may be used based upon the requirements for natural lighting in an area viewed against other constraints.*
>
> *The results of these tests have shown that, where reductions to individual windows occur, the amount of daylight retained will still be very high and considered as good given the sites allocation for development in the Local Plan. Where levels are lower, this is primarily due to self-constraining features, such as overhangs, of the receptors. These features limit the daylight potential of the adjoining windows and make them more susceptible to change.*

6.11.5. In terms of the overshadowing impact to neighbouring properties, the assessment shows that all amenity spaces will see little impact staying well in excess of BRE targets.

#### Daylight / Sunlight Considerations – Proposed Residential Dwellings

6.11.6. The report notes that daylight and sunlight within the vast majority of rooms within the proposed homes receive levels in excess of the relevant BRE targets (97% of the rooms meet the daylight criteria). These results are considered to be very good in daylight terms.

6.11.7. The results of the sunlight assessment showed that 55% of the south facing living rooms show compliances with BRE Guidelines. There are, therefore, 39 rooms, which do not meet the BRE criteria. All of these have windows located beneath external balconies which have been provided to ensure all residents have some form of external amenity space. It is challenging therefore for these rooms to achieve the BRE target levels of sunlight because they are obstructed by external balconies. The report however notes that: *It is likely that the direct sunlight to the vast majority of the balconies that serve these rooms will be very good.*

6.11.8. If balconies were to be removed, the results are clear that the majority of these rooms would meet the standards for light. These balconies provide much-needed private external amenity space.

6.11.9. Clearly the proposal will not have an *unacceptable impact* in daylight / sunlight / overshadowing terms and the results of the Daylight & Sunlight Report demonstrate that the proposal performs very well for a town centre site. The proposal is therefore compliant with emerging Policy DM5 of the Submission Draft Local Plan.

## 6.12. Archaeology

6.12.1. Emerging Policy DM23 – Strategic Approach to the Historic Environment and emerging Policy DM 24 – The Historic Environment requires the historic environment (including archaeological assets) to be conserved and enhanced.

6.12.2. An Archaeological Assessment supports this application and concludes:

> *Worthing Gasworks occupied the site from 1835 onwards and this involved the construction of gas holders in the north of the study site and demolition and construction of various buildings in the south of the study site. The construction and demolition of the gasworks has resulted in widespread and deep disturbance across most of the site. This will have destroyed any archaeological remans that may have once been present in all but the south western and south eastern parts of the site.*
>
> *In light of the widespread and deep disturbance from previous land uses, further archaeological investigations to support the planning application are unnecessary. Due to the site being located in fields to the east of the occupation area of Old Worthing, should archaeological remains survive in the less disturbed areas in the south western and south eastern parts of the site, they would only be agricultural and of limited archaeological interest. Consequently, further archaeological mitigation works are considered to be unnecessary.*

6.12.3. Subsequently, the proposal is considered to be acceptable with regards to Archaeological impact.

## 6.13. Contamination

6.13.1. Emerging policy DM22 – Pollution requires that investigations and assessment of all sites situated in or in close proximity to potentially contaminated land should be submitted with applications. Investigations should assess the nature and extent of contamination and the potential risks to human health, adjacent land uses and the local environment. Policy RES9 Contaminated Land of the Local Plan 2003 requires applicants to carry out investigations and remedial measures prior to development taking place.

6.13.2. The site was historically used as a gasworks from at least the 1830s until the demolition of the remaining gasworks structures by 2019.

6.13.3. In response to the policy requirements given the historic uses on and surrounding the site, a Staged Risk Based Approach to assessing the potential contamination impacts of the site has been undertaken.

6.13.4. The Environment Agency's Land Contamination Risk Management (LCRM) Guidance (Updated April 2021) sets out a staged risk based approach. There are 3 stages and each stage is broken down into tiers or steps as follows.

6.13.5. **Stage 1: Risk assessment (which entails the following):**

- Preliminary risk assessment.
- Generic quantitative risk assessment.
- Detailed quantitative risk assessment.

6.13.6. **Stage 2: Options appraisal (which entails the following):**

- Identify feasible remediation options.
- Do a detailed evaluation of options.
- Select the final remediation option.

6.13.7. **Stage 3: Remediation and verification (which entails the following):**

- Develop a remediation strategy.
- Remediate.
- Produce a verification report.
- Do long term monitoring and maintenance, if required.

6.13.8. A phase I Preliminary Risk Assessment (PRA) is included as part of this application. 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.

6.13.9. The PRA represents Tier 1 of Stage 1 of the approach. The PRA concludes:

> *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.*

6.13.10. Given the assessment of the PRA, it is considered likely that further discussions regarding contamination and emerging remediation strategy will be required with the Council during the determination of the planning application.

## 6.14. Ecology

6.14.1. Emerging policy DM18 – Biodiversity requires planning applications to be supported by relevant surveys and should ensure that development protects, conserves and enhances biodiversity. This policy also requires new development to provide a minimum 10% biodiversity net gain on site (with encouragement for a 20%+ net gain where possible). The Framework sets out that proposal should provide for a biodiversity net gain on development sites.

6.14.2. Policy 13 (The Natural Environment and Landscape Character) of the Core Strategy requires that all new development will respect the biodiversity and natural environment that surrounds the development and will contribute to the protection and, where applicable, the enhancement of the area. The Worthing Core Strategy is silent on Biodiversity Net Gain.

6.14.3. The planning application is supported by an Ecological Impact Assessment (EcIA) including an assessment of the Biodiversity Net Gain of the proposed development. The EcIA notes:

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

6.14.4. The EcIA also notes that no further phase 2 survey work is required prior to the submission of the application.

6.14.5. In terms of Biodiversity Net Gain, the scheme proposals will result in a significant betterment to the ecological value of the site by virtue of the landscaping scheme (refer to Landscaping Masterplan), brown roof provision and other ecological enhancements (such as bird and bat boxes). The EcIA 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.*

6.14.6. The proposal will lead to significant improvements with regards to biodiversity and ecology on site and is considered to go well beyond policy requirements. This is considered to be a significant benefit of the scheme.

## 6.15. Transport, Access and Parking

6.15.1. Policy DM15 of the Submission Draft Local Plan states:

> *In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a rebalancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported*

6.15.2. The policy seeks to direct development to sustainable locations with good sustainable transport options nearby. The policy also seeks to ensure that the design and layout of new development prioritises the needs of pedestrians and cyclists over car users.

6.15.3. New development will also be required to provide for an appropriate level of cycle, car parking and electric vehicle space allocations that takes into consideration the impact of development upon on-street parking and accords with WSCC standards / guidance whilst also promoting the provision of, and participation in, car club schemes.

6.15.4. Policy 19 of the Core Strategy states that Major new development will require the provision of a Transport Assessment / Travel Plan, which will specify how the development will affect the surrounding transport environment and how it can mitigate against any adverse effects.

6.15.5. The planning application is supported by a Transport Assessment and Travel Plan. These documents set out the sustainable transport strategy which is proposed for this site. In summary, the proposal has been designed to reduce reliance on the private motor car, to reduce the burdens on highway infrastructure and to reduce impacts in terms of noise and air quality (in accordance with the requirements of policy DM15).

6.15.6. The global pandemic has accelerated trends towards modal shifts in transport patterns which will potentially reduce the need for commuting in the future and in our view such changes will clearly reduce the need for many to own / use a car. Car ownership and usage in younger populations has been in decline in recent years. In our view such trends will only continue as flexible working patterns become more accepted and alternatives to car ownership (such as car club usage) increases.

6.15.7. High quality open spaces, play space and a residents' lounge provide opportunities for future residents to live, work, rest and play within the development reducing the need to travel. Furthermore, both local and national policy seek to reduce reliance on the private car for trips and journeys.

6.15.8. The Transport Assessment notes the highly sustainable town centre location of the site. Where residents do need to travel, the site is extremely well located to access shops, services and facilities by foot, bicycle or public transport (refer to the Transport Assessment for details). In this respect, the proposal is considered to be compliant with requirements of Policy DM 15 in directing development to the most sustainable locations.

6.15.9. In accordance with policy, the proposal has been designed around prioritising the needs of pedestrians, cyclists and users of public transport over the needs of the motorist. The key design features of the scheme in this respect are set out below:

- Widening of footpaths on Lyndhurst Road and Park Road (to be set out under a S278 agreement).
- Safeguarding of an area of land for the provision of a cycle path on Lyndhurst Road should this be required by WSCC in the future (currently shown on the landscape plan as an area of landscaped planting).
- Tying-in of land levels with the surrounding streets to ensure level and step free accesses on Lyndhurst and Park Roads (at significant cost to the developer given the constraints around contaminated land).
- The setting back of properties on Park Road and Lyndhurst roads combined with the removal of the oppressive boundary wall, tree planting and high-quality architecture to create a far more attractive and inviting walking / cycling environment.
- Significantly increased permeability through the site with a high-quality public realm will also encourage walking for future and existing residents providing options to move through what is currently a closed-off site.
- An ambition of the scheme is to allow a link through to the current Waitrose car park and the landscape design allows for such a connection to come forward in the future.
- Cycle parking over-provision (in relation to WSCC standards) to encourage sustainable modes of transport.

6.15.10. The measures listed above have been integral to the design development of the proposal from the outset.

6.15.11. Whilst the applicant has sought to reduce the need to travel by the private car as far as possible, car parking provision is nevertheless required to address planning policy and WSCC standards. Car parking provision was also a matter raised by local residents as a concern during the public consultation events.

6.15.12. As such, the scheme has sought to sensitively balance the need to ensure that a suitable level of parking is provided whilst not undermining the sustainable transport vision for the site.

6.15.13. The applicant has taken the approach to accommodate a low level of parking provision in accordance with the sustainable vision for the scheme. The proposal shall deliver parking at a ratio of 0.53 spaces per dwelling (110 spaces in total).

6.15.14. This lower parking provision is fully justified not only through the sustainable transport strategy approach referred to but also through other incentives and restrictions to promote alternatives to car ownership as follows:

- Restricting residents from parking within the local Controlled Parking Zones: Such a measure can be secured through a S106 legal agreement. In restricting the ability of future residents to park on the street locally, the scheme shall ensure the existing parking situation is not worsened and reduce the likelihood of car ownership amongst residents.

- Provision of alternative means of car use: In this respect the proposal includes two car club spaces (equivalent to a 10 – 15% reduction in car parking spaces each) which is a significant benefit of the scheme.

6.15.15. Notwithstanding this position, as set out within the Transport Assessment, the level of parking is similar to other recently approved development sites (Union Place with a parking ratio of 0.38 and Teville Gate with a parking ratio of 0.51).

6.15.16. The parking spaces that are to be provided will include a high proportion of Electric Vehicle Charging points. The Transport Assessment states:

> *It is anticipated that the development will commence in 2022, at which time the standards require 37% of spaces to have EVCPs, with the remainder being passive electric spaces. The development proposal includes 40% spaces with EVCPs, with the remainder being passive electric spaces. Therefore the provision is in excess of standards.*

6.15.17. In summary, the proposal is considered to represent a highly sustainable form of development with regards to transport considerations. The applicant has demonstrated a commitment to ensuring that low car ownership is realised on this site whilst also seeking to prioritise the needs of pedestrians, cyclists and public transport users.

6.15.18. With regards to technical highway matters, the access and internal road layout and parking arrangement has been fully tracked and is considered acceptable (refer to the Transport Assessment). A Road Safety Audit has also been submitted (refer to the Transport Assessment) which demonstrates that the scheme is acceptable from a Highways Safety point of view.

6.15.19. In terms of traffic impact, the Transport Assessment states:

> *A trip generation assessment has been undertaken which demonstrates that the trip generation associated with the proposed development will not have a negative impact on the surrounding network. In addition, a high proportion of trips will be undertaken utilising sustainable modes of transport. As such, WSCC determined that no off-site junction capacity assessments are considered necessary. However, for completeness, a junction capacity assessment has been undertaken at the Site access with Park Road. The results have demonstrated that the junction will operate well below capacity.*

6.15.20. The proposal is considered acceptable in highways terms, complying with the requirements of policy DM15.

## 6.16. Air Quality

6.16.1. Policy 17 – Sustainable Construction of the Worthing Core Strategy is of relevance to air quality, stating all new development will be required to demonstrate how the development addresses pollution amongst other matters.

6.16.2. Policy DM22 - Pollution of the Submission Draft Worthing Local Plan (2021) requires that development shall not result in pollution or hazards which prejudice the health and safety of the local community and the environment. The policy also seeks to direct new development in areas *most suitable to the use of that development to avoid risks from all sources of pollution. Mitigation measures will need to be implemented for developments that could increase levels of pollution, taking into account any cumulative impact. Mitigation should avoid, minimise and offset the impact of development and take opportunities to improve local environmental conditions. Where there are significant levels of increased pollution that cannot be mitigated development will be refused.*

6.16.3. The application is supported by an Air Quality Assessment. With regards to future occupiers, the report concludes that existing pollution concentrations are likely be below the relevant UK Air Quality Strategy standard concentrations. During the construction phase, assuming appropriate mitigation measures are adopted as set out within the assessment, it is anticipated that no significant air quality effects on the surrounding area will occur. The proposed development is not expected to introduce new receptors into an area of existing poor air quality, nor is it anticipated to significantly impact local air quality. In this respect, the proposal is considered to be compliant with Core Strategy and Submission Draft Local Plan Policy.

6.16.4. As the proposed development is classified as 'Major', an emissions cost calculation must be undertaken to ascertain whether any contributions would be necessary to mitigate the impacts of development.

6.16.5. The total damage costs are summarised as follows:

| | |
|---|---|
| NOX emission 'damage' (cost, £) = | £5,735 + |
| PM2.5 emission 'damage' (cost, £) = | £6,302 |
| **TOTAL (cost, £) =** | **£12,037** |

6.16.6. The proposed development however includes the following mitigation measures (refer to the Air Quality Assessment for a more comprehensive list), the costs of which would far exceed the 'damage' costs identified above:

- *A Travel Plan, outlining methods to encourage active and sustainable travel and discourage private vehicle use;*
- *The provision of, or financial support to, a car club, with 2 associated on-site parking spaces (both with EV charging infrastructure);*
- *Consideration is being given to the provision of public transport vouchers to new residents, to encourage the use of more sustainable transport modes;*
- *Cycle storage infrastructure is to be provided above and beyond WSCC's requirements, with 205 no. parking spaces proposed, to encourage active and sustainable travel;*
- *New pedestrian connections through the site for new and existing residents; and*
- *"Cable to Property" broadband provision, alongside residential lounge space, to enable working from home.*

6.16.7. In all respects the proposal is considered to be acceptable from an air quality perspective.

## 6.17. Sustainability

6.17.1. Emerging policy DM16 'Sustainable Design' of the Submission Draft Worthing Local Plan seeks to move towards zero carbon development, with all new build housing achieving a 31% reduction in CO2 based on the 2013 Edition of the 2010 Building Regulations (Part L). All major developments need to demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions in line with the energy hierarchy.

6.17.2. An Energy Statement supports the application which states:

> *The energy efficiency measures include: good fabric insulation, high quality glazing, improved air tightness, high efficiency balanced whole house heat recovery units, and LED lighting throughout, resulting in a 9% reduction in CO2 emissions. Non residential spaces will be fitted out with low energy light fittings with photocell controls where possible and energy efficient ventilation systems.*
>
> *The site is located close to a proposed district heating network, and will be designed to accommodate connection at an appropriate time in the future.*
>
> *The air source heat pumps serving the dwellings will act as the lead heat source for the community heating system predicted to generate 61.5% of the annual heat demand, reducing the emissions by 66 tonnes from the baseline development.*
>
> *The total reduction of regulated emissions, once energy efficiency measures and renewable energy is considered is predicted to be 32% based on NCM building performance. The proposed development is considered to comply with emerging policy and is considered to be acceptable in this respect.*

6.17.3. The proposal is considered to represent a highly sustainable form of development in accordance with emerging policy. Whilst meeting the requirements of existing policy this goes substantially beyond the requirements of the adopted Core Strategy and must be considered as a significant benefit of the scheme.

## 6.18. Microclimate and Wind

6.18.1. A wind report has been submitted with this planning application at the request of Planning Officers. It demonstrates that the application is acceptable in residential amenity terms and will not create an unacceptable environment for existing / future residents or members of the public passing through the site. The report concludes:

> *For all wind directions, including the prevailing southwesterly direction, the wind microclimate in all public areas around the proposed development is expected to be suitable for the intended pedestrian activities at entrances, all ground level locations on footpaths, public realm areas and adjoining surrounding areas.*
>
> *The wind conditions on the private residential gardens along the western elevation of Block C are likely to be unsuitable for long-term sitting when the wind is blowing from westerly directions. For other wind directions these gardens will be more sheltered and are expected to be suitable for long-term sitting during the summer months.*
>
> *The proposed development is not expected to generate any unpleasant wind conditions around the Site or around surrounding nearby existing buildings or public realm areas and the distress criteria are not expected to be exceeded.*

6.18.2. The proposal is considered to be acceptable in relation to wind and microclimate impacts.

## 6.19. Flood Risk, Water and Drainage

6.19.1. Emerging Policy DM 20 Flood Risk and Sustainable Drainage sets out detailed requirements with regards to surface water drainage. The recent modifications to the Local Plan have proposed amendments to this policy which provide flexibility to meeting the detailed requirements. The policy now reads:

*The surface water drainage scheme should use Sustainable Drainage Systems **and where practicable and viable** be designed to:*

*i) limit runoff to greenfield 1 year rates for events up to and including the 100 year plus climate change event where possible, and always ensure no increase in flows as a result of development;*

*ii) follow natural drainage flow paths and work with existing site topography;*

*iii) provide adequate capacity for the 30 year plus climate change event to be contained within the drainage system, and demonstrate that the development is safe for the 100 year plus climate change event scenario and does not increase in flood risk off site;*

*iv) incorporate green infrastructure and maximise multi-functional benefits ensuring adequate treatment of surface water prior to discharge to ensure that the quality of local water is not adversely affected;*

*v) be sensitively located and designed to promote an enhanced landscape/ townscape and good quality spaces that improve public amenity;*

vi) *discharge run-off according to the following hierarchy: (1) into the ground (infiltration), (2) to a surface water body, (3) to a surface water sewer, (4) to a combined sewer. Surface water connections to the public sewerage network should only be made with prior agreement of the relevant sewerage undertaker and where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users.*

6.19.2. The NPPG on drainage refers to technical standards which should guide the design of drainage. The NPPG is also clear that viability must be considered as part of the design process for drainage matters as follows:

> ***Are the Department for Environment, Food and Rural Affairs' technical standards for sustainable drainage systems mandatory?***
>
> *The technical standards provided by government relate to the design, construction, operation and maintenance of sustainable drainage systems and have been published as guidance for those designing schemes.* ***In terms of the overall viability of a proposed development, expecting compliance with the technical standards is unlikely to be reasonably practicable if more expensive than complying with building regulations*** *– provided that where there is a risk of flooding the development will be safe and flood risk is not increased elsewhere. Similarly, a particular discharge route would not normally be reasonable practicable when an alternative would cost less to design and construct.*
>
> *Paragraph: 083 Reference ID: 7-083-20150323*

6.19.3. Given such flexibility, the report states:

> *…a challenging viability case means that restriction to greenfield rates is not viable for this site. A flow rate of 10l/s is proposed as a sensible compromise that would provide a minimum flow reduction from the current 1 in 1 year brownfield rate of 70%. This offers a significant betterment compared to the minimum 50% reduction in Brownfield runoff rate as required in WSCC's SPD. There would be a higher flow rate from the existing site (if no development were to take place) as the existing system would not cope with peak flash storms. This is shown in the Micro Drainage calculations as surcharge flooding in the existing network / topography - resulting in water flowing eastwards into the road.*

6.19.4. Whilst infiltration for drainage was not considered feasible a drainage strategy is proposed to connect to both the public foul and surface water sewer network following the SuDS Hierarchy. The proposal will provide a minimum 70% reduction in flows off the site in the 1 in 1 year event and significantly higher reduction in the 1 in 30 and 1 in 100 year events (restricted to 10l/s in the critical storm event).

6.19.5. The site is located Flood Zone 1 and the overall flood risk profile is Low. The proposal will lead to a highly beneficial improvement in drainage terms over the existing situation. Subsequently the proposal shall lead to a significant improvement in surface water drainage terms in comparison to the existing situation and in this regards should be considered positively.

## 6.20. Affordable Housing Provision and Viability

6.20.1. The Core Strategy requires 30% affordable housing delivery on all sites of 15 or more dwellings subject to the *economics of providing affordable housing* amongst other exclusions.

6.20.2. Emerging Policy DM 3 – Affordable Housing sets out requirements for new developments with regards to on and offsite provision for affordable housing. This policy is supported by the Strategic Viability Assessment (Jan 2021) prepared by Dixon Searle Partnership (DSP) which supports the Submission Draft Local Plan and which correctly identifies urban brownfield sites as being the most challenging sites with regards to viability. The DSP report considers the Gasworks site and acknowledged the 'challenging viability prospects' of the site.

6.20.3. For developments of 10 or more dwellings, policy DM3 requires (for sites on previously developed land involving the development of flats) that 20% affordable housing be provided. This should be delivered onsite and only in exceptional circumstances should a contribution be offered in lieu of this provision.

6.20.4. The policy also states:

> *Where a developer states that exceptional development costs mean it is not possible to meet the full requirements for the delivery of affordable housing the onus will be on them to demonstrate this to the Council and this must be supported by robust financial viability evidence (through an open book approach).*

6.20.5. In this instance, the financial viability of the scheme is challenging to an extent that affordable provision cannot be delivered. A viability assessment has been prepared by St William which demonstrates this and states:

> *This report shows that the proposed scheme is unable to deliver any affordable housing, principally due to the abnormal costs associated with bringing forward development on a former gasworks, including of remediating the contaminated land as well as meeting emerging Local Plan policies on sustainability and the new Part L of the Building Regulations.*

6.20.6. The report furthermore concludes:

> *The residual margin is currently just £47,000 or 0.07% of GDV. This is a deficit of £12.96m to the allowable Developer Margin of 20% of GDV. To put this in to context, total revenue (GDV) would need to increase in excess of £78m in order to make the delivery of any affordable homes on the site viable.*
>
> *The Strategic Viability Assessment (Jan 2021) highlighted the potential issue of development viability for higher density flatted schemes coming forward on previously developed land. As such, affordable housing delivery could be impacted. This is the case here.*
>
> *Despite this considerable deficit, St William is prepared to take the commercial risk that its brand and placemaking skills, coupled with the assumption of significant market growth as the country emerges from the current pandemic and the uncertainties of Brexit, will help achieve an acceptable margin. It is only able to do this as a result of the joint venture arrangements between Berkeley Group and National Grid and this therefore represents a unique opportunity to secure the delivery of much needed housing and other planning contributions on this site.*

6.20.7. Given the exceptional circumstances due to the significant abnormal costs associated with the development of the site it is considered that Submission Draft Local Plan and Core Strategy Policy requirements have been demonstrably met.

## 6.21. S106 & Community Infrastructure Levy

6.21.1. Worthing Borough Council is in the process of adopting a new Community Infrastructure Levy Charging Schedule (CIL) for Worthing. We understand that this shall be adopted as of 1 August 2021. Once adopted, a CIL rate for flatted development of more than 10 dwellings on brownfield sites will apply at £25 per sqm. This amount has been factored into the viability assessment and will be payable on chargeable floor area.

6.21.2. The following calculation details the Gross Internal Area of the existing properties on the site. The existing floorspace of these properties can be applied as a discount against the CIL liable new floorspace being created as part of the development assuming the properties have been in use for a continuous period of at least six months within the past thirty six months (we can confirm that all three properties meet this requirement).

| | |
|---|---|
| Warehouse to West of Link House | 537sqm GIA |
| Link House | 511sqm GIA |
| Depot Building adjacent Park Road | 130sqm GIA |
| **Total** | **1,178sqm GIA** |

6.21.3. The proposal will result in **17,880sqm GIA** new internal floorspace.

6.21.4. Subsequently, CIL is liable on **16,702sqm** floorspace. At £25 per sqm a total CIL amount of **£417,550** is payable on this scheme. Please refer to CIL form 1 which accompanies this planning application.

6.21.5. In addition, it is likely that a S106 payment will be requested by the Council and it is considered likely that the proposal shall contribute towards the following elements to ensure the scheme is acceptable in planning terms:

- Sustainable Transport Contributions;
- Off-Site Sports, Recreation and Open Space Contributions;

6.21.6. As discussed within this statement, the proposal includes an area of land which has been sterilised due to the need for it to be reserved for potential cycle infrastructure (on Lyndhurst Road). Taking the Benchmark Land Value (BLV) from the viability assessment which accompanies this application, it is possible to broadly calculate the cost to the developer of extinguishing the land from forming part of the developable area of the site. The calculation is as follows:

$$\frac{227\ m^2\ \text{(area for cycle land + pavement)}}{11237\ m^2\ \text{(total site area)}} \times £2.77m\ (BLV) = £56k$$

6.21.7. Whilst this is relatively crude calculation it demonstrates that land value that has been ceded as part of the development and must be considered as an additional contribution (in kind).

# 7. Conclusions

7.1. This Planning Statement has been produced on behalf of **St William Homes LLP** in support of their full planning application for the redevelopment of Land at the Former Gasworks Site, Park Road, Worthing, West Sussex. The development description for the proposal reads:

> *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*

7.2. The proposal seeks to redevelop a former gasworks site to provide for much needed housing within a highly sustainable, town centre location. The development will make the best possible use of a sustainably located, town centre, brownfield site that is allocated for residential development within the Worthing Core Strategy 2011 and the Submission Draft Local Plan 2021.

7.3. The views expressed in this Statement and the contents of the application have been informed by extensive pre-application discussions with Worthing Borough Council and West Sussex County Council. The proposals have also been taken to two Design Review Panels, a Pre-Application presentation to the Major Project Board, and have been the subject of three rounds of public consultation.

7.4. The site is a disused brownfield site located within a highly sustainable town centre location where redevelopment for residential use is supported by emerging policy. The proposed development is considered to be acceptable in principle. The Council cannot demonstrate a five year housing land supply and is currently failing with regards to the Housing Delivery Test. In this respect the proposal will significantly assist with meeting local housing needs.

7.5. The proposal will provide for a mix of property sizes, focussing on smaller dwellings appropriate to the town centre location with provision included for family sized dwellings. The vast majority of properties are accessible and adaptable meeting M4(2) standards. The scheme has been designed to allow for mixed communities.

7.6. The scheme is of a high architectural quality, respectful of local character, townscape and heritage considerations. The proposal has been positively assessed by an independent Design Review Panel and the application has been assessed through a Heritage Statement and Townscape Visual Impact Assessment, both of which found minimal harm (and with regards to Townscape beneficial improvements). The minimal harm in heritage terms is considered to be outweighed by the significant benefits of the scheme as follows:

> **New Homes** – 209 homes is a significant contribution towards local housing delivery in the context of an authority that is failing in this respect (only 54% of 'required homes' delivered over the past three years with regards to HDT).
>
> **Public Realm** – significant improvements to the street scenes of both Park Road and Lyndhurst Road in 'repairing' the street. Improved pedestrian facilities and safeguarded land for cycling infrastructure.
>
> **Permeability** – access through what is currently a closed off site. The public realm within the site is considered to be of an exceptional quality.
>
> **Remediation of Contaminated Land**

**Development of a Sustainably Located Brownfield Site** – this is attributed significant weight in the Framework as set out within this Statement.

**Biodiversity Net Gain** – the proposal will lead to a significant increase in biodiversity on site through new planting, brown roofs and other ecological enhancement measures. The biodiversity net gain is well in excess of the 10% target quoted in emerging policy.

**High Quality Architecture** – improving the quality of the built realm locally.

**Sustainable Form of Development** – the proposal is considered to be highly sustainable in terms of its location and energy strategy. The sustainable transport strategy seeks to prioritise active travel and reduce reliance on the private motor car.

**Economic Benefits** – the proposal will have a number of economic benefits including:

- Increased residential population within the town centre of Worthing, increasing footfall and spending in shops, restaurants and facilities within the town centre.
- The development would represent a significant investment in the economy. St William has had initial discussions with the Economic Development Team at Worthing Borough Council to discuss local employment opportunities.
- Regeneration of the local area improving the quality of the built form and public realm. This has a reputational benefit to the town of Worthing more generally and a local benefit in terms of developing an under-utilised and cut-off site.
- Enabling wider growth and regeneration of Worthing through increasing the supply of housing, which is essential to ensure the economic growth and vitality of an area.
- Providing a significant Community Infrastructure Levy payment to improve the local social, physical and environmental infrastructure of the local area.

7.7. The proposal has been considered with regards to residential amenity, noise, daylight and sunlight and air quality. The proposal is considered to be acceptable in these terms.

7.7.1. A phase I Preliminary Risk Assessment (PRA) is included as part of this application. Given the assessment of the PRA, it is considered likely that further discussions regarding contamination will be required with the Council during the determination of the planning application.

7.8. With regards to ecology the scheme has been thoughtfully designed to ensure a significant biodiversity net gain on site through additional tree and hedge planting, brown roofs and bird and bat boxes amongst other features.

7.9. The proposal will lead to beneficial improvements from a highways and sustainable transport point of view through enhanced public realm and street scene improvements alongside greater permeability through what is currently a closed off site. The proposal will allow for a modal shift towards more sustainable forms of travel providing for cycle storage, EVCPs and car clubs. The proposal has been fully considered from a highways point of view and is considered to be appropriate.

7.10. In all other respects the proposal is considered to be acceptable and we respectfully request that planning permission is granted.

# Appendix A - Environmental Impact Assessment Screening Opinion 18th December 2020

ADUR & WORTHING
COUNCILS

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Mr Chris Barker
ECE Planning
Brooklyn Chambers
11 Goring Road
Worthing
West Sussex
BN14 4AP

**Date:** 11th December 2020

**Service:** Development Management

**Tel:** 01903 221065
planning@adur-worthing.gov.uk

Dear Mr Barker

**LOCAL PLANNING AUTHORITY SCREENING OPINION - THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017 (AS AMENDED) IN CONNECTION WITH THE PROPOSED RESIDENTIAL DEVELOPMENT OF FORMER GASWORKS SITE, WORTHING**

Further to your screening request in respect the above mentioned development site, I have considered the proposal in respect of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. I can confirm for the reasons set out below that an Environmental Impact Assessment (EIA) is not required in support of the proposed development.

**Approach adopted to inform the Screening Opinion**

The Regulations require Environmental Impact Assessment procedures to apply to all applications for Environmental Impact Assessment development which is defined by Regulation 2(1) as meaning development which is:

1. Schedule 1 development or;

2. Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Development of a type listed in the left hand column of Schedule 2 is Schedule 2 development only if:

a). it is located wholly or partly in a sensitive area (defined in Reg. 2 as including areas like SSSIs, National Parks, AONBs, Scheduled Monuments, World Heritage Sites and European Sites; or
b). any applicable threshold or criterion in the second column is respectively exceeded or met in relation to the development.

3. Changes or extension to Schedule 1 or Schedule 2 development which may have significant adverse impacts on the environment. If the change or extension itself constitutes Schedule 1

development then assessment is always required; otherwise, it counts as Schedule 2 development.

The proposal is not a Schedule 1 development because it is not one of the projects listed in this Schedule 1.

**Does the development fall within Schedule 2 and if it does, does the development meet the relevant criteria in Column 2 of Schedule 2?**

It is however, in the Local Planning Authority's opinion, a Schedule 2 Development as it would exceed the threshold under part (ii) given more than 150 dwellings are proposed.

The Regulations are clear to emphasise that projects which qualify to be within the list in Schedule 2 require an Environmental Impact Assessment only where they are likely to have significant environmental effects by reason of their nature, size and location. The key test in this regard is not only about the size of the development but more fundamentally, the significance of the impacts of the proposal on the environment.

**Is the development likely to have significant effects on the environment?**

Schedule 3 of the EIA Regulations provides a selection criteria for screening Schedule 2 development which falls into 3 broad categories; 1) Characteristics of development, 2) Location of development and 3) Characteristics of the potential impact.

Whilst it is accepted that the proposal is a Schedule 2 development by reason of the number of residential dwellings proposed, the LPA does not consider that it is likely to have significant environmental effects when assessed against the criteria detailed in Schedule 3. The LPA believes that the information submitted as part of planning application would be sufficient to assess the nature and extent of the developments impact when considered in the context of neighbouring development.

The Regulations require a Planning Authority to give full reasons when issuing a negative screening opinion. In respect of Schedule 3 (Selection Criteria for Screening Schedule 2 Development) the Local Planning Authority has assessed the proposed development against all the following criteria:

**1. Characteristics of Development**

a) The LPA has given full regard to the size of the development, its key features and potential impacts particularly in relation to landscape and visual impact, the setting of heritage assets and traffic generation when assessed in the context of the current uses of the site, and local context. The proposed residential development would not have a significant impact on the local environment.

b) The cumulative impact with other development. The LPA has assessed the proposal in relation to other developments that have been granted planning permission nearby and considers that the cumulative impact of the proposal would not have a significant environmental impact. Whilst, there has been a resolution to grant planning permission for a

mixed use development at Teville Gate the s106 agreement was not signed for this development and the site is currently been sold.

c) the use of natural resources d) the production of waste, pollution and nuisances and e) the risk of accidents, having regard in particular to substances or technologies used. The LPA considers that the proposal, when considered in association with nearby development and the resultant cumulative impact would not give rise to such significant environmental effects that can only be assessed by the submission of an Environmental Impact Assessment.

Give the site and scale of the development, the impacts would be local in character and not of any regional or national significance. Nor would there be any significant implications for resource consumption, waste production, pollution or risk of accidents.

The LPA consider that the characteristics of the development when considered in association with any nearby development are not likely to have such significant cumulative environmental effects that can only be assessed by the submission of an Environmental Impact Assessment.

**2. Location of development**

The Local Planning Authority has given full regard to the key contextual information within the site. The LPA has assessed the environmental sensitivity of the area likely to be affected by development in particular to (a) the existing land use; (b) the relative abundance, quality and regenerative capacity of natural resources in the area and (c) the absorption capacity of the natural environment with particular respect to the areas listed under points (i)-(viii) under Schedule 3 and have concluded that that the cumulative effects of the proposal any nearby development especially in relation to traffic generation and impact on the character of the landscape and visual amenity, are not sufficient to require the submission of an Environmental Impact Assessment.

In reaching this decision the Local Planning Authority has given full consideration of the development's likelihood to have significant environmental effects. It is therefore necessary to consider whether the works would be located in a 'sensitive area' as defined in the Regulations. The Regulations define sensitive areas as:

- Sites of Special Scientific Interest (including their consultation areas)
- Land to which Nature Conservation Orders apply
- International conservation sites
- National Parks
- Areas of Outstanding Natural Beauty
- World Heritage Sites
- Scheduled Monuments

The Local Planning Authority acknowledges that the application site does not lie within a sensitive area as defined in the Regulations.

It is recognised that views of the proposal would be available from the South Downs National Park. However, at the height of development proposed and in the context of the development being seen against the backdrop of the town centre it is not considered that the development

would affect the setting of the National Park. It should be noted that at a height above 11 storeys there is likely to be a requirement for additional visual impact assessment from key viewpoints from the National Park.

The proposal would also be within the setting of a Conservation Area and other heritage assets, however, it is not considered there would be significant adverse environmental effects which would trigger a requirement for an Environmental Impact assessment. The effects can be assessed within the context of the information submitted in support of the planning application described further below under 'supporting technical reports'.

**3. Characteristics of the potential impact**

The Local Planning Authority has also considered the potential significant effects of development in relation to the criteria set out under points 1 and 2 above having particular regard to the extent of the impact (geographical area and size of the affected population); the transfrontier nature of the impact; the magnitude and complexity of the impact; the probability of the impact; and duration, frequency and reversibility of the impact and have concluded that that the cumulative effects taking into account nearby development are not sufficient to require the submission of a Environmental Impact Assessment. The impact/effects can be assessed within the context of the information submitted in support of the planning application described further below.

**Supporting Technical Reports**

As set out in your screening request letter, the Local Planning Authority recommend the application is supported by relevant technical reports to assess and mitigate (where necessary) the environmental effects associated with the development. The reports should include:

- Landscape/Townscape Visual Impact Assessment (LVIA)
- Heritage / Archaeological Assessment
- Tall Buildings Assessment
- Design and Access Statement
- Noise Environment
- Air Quality Assessment
- Ecological Surveys
- Flood Risk Assessment / Foul and Surface Water Drainage Assessment
- Landscape Design Strategy
- Daylight, Sunlight and Overshadowing Assessment
- Micro-climate Assessment (depending on final layout and height of development).
- Energy/Sustainability Statement
- Transport Assessment and Travel Plan
- Contaminated Land Statement / Ground Investigation.
- Viability Assessment

**Conclusion**

Based on the above, whilst it is accepted that the proposal is Schedule 2 development by reason of the number of residential dwellings proposed, however, it is not considered likely to have significant effects on the environment taking into account the cumulative impact with nearby development within Worthing when assessed against the criteria in Schedule 3. As such the Local Planning Authority does not consider that an Environmental Impact Assessment is required in support of the proposed development.

Yours sincerely

[redacted]

Jay Singh
Senior Planning Officer (Major Applications)

# Appendix B – Pre Application Responses (Chronologically Ordered)

ADUR & WORTHING
COUNCILS

Planning and Development

Mr Chris Barker
ECE Planning
Brooklyn Chambers
11 Goring Road
Worthing
West Sussex BN14 4AP

Our Ref: JA/lja
Your Ref: 18th December 2020

Dear Mr Barker,

**PRE APPLICATION ADVICE – REF PREAPP/0680/20 - PROPOSED RESIDENTIAL REDEVELOPMENT OF THE FORMER GASWORKS SITE, WORTHING**

Further to your pre-application enquiry and your latest revised plans of the 30th November 2020, please see enclosed our response to your proposed development following the review by the Coastal Design Panel. The Councils screening opinion, key view plan and draft Planning Performance Agreement (PPA) have been provided via separate cover.

Pre-application advice

This response comprises a preliminary assessment of the planning merits of the proposal (including relevant planning policies), identifying the key issues likely to be raised by the proposal and list of documentation that would be required in support of any formal application for planning permission taking into account the Councils validation requirements.

Please note that this does not include any views of external consultees such as the Highway Authority, Historic England and the Environment Agency, whose views will also be important. I note that you have engaged with West Sussex as the Highway Authority and I would suggest that you also contact Historic England at the appropriate time to seek pre-application advice. I have, however, attached HE's advice in relation to the Union Place which may well be worth reviewing in relation to your emerging proposals.

Please also note that these preliminary comments are made at Officer level only, based on the professional judgement of Officers and the information that has been provided at this stage. These comments are made without prejudice to any future comments, discussions, submissions or decisions and it does not prejudge Planning Committees final decision on any application subsequently submitted.

## Key Matters

- Planning Policy context;
- Constraints/designations;
- Principle of development;
- Impact on the character and appearance of the area including design and form;
- Historic environment;
- Impact on the South Downs National Park (SDNP)
- Highways matters;
- Contamination and viability;
- Drainage and flooding;
- Residential amenity;
- Sustainability;
- Ecology;
- Infrastructure and services/planning obligations;
- Planning validation requirements; and
- Resourcing.

## Determining the planning application

Most applications are determined by planning officers under 'delegated powers, however, 'major' applications such as this proposal, they will be determined by Planning Committee. When the application is reported to Committee, you will be notified and given full details of the arrangements, including an opportunity to make representations direct to the committee. For large scale developments the public speaking arrangements are extended to 5 minutes per speaker (3 for and 3 against).

We have discussed the benefits of early engagement with Councillors and we have arranged for a presentation to the Major Projects Board in January and I would suggest a presentation to the Planning Committee prior to the submission of the application. The level of Councillor Involvement was disappointing at the recent consultation event and I would recommend a briefing to the local Members and the MP prior to submission. It is relevant to note that Covid cancelled the May 2019 elections and therefore next May's elections will see an unusual situation for Worthing with 2/3rds of the Council seeking re-election. Given the scale of development this will mean that it is unlikely the application would be considered into June of July.

## Planning Policy Context

Planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

The documents that comprise the statutory development plan are set out below, together with a list of their relevant policies.

**Worthing Core Strategy (2011)**
Policy 2: Areas of Change
Policy Area of Change 7:- British Gas Site
Policy 3: Providing for a Diverse and Sustainable Economy
Policy 7: Meeting Housing Need
Policy 8: Getting the Right Mix of Homes

Policy 10: Affordable Housing
Policy 12: New Infrastructure
Policy 13: The Natural Environment and Landscape Character
Policy 14: Green Infrastructure
Policy 15: Flood Risk and Sustainable Water Management
Policy 16: Built Environment and Design
Policy 17: Sustainable Construction
Policy 18: Sustainable Energy
Policy 19: Sustainable Travel

The application site is identified under policy Area of Change 7 which identifies it for residential led development. Key development principles relate to establishing a suitable point (or points) of access either off Lyndhurst Road or Park Road. Other issues to be considered are parking, traffic generation and complimentary land uses Potential contamination issues will require further investigation and appropriate mitigation measures. The Local Plan requires 30% affordable unless it can be demonstrated that viability would prevent this being delivered on site. The site is included in the town centre boundary.

**Saved Local Plan policies (WBC 2003):**

BE25: Development within an Environmental Area of Special Character
CT3: Protection and Enhancement of the Seafront Area
H18: Residential Amenity
LR8: Provision of Play Space/Outdoor Recreation Space in Housing.
RES7: Control of Polluting Development
RES9: Contaminated Land
TR9: Parking Requirements for Development

**Relevant Local Supplementary Documents and other Guidance**
National Planning Policy Framework (2019)
National Planning Practise Guidance
National Space Standards (2015)
Warwick Gardens Conservation Area Appraisal (2009)
Space Standards SPD (2012)
Guide to Residential Development SPD (2013)
Tall Building Guidance SPD (2013).
Worthing Evolution: Town Centre and Seafront Masterplan (2006)
Developer Contributions SPD (2012)

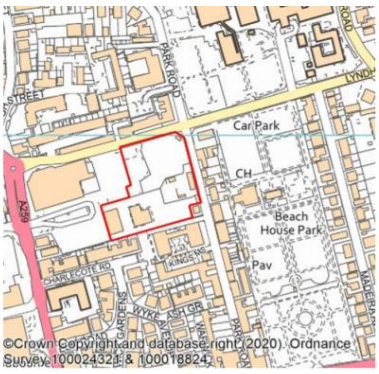
<u>Emerging Local Plan</u>

As the Core Strategy pre-dates the NPPF, NPPG, and the Localism Act (and the subsequent withdrawal of the South East Plan), you will be aware that the Council has embarked on a review of the Core Strategy and is preparing a new Local Plan. The Pre-Submission Plan was recently approved by Full Council on the 15th December 2020 and is due to be published early in the New Year 26th January). It is anticipated that an Examination in Public would be considered next summer with the Plan hopefully adopted by the end of next year.

Whilst the policies of the plan cannot be afforded significant weight at this stage, as the plan advances, the policies will be begin to carry more weight. Policy SS2 of the emerging local plan allocates the application site as an opportunity to redevelop the site for approximately 150 dwellings. The policy extract is provided below which sets out the Councils emerging requirements for the site:

## **A9** Lyndhurst Road

| | | | |
|---|---|---|---|
| **Ward** | Central | **Indicative Capacity** | 150 residential units |
| **Site Area** | 1.13 ha | **Current Land Uses(s)** | Former gasholder/ depot buildings /NHS car park |
| **Expected Delivery** | 6+ years | | |




**Site Description**

4.28 This previously developed site located to the north east of Worthing town centre. It comprises a cleared site (formerly a gasholder), depot buildings and a temporary NHS car park for the nearby Worthing Hospital. The site is bounded by residential properties to the south, a supermarket to the west, Lyndhurst Road to the north and Park Road to the east. Worthing Hospital lies to the north-east of the site. Current access to the site is via Park Street.

4.29 There has been a long-term aspiration to develop this site. Subject to addressing the contamination issues, the site presents an opportunity for high quality residential within a highly sustainable location.

**Site Constraints**

- Significant levels of contaminated land.
- Within an area containing recorded archaeological remains.
- Evidence of potential ecological constraints.
- Potential access issues.

**Development Requirements - any future development proposals should:**

a) provide a high quality residential development;

b) undertake detailed investigations of the contamination to assess the level of remediation required;

c) deliver a surface water drainage scheme that ensures that surface water is not discharged through contaminated soils;

d) undertake an assessment of the archaeological remains;

e) undertake an extensive phase 1 habitat survey and desktop study and provide mitigation as appropriate;

f) address provision for suitable access/egress on Park Road and Lyndhurst Road;

g) enhance permeability and provide an attractive and accessible pedestrian link from the site to the High Street and town centre – this should include consideration of an improved footway / cycleway along the northern boundary.

The Whole Plan viability work has been undertaken by Consultants, the Dixon Searle Partnership (DSP) and this has identified the viability difficulties of delivering brownfield sites, particularly when delivering the Councils preference for rented accommodation rather than intermediate affordable housing. As a result the emerging policy requirement is for 20% affordable housing to be provided on site (75% of which should be rented and 25% intermediate). Of course we wait to see whether the Government pursues its suggested approach of imposing a requirement for 25% There was a lack of interest in the previous idea of Starter Homes and it should be stressed that the clear need is for social rented accommodation to meet Worthing's acute housing need (see the Councils Strategic Market Housing Assessment (SHMA) https://www.adur-worthing.gov.uk/planning-policy/worthing/worthing-background-studies-and-info/housing/housing-need-shma/).

The viability review has also influenced the Council in its review of the Community Infrastructure Levy (CIL). You will be aware of the forthcoming CIL examination at the end of January and the draft schedule suggesting £25 for brownfield apartment schemes would significantly benefit the overall viability of your client's proposal.

**Relevant Legislation**

Section 70 of the Town and Country Planning Act 1990 (as amended) that provides the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations

Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Section 72(1) requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area (s 72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

In considering whether to grant planning permission for development which affects a listed building or its setting, Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990) requires planning authorities to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.

Key constraints/designations

The application site comprises a former gas works site covering some 2.8 acres located to the north-east of the Worthing Town centre. The site has been cleared but there is a pressure reduction station at the north east corner and potential underground infrastructure remaining. The site is bounded to the north by Lyndhurst Road with two-storey terraced cottages; and to the east by Park Road with varied houses of mostly two storeys defined as being within an area of special environmental character under saved local plan policy BE25.

Immediately south of the site is a long three-storey block of flats and the Warwick Gardens Conservation Area. Adjoining the site to the west is a Waitrose supermarket and its large surface car park. Further north and west are other Conservation areas 'Little High Street' and 'Farncombe Road'. Within 500m of the site are a number of Listed Buildings. The site is considered to be a highly sustainable location.

The site is with Flood zone 1 (low risk of flooding) according to Environment Agency Flood mapping. However, it is within an area of major ground water vulnerability and an area of potential contamination owing to its historical use for gas storage.

Principle of development

The application site is allocated under Core Strategy policy Area of Change 7 for residential led development. Policy SS2 of the draft local plan carries forward this residential allocation identifying the site as an opportunity for approximately 150 dwellings.

At this stage it is considered that the redevelopment of the site for high density housing is acceptable, in principle, subject to the considerations set out below:

Density, Scale, Bulk and Massing

As agreed, this pre-application advice follows from the receipt of the Coastal Design Panels response (CDP) dated 9 December 2020 and a detailed site visit. I do not intend to repeat in full the comments but in summary, the recommendations are:

- The analysis undertaken of this part of Worthing should flow into the rationale and principles of the scheme. A line should be drawn under the former use.
- The blocks risk being relentless and a more articulated outline should be sought with careful articulation of the elevations, drawing on the existing and varied architectural character of neighbouring residential streets.
- The central space should be reconsidered.
- The permeability of the scheme is encouraging and routes should be developed further.
- The development will have a major impact on Park Road and Lyndhurst Road and how the perimeter is handled in detail will be as important to the impact on the two streets as height and massing.

*Layout Considerations*

We agree with the Design Panel that the proposal needs to be responsive to the characteristics of the area including the sites relationship with adjoining land uses and the lower scale adjoining residential roads. As noted by the Panel and as we discussed at our initial pre-application discussions the uneven boundary with the Waitrose car park does cause difficulties in layout terms and creating a set piece for the central courtyard and taller building(s) on the site. As the layout places emphasis on creating a central access through the site leading into the car park it is considered important that early discussions should take place with the adjoining freeholders to assess the scope for a land swap to straighten the boundary with the Waitrose car park as well as allowing pedestrian access through to the store and/or town centre. I wonder whether it would be useful to assess a design option which assumes a redefined boundary?

*Height, massing and density*

We support the principle of high density development within the site. However, careful consideration is required in relation to the overall amount of development proposed and how this translates in terms of height, massing and density having regard to the local context and surroundings.

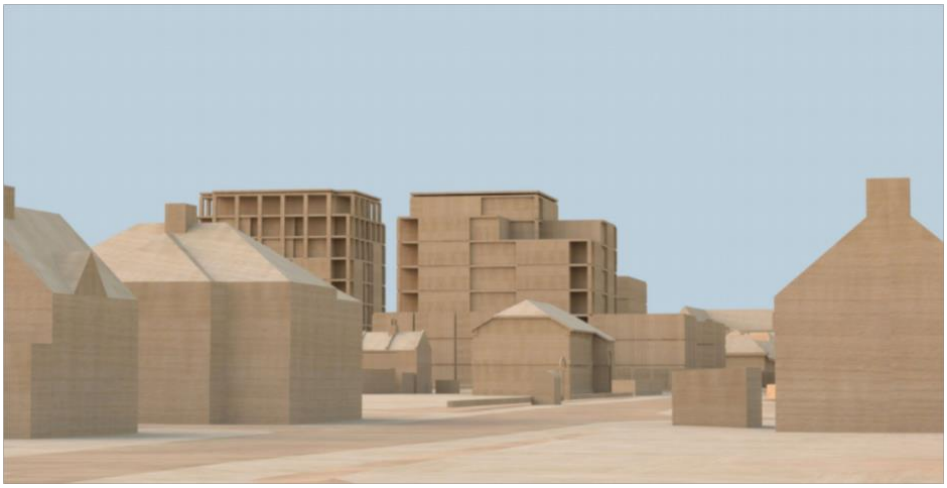
The development around the perimeter of the site needs to provide an adequate transition to lower scale housing around the site. There is support for the principle of lower perimeter blocks but this will need careful analysis and design. Whether 3 storey frontage blocks are acceptable will be dependent on the scope to build at street level (this would need a reduction in current site levels).

Ideally a two storey eaves or parapet line should be considered with either a setback third floor or accommodation contained within the roof to be responsive in particular to the low terraced housing to the north of the site. It will be important to have active street frontages (front doors) and as we discussed before to ensure that these frontage units appear authentic in design terms given the close proximity of higher units to the rear. The step up in scale needs to carefully considered at street level and key street views used to assess

how quickly there is a step up in scale from these lower frontage units. In this respect the current jump up in scale particularly with the north eastern block is of concern.

There has been considerable discussion about the form of the two taller elements on the site. However, the detailed site appraisal, public response and comments of the Design Panel have all raised concern about the overall scale of development and in particular the north-eastern taller element and its potential for being overbearing at street level. The retention of gas control equipment on the corner of the site would not help and accentuate the height and scale of this block. This concern together with the concern about the two blocks merging (and creating an impenetrable mass) when walking around the site and from distant views raises concern about the overall density of development proposed and whether this north eastern block should be a different form and significantly lower.

Whilst, we had suggested assessing the form and height of the former gas tower, local reaction to the scheme suggests that the gas tower was rarely at its full extended site and the Design Panel were clear that the scale height and form of the previous gas towers should not be used to justify the proposed development. This does suggest that the original design concept of two large horizontal elements (albeit square not round needs re-assessing.



Whilst, the Design Panel consider that there could be potential for a slightly higher south-western block the Panel was clearly of the view that the site is not in a town centre location like Union Place and it would not be appropriate to seek to replicate a 14 storey tower. Nevertheless, it could create a strong focal point when viewed from the west albeit this is diminished slightly by the overlapping 5 storey element. The constraint caused by the existing boundary line with the car park also affects the scope to create a set piece for this taller element when viewed across the open car park. It would worthwhile assessing the scope to free up the tallest element if this long view helps to justify height on this part of the site. It is interesting that viewing across the site currently gives you a view of the HSBC building in Francombe Road Conservation Area (a negative contributor to the area).

Any increase in height of the south-western tower should consider the scope for more verticality. As commented by the Panel the silhouette is important and careful consideration should be given to matters such as plant rooms and lift over-runs. A recent development with a large enclosed (black) plant room has a detrimental impact on the skyline (new HMRC building adjacent to the railway station) whilst the new Bayside development with its new white cylindrical plant room helps to elegantly finish the tower and enhance the skyline. The scope for a recessed top floor (pavilion penthouse or plant room) could be considered following through the initial thoughts of colonnade and recessed elements.

Should the proposal increase heights above the 9/10 storeys, an assessment of the wider impacts maybe required e.g. on views from the SDNP. The National Parks comments on Union Place might assist here in terms of key viewpoints.

*Architectural Approach / Built Form*

As referred to by the Design Panel whilst a range of buildings could be accommodated within the site, consideration of how to create a silhouette of variety and interest is important. We agree that the scheme should not offer a *'seemingly impenetrable mass or unrelieved flat roofs into such a heterogeneous area.'* As indicated above a review of the two principle buildings and a slight reduction in numbers could help to provide greater focus to the taller element set within the site.

The analysis of local character and context has been thorough and it is now important to understand how this will be reflected in the scheme. The tallest element with its simpler plan form is supported as well as the design approach of breaking down the mass with recessed elements and a strong pronounced frame. A contemporary approach is supported provided that for the perimeter buildings they can reflect local context in form and materials. To create the variety and interest referenced by the Design Panel some thought should be given to different roof forms provided that there is an appropriate visual break between blocks. There is some concern about how the development will be viewed side on (along Lyndhurst, Park Road etc.), when the larger blocks merge with the lower perimeter buildings. At these points set backs and a contrast in materials would assist.

*Open space / Landscaping*

The central area of open space is important to the overall layout and creating a strong sense of identity and amenity for residents. As indicated by the Design Panel the central open space should be revisited to ensure a higher quality environment is created. There is an obvious conflict between public and private space and this needs to be reconciled. It is likely that unless the Waitrose site is redeveloped this will remain an essentially private space but with access for residents to local amenities.

It will be interesting to see what the Highway Authority feels about the scope for improving pedestrian access along Lyndhurst Road given the constraints of the Waitrose site in delivering any significantly wider footpath. Current Government advice discouraging shared cyclepaths might question the practicality of a segregated cyclepath along this section of Lyndhurst Road.

Overall, further testing of the scheme in terms of overall height, scale and massing is required as it has not yet been demonstrated that the quantum of development proposed can be accommodated within the site satisfactorily.

<u>Historic environment;</u>

The application site is adjacent to the Warwick Gardens Conservation Area and also the setting of a number of listed buildings in the wider townscape. The impact on these heritage assets would need to be carefully considered as part of heritage statement for the proposal taking into account material considerations such as the conservation area appraisal and the Council's historic environment records.

The general bulk, massing and scale of site which need to be carefully considered i.e. how the building would be experienced within the context of designated heritage assets and the

historic town setting on both short and longer distance views. Kinetic views from key vantage points should be used to test the scope for higher elements.

In terms of archaeological considerations, as the site is within an area of potential archaeological significance, an archaeological assessment would therefore be required, although it is recognised that parts of the site will have been disturbed previously when underground infrastructure works associated with the gas storage use were undertaken.

Highways matters

Notwithstanding that WSCC Highways provide their own pre-application advice service, below are some initial comments to assist at this stage:

*Access*

The access arrangements would need to meet relevant WSCC highway standards including access and visibility requirements.

A Transport Assessment would be required as part of the formal application for planning permission. It is also likely that a Road Safety Audit would be required to address any highway safety issues such a visibility and safety.

*Car and cycle parking provision*

You are required to assess the parking needs for any development by using the West Sussex 'Guidance on Parking at New Developments' (WSCC 2019). This is passed upon Parking Behaviour Zones. Live EV charging points would be expected at a minimum of 28% of all car parking spaces plus 100% of cabled ducting for future provision. The guidance can be found at the link below:

https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf

It is also recognised that the sustainable location of the site could be used to justify a reduction from those standards. The promotion of car clubs and sustainable transport measures would be ways of justifying lower levels of car ownership.

It is noted the Design Panel consider that the site is sustainable and could accommodate a parking ratio of 0.6 parking per unit without dominating the site. Should you be minded to follow such an approach then this should be explored in consultation with WSCC Highways in the context of the overall package of sustainable transport measures that would be provided as part of the development. We would support this parking ratio on this site if accompanied by appropriate Travel Plan measures to encourage more sustainable travel.

Drainage and flooding;

The application site exceeds 1 hectare as such it would require a Flood Risk Assessment and the Environment Agency would need to be consulted.

The historical use of the site means there is likely to be a significant presence of hydrocarbons. Depending upon site design and the mitigation strategy used, this could mean infiltration for surface water drainage will not be viable.

If underground attenuation is proposed, we would still require winter groundwater monitoring to ensure that peak seasonal groundwater levels are accounted for in design, i.e. adequate

measures to address the risks of flotation. If infiltration is proposed, winter infiltration testing above peak groundwater level would also be required.

Sustainable drainage (SuDS) should be included in the design that provides water quality improvement, water quantity control, amenity and biodiversity. Some examples of the forms of SuDS that could be considered on this site are permeable paving, green roofs, blue roofs and rain gardens.

Further guidance is provided with the Councils surface water drainage guidelines and checklist before submitting a formal application. These documents can be found here: https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms

Residential amenity (future and existing occupiers);

*Future Occupiers - internal amenity space and daylight*

In terms of proposed internal amenity space, The Nationally Described Space Standards set out the range of internal space needed for new homes. The space standards indicate minimum flat sizes of 39 – 58sqm for one bedroom units, 61- 79sqm for two bedroom units and 74-90sqm for three bedrooms. Proposed accommodation should also ensure good overall levels of day light are achievable taking into design considerations such as window sizes and positioning. This would mean careful consideration of building plot depths and avoiding single aspect north facing apartments.

In respect of external amenity space, the 'Space Standards SPD' indicates the provision of 20sqm should be made per apartment. This can include the use of balconies, terraces and communal space. It is unclear whether the proposal would comply with these standards but it is noted the scheme includes balconies and terraces which would count towards the 20 m2 per unit.

*Future Occupiers – access to public Open Space*

Whilst the comments of the Parks Manager are awaited, there is a recognised shortfall in public open space within the Borough as identified within our recent Open Space Sport and Recreation Strategy. It is likely that financial contributions towards the improvement of local open space and recreation facilities will be requested and there is scope for further enhancements of Beach House to the east. The Council has a new open space calculator to assess the level of open space required on new developments and any shortfall would be addressed by an off-site contribution..

*Future Occupiers - noise*

The site is close to a range of nearby noise sources and therefore a noise assessment should be submitted to demonstrate how future residents would be protected from noise. ProPG: Planning and Noise, describes an acoustic design process which seeks to deliver the best acoustic design outcome for a particular site. Any future noise assessment for the site will have to follow the principles of this guidance and shall deliver the internal noise level guidelines set out in BS8233:2014. If applicable the scheme shall also achieve as far as reasonably practicable the WHO guidelines for external amenity areas. Any acoustic schemes to protect the development from noise could include mechanical MVHR ventilation, with summer bypass. Of immediate concern is the proximity to the Waitrose loading bay and car park and assessments of nose generated during loading and unloading particularly at unsocial hours will be required.

*Existing Occupiers*

The occupiers of neighbouring residential properties would be affected the proposal therefore it would need to be demonstrated the development would not have an unacceptable impact on adjacent properties, including unacceptable loss of privacy, daylight/sunlight, or outlook. It may also be necessary to provide supporting information such as daylight/overshadowing assessment to assess any impact on existing habitable room windows on neighbouring properties.

To protect the neighbouring amenity from environmental impacts associated with the construction process, planning conditions could be used to secure the implementation of construction environmental management plan (CEMP) which would regulate and guide construction work, including hours of work, control of impacts including noise, dust and fumes, external lighting, amongst other measures.

Air quality

The proposal would potentially impact on local air quality as such the applicant is directed to the Air Quality & Emissions Mitigation Guidance for Sussex (2020) - http://www.sussexair.net/ImprovingAQ/GuidancePlanning.aspx.

Good design is key to reducing air quality impacts - this is emphasised in the Guidance. A development close to the existing road will not be acceptable from an air quality point of view as it exposes future occupiers to potentially elevated levels of air pollution. (A development close to the road will also expose occupiers to elevated levels of noise).

The intention of the guidance is to assist in identifying air quality impacts through an air quality impact assessment (AQIA) and ensure the integration of appropriate mitigation via an emissions mitigation assessment. The emissions mitigation assessment is used to inform the level of mitigation required to help reduce/offset the potential effect on health and the local environment. The mitigation shall not duplicate any mitigation required by other standards (e.g. parking standards). Consultation with Public Health & Regulation is advised at an early stage.

The AQIA must include a cumulative impact assessment - a list of relevant developments that should be included in a cumulative assessment can be supplied, for example, the mixed use development proposals at Union Place (LPA reference AWDM/0461/20).

Land contamination;

This site has been identified as being contaminated due to its use as a former gas storage facility and therefore the redevelopment of the site would provide an opportunity remediate contaminated land.

We would expect a scheme to be submitted to deal with the risks associated with contamination of the site. The scheme should consist of the following components:

(1) A preliminary risk assessment which has identified: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.

(2) A site investigation scheme, based on (1) above to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

(3) The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

(4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the Local Planning Authority.

A scheme should be implemented as approved above and, prior to commencement of any construction work (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a Verification Report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

Fire Safety

The Fire Safety Officer would comment on any formal planning application (albeit a matter covered by Building Regulations). Consideration to the following fire safety requirements would be likely:

- The level of fire detection
- The level of emergency lighting
- Travel distances
- Avoiding inner room scenarios
- Two-door protection
- AOVs (Automatic Opening Vents) and smoke ventilation
- Fire doors
- Levels of compartmentation
- Achieving the 45m rule or 15% of the building perimeter
- The need for sprinkler systems as the buildings will exceed 11m in height
- Access for Fire Service Vehicles

Affordable Housing

In accordance with the requirements of Core Strategy Policy 10, a mix of affordable housing, including social rent and intermediate housing will be sought on the basis of 30% of the total number of units on-site in the first instance subject to the economics of provision. Where a viability case is made, this would need to be considered by the councils viability consultants with the cost falling on the applicant.

Where the Council accepts that there is robust justification, the affordable housing requirement may be secured through off-site provision. The appropriate mix in terms of housing tenures, house sizes of affordable housing and spread within a development will be determined in response to identified needs, funding priorities and housing strategy targets at the time of the development. The calculation for off-site contributions is set out in the

relevant SPD albeit this is currently under review in connection with the emerging Local Plan.

Whilst it cannot attributed significant weight at this stage, it is important to note as mentioned previously that emerging policy DM3 'Affordable Housing' indicates for sites on previously developed land involving the development of flats there will be a requirement for 20% affordable housing. By the middle of 2021, it is expected that the policy will be a material consideration for the purposes of decision making and therefore may improve the viability prospects of the scheme overall.

As we have discussed DSP are aware of this site and I look forward to any viability assessment so that we can have early discussions about what level of affordable housing can be achieved on this site. As indicated we are also keen to encourage applicants to work with Registered Providers that have a strategic partnership with Homes England whereby additional affordable housing grant can be used post planning to enhance any on site provision.

Sustainability

Policies 17 and 18 of the Core Strategy seek sustainable and energy efficient development. In 2019 the Council declared a Climate Emergency. To address these matters, a range of measures would be sought such as the incorporation of renewable/low carbon energy production requirement to meet some of the predicted energy requirements. Other technologies such as air source heat pumps, green/blue roofs and using a fabric first design approach should also be considered. A concise Sustainability Statement and Energy Statement would therefore be required to address these requirements.

Whilst it cannot attributed material weight at this stage, it is important to note emerging policy DM16 'Sustainable Design' of the draft Worthing Local Plan seeks to move towards zero carbon development, with all new build housing achieving a minimum 20% Co2 reduction through energy efficiency measures, and where achievable a 31% reduction in CO2 based on the 2013 Edition of the 2010 Building Regulations (Part L). All major developments will need demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions in line with the energy hierarchy. By the middle of 2021, it is expected that the policy will be a material consideration for the purposes of decision making and therefore it is advisable to ensure your proposals are capable of complying with its requirements.
We have mentioned the work currently being undertaken in connection with a District Heat Network (DHN) to serve the Councils civic buildings and the town centre. Our Sustainability team can help provide further guidance but they have indicated that they would look to encourage a combined heat and power solution (CHP) that would facilitate connection to a DHN if provided within a reasonable timescale.

Ecology

The application site is located within a built up area comprising brownfield that is unlikely to raise any significant adverse ecological impacts but could provide opportunities to provide ecological enhancements/net gain in habitats which should be explored. In line with the emerging Environment Act the Council would be looking for a 10% net gain in biodiversity (the emerging Plan encourages 20% on brownfield sites).

Infrastructure and services/Planning Obligations;

This would need to be considered depending on specific requirements of relevant consultees but it is likely provision would be required towards affordable housing, local transport improvements (e.g. cycleways), car club, air quality mitigation measures and open space, and potentially healthcare.

Planning validation requirements

In terms of submitting a planning application, the following supporting documentation will be required.

- Planning Application Form and Certificates;
- Site Location Plan;
- Block Plan
- Drawing Schedule;
- Existing and proposed floorplans
- Existing and proposed elevations
- Contextual elevations;
- 3D Visualisations
- Heritage and Archaeological Statement;
- Design & Access Statement;
- Planning Statement;
- Energy/Sustainability Statement;
- Transport Assessment and Travel Plan;
- Townscape/Landscape Visual Impact Analysis
- Landscape Design
- Noise Impact Assessment;
- Air Quality Assessment;
- Flood Risk Assessment and Drainage Strategy;
- Sunlight and Daylight Assessment;
- Microclimate Assessment;
- Land Contamination Report;
- Ecology Statement;
- Housing unit schedule (tenure and mix);
- Verified Views Analysis;
- Viability appraisal (where relevant)
- Planning Obligations (Draft Heads of Terms)
- Any other supporting documentation deemed during the pre-application discussion period to be necessary or desirable.

Full details can be found in the Council's Local Validation List at the link below:

https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms/#validation-list

Resourcing

A separate agreement will need to be reached in terms of resourcing costs for additional pre-application meetings and design reviews, external consultancy advice e.g. viability and additional resources set out the in draft PPA.

Going forward

Whilst it is common ground the site is suitable for residential redevelopment, further testing of the scheme in terms of overall height, scale and massing is required as it has not yet been demonstrated that the quantum of development proposed can be accommodated within the

site. However, as noted by the Design Panel the initial analysis and modelling has been very thorough and we welcome the opportunity to work closely with the team to ensure that a high quality scheme can be developed on the site securing high density whilst successfully integrating into the existing urban grain.

Yours sincerely

[redacted]

James Appleton
Head of Planning and Development
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## Sam Sykes

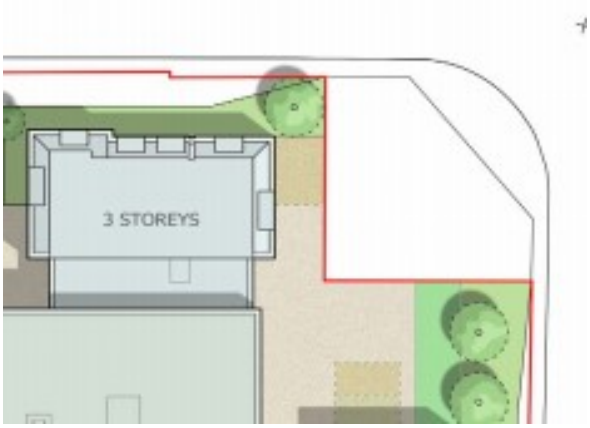
**From:** James Appleton <james.appleton@adur-worthing.gov.uk>
**Sent:** 12 March 2021 19:50
**To:** Chris Barker; Sam Sykes
**Cc:** Stephen Cantwell; Richard Small; Hugo Maudsley; Simon Lewis; Rowena Maslen; Linda Amos
**Subject:** Gas Works Site

**Categories:** Filed by Newforma

Chris/Sam,

Thanks for sending the additional images through and following a further review of the latest scheme. I hope you find the following of assistance in advance of the workshop with the DSE on the 24th.

We are generally supportive of the approach to reduce the scale of the NE block, overall density and the general architectural approach to 3 storey perimeter blocks. The principle of a nine storey higher element in the position shown is also supported. However, there are elements of the scheme that we feel need further work and justification and we would like the following to be explored and ideally re-considered.

- The view from the corner of Park Road and Lyndhurst road is an important one and as we discussed the treatment of the corner is important not only in relation to the gas equipment and boundary treatment but also the relationship of the 5 storey element with the NE corner. At present the Masterplan presents a rather confused relationship with the corner and the adjoining 3 storey elements. A taller element set back element addressing the street makes sense but perhaps should be framed by the 3 storey elements. Some thought should be given to setting back the northern 3 storey element the same distance as the eastern block.
- 


- To accentuate the corner feature and reduce the scale on more sensitive frontages this element would benefit from stepping down to 4 storey either side of the corner element (where there is a shadow break in the brickwork. This would also assist the more distant views where the scale of the 5 storey element appears rather unrelieved and overly dominant on the lower scale frontages.

- We remain concerned about the relationship between the 3 storey perimeter blocks and the higher elements to the rear. The flat roof connecting elements do not work and we would like to see further justification and understanding of how this impacts on accommodation and alternative design options. A greater set back would certainly need to be considered if the 3 storey element is retained as indicated in the SE block below:

- The 4 and 5 storey elements appear more as quasi industrial warehouses in appearance and it is questioned how this reflects local vernacular and local context. Some further thought on this would be needed for the DSE presentation and as supporting narrative for the application.
- The greatest concern however relates to the 9 storey tower and it is questioned whether references to the form of the former gas holder on the site is helpful in terms of selling the scheme to the local community or Planning Community. It is important to have regard to our Tall Buildings SPD and Cabe guidance and of course these stress the importance of taller elegant structures and exemplar design. The current design and form is too assertive and appears rather brutalist in its strong grid form and use of grey colouring. I asked about the lighter weight metal sections and whether the main structural elements would be clearly read at greater distance and greater thought should be given to a narrower form - possibly setting back the recessed balcony bays and removing the framing at top floor level. The silhouette of the tower is important and its current form and squat appearance needs further analysis.

We are happy to discuss these points in further detail prior to the DSE. Although I am meant to be on leave next week I seem to be attending 3 or 4 meetings and therefore could still make myself available.

Regards James

**James Appleton**
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Worthing
West Sussex

# Appendix C – Design Review Panel Responses (Chronologically Ordered)

Design South East

Report of the Coastal West Sussex design review panel

# Gasworks site, Worthing

9 December 2020

## The design review meeting

| | |
|---|---|
| **Reference number** | 1486/111120 |
| **Date** | 11th November 2020 |
| **Meeting location** | Online, via Zoom |
| **Panel members attending** | Lorraine Farrelly (Chair), Architecture, Urban Design<br>Steven Bee, Historic Environment, Public Realm, Urban Design<br>David Gausden, Architecture, Urban Design<br>John Pegg, Landscape Architecture, Urban Design<br>Robin Smith, Architecture, Regeneration, Urban Design |
| **Panel manager** | Timothy Cantell |
| **Presenting team** | Ben Daines, ECE Planning<br>Chris Barker, ECE Planning<br>Lizzie Withall, ECE Planning<br>Hugo Maudsley, St Williams Homes LLP<br>Kathryn Chung, St Williams Homes LLP<br>Simon Lewis, Berkley Group<br>Michael Taylor, Max Tayefi Architect Inc.<br>Katy Neaves, Neaves Urbanism |
| **Other attendees** | James Appleton, Adur & Worthing Councils<br>Richard Small, Adur & Worthing Councils<br>Sarah Brown, Design South East |
| **Site visit** | This review was carried out during the Covid-19 outbreak in 2020. A digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review, with the assistance of the design team. |
| **Scope of the review** | As an independent design review panel, the scope of this review was not restricted. However, as we were reviewing the scheme at an early stage, we did not discuss the architectural detail. |
| **Panel interests** | Panel members did not indicate any conflicts of interest. |
| **Confidentiality** | This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report. |

# The proposal

| | |
|---|---|
| **Name** | Former Gasworks Site |
| **Site location** | Lyndhurst Road, Worthing, BN11 2DB |
| **Site details** | Worthing Gasworks is a flat 2.8-acre site located to the north east of Worthing town centre. Gas use ceased in 2009 save for some minor remaining infrastructure mostly underground, and the last gasholder was demolished in 2018. While no buildings remain on the site above ground apart from a pressure reduction station at the north east corner, there may still be substantial structures remaining below ground level.<br><br>The site is bounded to the north by Lyndhurst Road with two-storey terraced cottages; and to the east by Park Road with varied houses of mostly two storeys. Immediately south of the site is a long three-storey block of flats. Adjoining the site to the west is a Waitrose supermarket and its large surface car park.<br><br>The wider context is the town centre to the west, a hospital to the north east with residential to the north, south and east. The site is 7 minutes walk to the seafront (south) and 14 minutes walk to Worthing station (north west). The site is near almost all the bus routes in Worthing. |
| **Proposal** | The scheme is for new build residential development of some 200-220 residential units with associated car parking provision, landscaping, open space and access. Heights range from three to eight storeys. The arrangement is for two 'gasholder typology' buildings, three buildings at an intermediate scale and six smaller buildings at a domestic scale. There are two vehicle accesses, both off Park Road.<br><br>Site investigation has been done and remediation will come post-planning stage. |
| **Planning stage** | The scheme is at Pre-Application stage. A full Planning Application is due to be submitted in March 2021. A Pre-Application meeting took place in October 2020. |
| **Local planning authority** | Worthing Borough Council |

**Planning context**

The site is identified as an 'Area of Change' within Worthing's Core Strategy 2011 and is allocated for development within Worthing's Local Plan. It is seen as ‘an opportunity for high quality residential development within a highly sustainable location within the town centre boundary’. The Local Plan is expected to indicate a minimum of 150 dwellings.

Warwick Gardens Conservation Area abuts the site to the south east. There are no listed buildings close to the site

**Community engagement**

The first public consultation is due to start shortly

## Summary

The Panel welcomes redevelopment of this brownfield site close to the town centre. It is a sustainable location for residential use and a high-density scheme with a low parking ratio is supported.

A design review at an early stage is commended. A strong start has been made and much of the analysis and design work has been well considered. The scheme was well presented, and the images of a physical model were a useful tool.

The former use as a gas works, however, figures too strongly in the rationale for the design approach. The scheme should take its cues from the character of the surrounding residential streets of the town near to the site and make its case on its own merits as a contribution to Worthing's character.

The height and massing proposed could be appropriate for the area in the panel's view, but more variety and articulation should be sought to form an interesting silhouette on the skyline.

The site planning is encouraging, and new pedestrian and cycle routes are welcome.

The spaces within the scheme are key to its success as a place and the central garden or square could offer a more attractive and useful space and route.

## Key recommendations

1. The analysis undertaken of this part of Worthing should flow into the rationale and principles of the scheme. A line should be drawn under the former use.

2. The blocks risk being relentless and a more articulated outline should be sought with careful articulation of the elevations, drawing on the existing and varied architectural character of neighbouring residential streets.

3. The central space should be reconsidered.

4. The permeability of the scheme is encouraging and routes should be developed further.

5. The development will have a major impact on Park Road and Lyndhurst Road and how the perimeter is handled in detail will be as important to the impact on the two streets as height and massing.

# Detailed comments and recommendations

### 1. Design rationale

1.1. Gas production and storage were intrusive uses alien to a residential area on the edge of the town centre and Worthing would be wise to confine them to history. The scheme is a fresh start and an opportunity to reflect, and add to, the character of the area.

1.2. The proposals should form their own rationale and not rely on former structures either as a datum or in carrying forward 'gasholder typology' buildings. There need be no obligation to carry 'gasworks' into the name of the scheme.

1.3. The scheme can and should generate its own character but one that is influenced by and adds to the character of this part of Worthing. There are delightful streets nearby that offer cues to this scheme, particularly Park Road, part of which is in a conservation area. Its varied architecture, enlivening features such as bay windows, predominantly Georgian proportions and palette of materials could inform the scheme.

1.4. A feature of the public consultation might be to invite suggestions of what aspects of the character and quality around the site could characterise the scheme, so engaging people with the idea of a new use and a fresh start for the site.

### 2. Height, massing and density

2.1 Height and massing could be appropriate for the area if the overall quality of the scheme reflects that of the locality. The reduction of scale close to Park Road and Lyndhurst Road is sound.

2.2 Conceivably, height within the scheme could rise to a higher maximum, given the nearness of the scheme at Union Place with a 14-storey tower. This site is further away from the town centre and 14 storeys would not be apt, but the south-western large block could be a little higher provided its architecture had the elegance and quality required to respect the character of the surrounding area.

2.3 High density is supported, though 200-220 units is the most that the site can satisfactorily accommodate. If one block rises to contain more units then more space between buildings should be the consequence, not a higher quantum. This balance between blocks needs to be carefully considered to complement the site.

2.4 Those elements that are extrusions of a larger block may be challenging in terms of depth of plan, especially if single aspect. The two north-facing smaller buildings on Lyndhurst Road in particular will need to offer acceptable living conditions.

2.5 The high quantum of proposed development has implications for parking provision. The panel believes that at a ratio of 0.6 parking per unit can be absorbed without dominating the site. Were the ratio to be higher, say 1 per unit, then the scheme's character would be marred by the extent of surface parking. 0.6 seems a reasonable proposition for such a sustainable location.

## 3. Built form

3.1. The approach of a family of buildings coherently and legibly disposed on the site is promising. Design work on the blocks is at an early stage but there should be an indication now of how more interest is to be realised. The scheme should not offer a seemingly impenetrable mass or unrelieved flat roofs into such a heterogeneous area. The use of the roofs may help – there is great potential for roof gardens – but more articulation is needed to create a silhouette of variety and interest.

3.2. Roof materials will be important, both for silhouette and the views from higher to lower buildings in the scheme. It was encouraging to hear that green, blue or brown roofs are being considered, both for appearance and biodiversity.

3.3. Balconies will add character and interest, and these must be of useful dimensions to all apartments. The relationship between public outside space and private balconies requires further consideration.

3.4. The next stage of the scheme should consider how the affordable housing – possibly 20% or more of the project – will be handled in terms of built form to generate a truly tenure-blind development across housing units and shared green spaces.

## 4. Spaces

4.1. The green garden character suggested is fine in principle, as is the aim to provide a rich variety of spaces with distinctive identities which can be used in multiple ways by both the public and residents.

4.2. The architect and landscape architect should collaborate closely. The success of the external spaces is not just a matter of planting, furniture and surface treatment: the dimensions of the space and the facing elevations of the surrounding buildings are critical too. Inward-facing elevations even on different types of buildings should relate to each other and be different from those on the outside. The location of building entrances will influence how the spaces between them are used. Having as many front doors as possible onto the two surrounding streets would be advantageous.

4.3. The central space is intended to be a unifying feature and certainly has potential to become a lively focus. However, the circle motif is not helping and would be hard to

read at ground level. More work is required to ensure that this will be attractive and useful space.

4.4. Dense planting within the scheme is ill-advised. The spaces will tend to be shaded by buildings so trees would add to this effect and also limit views.

4.5. The surrounding streets would, however, benefit from more trees, if space can be created. The residual gas supply installation outside the north west corner of the site is an unfortunate necessity and careful planting and screening in this area should minimise its visual impact without impeding access.

**5. Routes**

5.1. The permeability of the scheme is encouraging. The public routes through the site will help it to integrate with surrounding established and future development. The scheme will improve access to the town centre for pedestrians and cyclists, contributing to the Council's cycling and walking improvement plan.

5.2. The axis on the portico of St Paul's Church is an imaginative contribution both to the scheme and the town. While glimpsed views are also valuable, if this axis is to be the unifying feature then the L-shaped block should be adjusted to allow a straighter view, avoiding a dog-leg at the square. The axis is more than a visual device – it will connect the development with the heart of the town functionally as well.

5.3. The path on this axis will lead only to the car park at Waitrose initially. That the scheme looks not only to the short term, but also longer-term possibilities is applauded. It is conceivable that better use will one day be made of the store's surface car park, even if the whole site is not redeveloped.

5.4. Ideally, the development potential of the adjacent site would be resolved before this scheme went ahead. The Council might engage with landowners and support a planning brief for the whole block. Land swaps and meantime uses could also be considered. As it is, this scheme is somewhat hampered by the awkward site boundary and the known unknown of the future of the adjoining site.

5.5. A pedestrian route cutting off the corner between Park Road and Lyndhurst Road is welcome. A desire line could also be southbound and the possibility of a route over the southern boundary should continue to be pursued and provided for in the layout.

5.6. Cycling provision needs to include safe and convenient cycle storage.

## 6. Edges

6.1. The relationship of the development to the two bounding streets north and east merits careful thought. Park Road and Lyndhurst Road are different, and it follows that the perimeter should be treated in a manner appropriate to each street

6.2. The perimeter walls are pleasing in places and – if there is no compelling reason to remove them – it might be worth exploring retention of parts or even a perforated wall. The perimeter wall, if retained in part, would need to be carefully considered as part of the broader landscape design that adds to the street character and the proposed development.

## 7. Assessing the scheme

7.1. The site context aerial view and the figure ground aided our analysis and assessment of the scheme.

7.2. The scheme needs to be considered not only in relation to the town centre and the adjacent streets but also to the Hospital and the green finger that runs north from sea to the Hospital. How this scheme links to both should be shown.

7.3. An appraisal of how the scheme will appear in views will need to be provided for the assessment. Long views such as from the Downs and the pier should form part of this. And it would be useful to have views in sequence as the observer moves along say Lyndhurst Road, Park Road and other parts of the Warwick Gardens Conservation Area.

## 8. Energy strategy

8.1. The approach to energy efficiency was not discussed in great detail at this review. Our guidance is that at the planning application stage the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables in order to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

8.2. The site has not yet been remediated. The developer has good experience of developing similar sites elsewhere, but the capping of on-site contamination, or the disposal of contaminated material elsewhere have sustainability implications that should be factored into the scheme's environmental performance overall.

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The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.

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Design South East

Report of the Coastal West Sussex design review panel

# Gasworks site, Worthing

12 April 2021

## The design review workshop

| | |
|---|---|
| **Reference number** | 1545/240321 |
| **Date** | 24th March 2021 |
| **Meeting location** | Online, via Zoom |
| **Panel members attending** | Lorraine Farrelly (Chair), Architecture, Urban Design<br>Steven Bee, Historic Environment, Public Realm, Urban Design<br>David Gausden, Architecture, Urban Design |
| **Panel manager** | Timothy Cantell |
| **Presenting team** | Hugo Maudsley, St Williams Homes LLP<br>Simon Lewis, St Williams Homes LLP<br>Rebecca Ford, St Williams Homes LLP<br>Kathryn Chung, St Williams Homes LLP<br>Michael Taylor, Michael Taylor Architects<br>Chris Barker, ECE Planning<br>Sam Sykes, ECE Planning<br>Keith Miller, Lizard<br>Michal Zarzecki, Lizard<br>Roberto Marchetti, Lizard |
| **Other attendees** | James Appleton, Adur & Worthing Councils<br>Stephen Cantwell, Adur & Worthing Councils<br>Richard Small, Adur & Worthing Councils<br>Sarah Brown, Design South East |
| **Site visit** | This review was carried out during the Covid-19 outbreak in 2020-21. A digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the first review, and a refresher before the second. |
| **Scope of the review** | As an independent design review panel, the scope of this review was not restricted. |
| **Panel interests** | Panel members did not indicate any conflicts of interest. |
| **Confidentiality** | This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report. |

# The proposal

**Name**

Worthing Gasworks

**Site location**

Lyndhurst Road, Worthing, BN11 2DB

**Site details**

The site of the former Worthing Gasworks located to the north east of Worthing town centre. The site is flat and of 1.12 Ha (2.8-acres). Gas use ceased in 2009, and the last gasholder was demolished in 2018. While no buildings remain on the site above ground apart from a pressure reduction station at the north east corner, there may still be substantial structures remaining below ground level.

The site is bounded to the north by Lyndhurst Road with two-storey terraced cottages; and to the east by Park Road with varied houses of mostly two storeys. Immediately south of the site is a long three-storey block of flats. Adjoining the site to the west is a Waitrose supermarket and its large surface car park.

The wider context is the town centre to the west, a hospital to the north east with residential to the north, south and east. The site is 7 minutes' walk to the seafront (south) and 14 minutes' walk to Worthing station (north west). The site is near almost all the bus routes in Worthing.

**Proposal**

The scheme is for new build development of some 200 residential units with associated car parking provision, landscaping, open space and a new access point off Lyndhurst Road.

The arrangement is for one block of nine storeys, four at an intermediate scale up to seven storeys and four at three storeys facing Park Road and Lyndhurst Road.

There are two vehicle accesses, both off Park Road, plus a pedestrian access point off Lyndhurst Road.

Site investigation has been done and remediation will come post-planning stage.

**Planning stage**

The scheme is at Pre-Application stage. A full Planning Application is to be submitted. Pre-Application meetings started in October 2020 and are continuing.

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|---|---|
| **Local planning authority** | Worthing Borough Council |
| **Planning context** | The site is identified as an 'Area of Change' within Worthing's Core Strategy 2011 and is allocated for development within Worthing's Local Plan. It is seen as ‘an opportunity for high quality residential development within a highly sustainable location within the town centre boundary’. The Local Plan is expected to indicate a minimum of 150 dwellings.<br><br>Warwick Gardens Conservation Area abuts the site to the south east. There are no listed buildings close to the site. |
| **Planning history** | None relevant |
| **Planning authority perspective** | The local authority seeks the panel’s advice on the proposal’s quality in terms of scale, height and massing, architecture, routes and open space. Residential use is accepted. |
| **Community engagement** | Public consultation to date has been a virtual presentation and Q&A session held on 26th November 2020. |
| **Previous review** | This scheme has previously been reviewed by the panel on 11th November 2020. Following that review our report stated that the design approach should take its cues from the character of the surrounding residential streets, not the former gas works.<br><br>The height and massing proposed could be appropriate for the area, but more variety and articulation was sought to form an interesting skyline.<br><br>The spaces within the scheme could offer a more attractive and useful space and route. New pedestrian and cycle routes were welcomed. |

## Summary

The panel welcomes redevelopment of this brownfield site close to the town centre. It is a sustainable location for residential use and a high-density scheme with a low parking ratio is supported.

The scheme was well presented, and the images of a physical model were a useful tool. Much of the analysis and design work has been well considered.

The height and massing proposed are appropriate for the area in the panel's view, but further architectural refinement is needed, particularly to make the tallest block appear less squat. The relationship of perimeter and intermediate blocks merits further work, and the treatment of the two streets should vary.

The permeability of the scheme is good, routes are well defined and new pedestrian and cycle routes are welcome. The spaces within the scheme work well and the east-west route with its vista to the town centre is positive. The Park Road pedestrian entrance could be scaled down.

## Key recommendations

1. The scale, height and massing are appropriate for this site on the edge of the town centre. The visual impact both from the adjacent streets and from more distant points is acceptable.

2. The tallest block is well sited away from the streets at a domestic scale, but it needs further work to make it appear less squat. One further storey could be considered if the proportions of the building were appropriately adjusted.

3. The pressure reduction station at the north east corner is a given, but further consideration should be given to the extent of land associated with it and how its impact on the scheme can be minimised, including appropriate treatment of the boundary around the structure.

4. The pedestrian entrance on Park Road seems unduly spacious for the numbers likely to use it. As it is a different scale of road to Lyndhurst Road this should be reconsidered to suit the adjacent streetscape.

5. Amenity space at ground level is not generous and use of some roofs for gardens or sitting areas should be considered again.

# Detailed comments and recommendations

### 1. Height, massing and density

1.1 The height and massing are appropriate for this area at the edge of the town centre.

1.2 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. The nearness of the scheme at Union Place with a 14-storey tower is also a factor.

1.3 The stepping back from Park Road and Lyndhurst Road with the tallest block sited towards the south western corner of the site is sound in principle. The smaller-scale perimeter buildings considerably reduce the impact of the scheme on the two adjacent streets.

1.4 The quantum of development is high, and the scheme is asking a lot of an awkwardly shaped site. However, in the panel's view, the density can be accepted provided the design quality of the scheme as a whole is high.

1.5 The approach of a family of buildings coherently and legibly disposed on the site is supported and it is important that the materials and architectural language have family attributes in common across the site.

1.6 The offset of housing blocks relative to one another is an effective approach. The collage of patterning envisaged is good for the character of the scheme and should become a comprehensible narrative for the whole site. If anything, the language should be simplified to avoid fussiness, the terracotta on the main block is perhaps not helping. The steel balconies will provide valuable private space in this dense development but will have to be carefully designed and installed if they are to enhance the elevations.

### 2. The tallest block

2.1 While a nine-storey block is acceptable in principle, the proportions of this block at present make it feel heavy and the design treatment seems to accentuate its width over its height.

2.2 The panel suggested at the first review that the maximum height of the scheme could be higher, provided massing and architecture respected the character of the surrounding area. We now suggest that one further floor could be added to the highest block, taking it from nine to ten storeys, again provided the architectural

approach is sound. More dwellings in this block should relieve pressure of density elsewhere in the scheme, not add to the quantum.

2.3 Further refinement of the design of the block is called for to accentuate its height and diminish its apparent width. A number of approaches to make the block seem taller and more elegant were put forward and two options were presented. The panel thought both options were valid, and each had advantages and disadvantages. The design team should seek to combine the greater apparent height of option one and the more interesting silhouette of option two.

2.4 As the panel stated before, the scheme should not impose a set of flat roofs into such a heterogeneous area but create a silhouette of variety and interest. The scheme is better in this respect now but there is further to go in sculpting, layering or articulating the top of the tallest building.

2.5 The approach of a loggia could work. This could sit within a frame carried upwards from the elevation below.

2.6 Whatever approach is taken, the design of the block should be appropriate to its apparent weight and scale. The visual separation of facade from frame is risky in this regard: a brick veil can look flimsy if discontinuous. It is wise to establish the geometry of the block firmly, but then to break into it judiciously.

### 3. Intermediate and perimeter blocks

3.1 The intermediate blocks are fine in height and scale, but the depth of plan is a concern and the floor plans will require careful consideration. Those elements that are extrusions of a larger block may be challenging in terms of depth of plan, especially if single aspect.

3.2 While the perimeter blocks work well in responding to the scale of the streets they address, their juxtaposition with the intermediate blocks behind is awkward. The mansard roofs on the perimeter blocks close to the flat roofs behind are uncomfortable. The connections between the perimeter and intermediate blocks feel contrived and undermine the integrity of both.

3.3 The pair of perimeter blocks on Park Road could and should be different from the pair on Lyndhurst Road without abandoning the principle of a family of blocks. The two roads offer different contexts: Park Road is residential and quiet while Lyndhurst Road (though residential) is a busy route.

## 4. The north–eastern corner

4.1 The option of removing the eastern perimeter block on Lyndhurst Road was put forward but on balance the panel prefers to retain this to maintain a lower scale on the street. The western block is then paired with a consistent street edge; and the family relationship with Park Road is retained. Parking at this point is better concealed from the street as far as possible.

4.2 The pressure reduction station at the north east corner is owned by a utility and outside the developer's control. We encourage further discussion with the utility about the extent of land that has to be associated with it and how it is accessed by the utility. Some alleviation of its impact on the scheme may ensue. Careful planting and screening in this area could minimise its visual impact without impeding access.

4.3 It follows that the scheme cannot celebrate the corner as might be wished but at least the boundary treatment can be handled creatively to make the corner as positive as it can be. A flint wall, at least as a datum with other material above, would lend strength to the corner and suit the material context. A decorative metalwork screen on the wall – public art – could upgrade a weak corner into a feature of the scheme.

## 5. Spaces

5.1 The panel was encouraged by the landscape design approach, now seen in detail. The green garden character is fine in principle, as is the aim to provide a rich variety of spaces with distinctive identities which can be used in multiple ways by both the public and residents.

5.2 Bearing in mind that amenity space is not generous, the outdoor spaces at ground level need to be exploited to be more useful for residents.

5.3 The use of some roofs for gardens or sitting areas should be considered again. The lower block to the east in particular seems well suited to having roof gardens.

5.4 Servicing/parking areas appear to cater for residents' parking but with little or no provision for short-term stopping. Traffic will be not only refuse/recycling and emergency vehicle but also deliveries, taxis, picking up/dropping off etc. and some lay-bys might be helpful.

## 6. Routes

6.1 The permeability of the scheme is commendable. The public routes through the site will help it to integrate with surrounding established and future development. The scheme will improve access to the town centre for pedestrians and cyclists, contributing to the Council's cycling and walking improvement plan.

6.2 The axis on the portico of St Paul's Church is an imaginative contribution both to the scheme and the town. The axis is more than a visual device – it will connect the development with the heart of the town functionally as well, assuming access across the Waitrose site.

6.3 It is conceivable that better use will one day be made of the store's surface car park, even if the whole site is not redeveloped. We are glad to hear that Waitrose accept in principle a connection with their site pending redevelopment.

6.4 A pedestrian route cutting off the corner between Park Road and Lyndhurst Road is welcome. A desire line could also be southbound and the possibility of a route over the southern boundary should continue to be pursued and provided for in the layout.

6.5 The pedestrian entrance on Park Road is over-scaled for its purpose and could be reduced. The numbers likely to use it, we suspect, will not be huge and the entrance on Lyndhurst Road is likely to be more important. This could allow more generous open space for residents.

## 7. Edges

7.1 The panel was reassured by the detailed consideration being given to the western edge of the scheme.

7.2 The relationship to 83 Park Road was also discussed and the need to mitigate noise was acknowledged.

## 8. Energy strategy

8.1 The approach to energy efficiency was not discussed in great detail at this review. Our guidance is that at the planning application stage the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables in order to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

8.2 The site has not yet been remediated. The developer has good experience of developing similar sites elsewhere, but the capping of on-site contamination, or the disposal of contaminated material elsewhere have sustainability implications that should be factored into the scheme's environmental performance overall.

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LIZARD
Landscape Design and Ecology

# ECOLOGICAL IMPACT ASSESSMENT

## Land At Former Gasworks site, Park Road, Worthing, West Sussex

On behalf of St William Homes LLP

| | |
|---|---|
| Prepared by | CF |
| Checked by | GS |
| Date | July 2021 |
| Project Reference | LLD2114 |
| Revision | 04 |

# Contents




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**SUMMARY**

Lizard Landscape Design and Ecology has been commissioned by St William Homes LLP to undertake an Ecological Impact Assessment (EcIA) of Land at Former Gasworks Site, Park Road, Worthing, West Sussex (*Grid Reference: TQ 152 029 – hereafter referred to as 'the site'*). The habitat appraisal survey was undertaken on 21st October 2020, to assess the existing ecological resources of the site, to highlight any potential ecological constraints and opportunities to inform scheme design, and to highlight the need for any further work prior to the submission of a planning application.

The site covers an area of c. 1.1ha and consists of an irregular shaped plot within an urbanised area of central Worthing associated with the former gasworks. The existing habitats found throughout the site are of broad low ecological value and offer limited potential to support protected or notable species, although scrub, trees and flat roofs offer the potential to support breeding birds during the nesting season and therefore, removal / demolition should be undertaken outside the main bird nesting season (given to run March – August inclusive) or following inspection from a suitably qualified ecologist. No further phase 2 survey work is required prior to the submission of planning and no international designated sites were identified from within a potential zone of influence of the development. Therefore, further investigation into the need for a Habitats Regulation Assessment will not be required.

Proposals will result in a significant betterment to the ecological value of the site, resulting in a Biodiversity Net Gain of 726% in Habitat units and 210% in Hedgerow Units and provide new nesting habitats 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.

An appropriate lighting strategy is to be provided which is sensitive to the potential presence of bats, which could be secured through an appropriately worded planning condition. No constraints have been recorded which would preclude the provision of the scheme, which will provide enhancement in line with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021) and be fully compliant with local and national planning policy.

## 1.0 INTRODUCTION

1.1 Lizard Landscape Design and Ecology has been commissioned by St William Homes LLP to undertake an Ecological Impact Assessment of Land at Former Gasworks Site, Park Road, Worthing, West Sussex (*Grid Reference: TQ 152 029 – hereafter referred to as 'the site'*).

1.2 An initial habitat appraisal survey was undertaken on 21st October 2020 to appraise the existing ecological resource within the land and the surrounding area. The habitat appraisal survey comprised a baseline survey conforming broadly to *the JNCC Extended Phase 1 Habitat Survey methodology* (JNCC, 2010), to identify and map existing habitats. In addition, a protected species assessment was undertaken to identify the potential for European and nationally protected species to be present within and adjacent to the site.

1.3 The field survey data and analysis contained in this report was undertaken and prepared by Caleb Fry (*ACIEEM, Project Ecologist; Lizard Landscape Design and Ecology*). The report has been reviewed by George Sayer (*MCIEEM, Senior Ecologist; Lizard Landscape Design and Ecology*).

### *Site Information*

1.4 The site covers an area of c. 1.1ha and consists of an irregular shaped plot within a highly sustainable town centre location. The site consists of hardstanding used for access and parking, buildings used as offices and storage facilities, bare ground associated with the former gasworks, scattered ruderal vegetation, scrub and a small treeline. To the east lies Park Road, to the north lies Lyndhurst Road, to the south lies the Kings Mews estate and to the west lies Waitrose supermarket. No ecological designations cover any part of the site and the site is detailed in the existing Core Strategy (Worthing Borough Council, 2011) as an 'Area of Change'.

### *Surrounding Landscape*

1.5 The site is within urbanised central Worthing. The surrounds comprise of residential housing, business units and the general infrastructure of Worthing. Worthing hospital is located c. 200m north-east of site, Worthing Assembly Hall is located c. 420m west by north-west of site, and Worthing Pier lies c. 560m south-west of site.

***Development Proposals***

1.6 It is understood that proposals are for the demolition of the existing structures, partial removal of boundary walls and the construction of 209 residential apartments across 5 blocks ranging in height from 3-7 storeys, associated access, parking, open space and landscaping proposals.

## 2.0 SCOPE OF THE SURVEY

2.1 The aim of the Ecological Impact Assessment has been:

- Establish baseline ecological conditions at the Site.
- Determine the importance of ecological features which could be affected by the proposed scheme.
- Identify any likely significant effects of the proposed scheme on important ecological features.
- Set out any measures necessary to effectively avoid or mitigate likely significant effects, and identify residual impacts.
- Identify any compensation measures required to offset residual impacts.
- Set out potential ecological enhancement measures that could be delivered by the proposed scheme.
- Confirm how proposed mitigation, compensation and enhancement measures could be secured.
- Provide sufficient information to determine whether the project accords with relevant nature conservation policies and legislation, and where appropriate, to allow conditions or obligations to be proposed by the relevant authority.

# 3.0 METHODOLOGY

## 3.1 Desk Study

3.1.1 The Multi-Agency Geographical Information Centre (*MAGIC*) was consulted for information regarding priority habitats, statutory designated sites and permitted European Protected Species Licences (EPSL's) within a potential zone of influence of the development site. Due to the industrial setting of the site a data search from the local biological records centre would be unlikely to provide information essential to inform the assessment and so has not been provided. This is an approach in line with current guidance (CIEEM, 2020).

3.1.2 In accordance with Natural England's GCN Mitigation Guidelines (English Nature, 2001) a desktop search was undertaken to identify ponds within 500m and 250m of the site, which may have the potential to support breeding great crested newts (GCN) *Triturus cristatus,* using Ordnance Survey mapping, the *MAGIC* database and aerial photography.

## 3.2 Site Visit

3.2.1 A habitat appraisal survey was undertaken on 21st October 2020 and the site subjected to an ecology survey using guidelines set out in the *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit* (JNCC, 2010). This has resulted in a Site Habitat Plan *(Figure No. 01)* and Species Lists for Habitat Parcels (*Table No. 04).*

3.2.2 Habitats within the site were classified and the presence, or potential presence, of certain protected and/or notable species of flora and fauna were identified. This involved identifying features that may be used by protected species, potential foraging areas and other signs of use.

3.2.4 The results are summarised and accompanied in large part by photographic evidence contained in *Appendix A – Site Photographs.* Recommendations for further investigation and survey are made herein where necessary.

### 3.3 Evaluation and Assessment

3.3.1 Ecological features are identified, evaluated and assessed with due consideration to the CIEEM Guidelines (CIEEM, 2018).

3.3.2 Wherever possible potential adverse effects will be avoided by mitigation embedded in scheme design, as this gives increased certainty over successful delivery and ensures adhesion to the 'Mitigation Hierarchy' (CIEEM, 2018).

### 3.4 Great Crested Newt Habitat Suitability Index (HSI) Assessment

3.4.1 Subsequent to the desk study which identified potential ponds within a dispersible distance of the site for GCN, all ponds and waterbodies within 250m of the site were investigated for their potential to support GCN where access allowed. This entailed calculating a Habitat Suitability Index (HSI) for all waterbodies, based on standard methodology (Oldham *et al,* 2000). The HSI uses ten suitability indices known to affect the likelihood of GCN being present. Waterbodies are assigned a score between 0 and 1, according to the published scoring system, with 0 indicating the poorest habitat and 1 indicating optimal habitat.

### 3.5 Preliminary Bat Roost Assessment

3.5.1 A Preliminary Bat Roost Assessment was undertaken on 21st October 2020 by an experienced bat surveyor who undertook a ground-level assessment of all trees and buildings within the proposed development site.

3.5.2 The bat surveyor assessed the existing buildings visually and searched for evidence such as:

- Grease Marks;
- Urine Stains;
- Bat Droppings;
- Feeding Remains;
- Dead or Live Bats.

3.5.3 Trees were visually identified from the ground, using binoculars where necessary, for features that could be used by bats such as:

- Woodpecker Holes;
- Knot Holes;
- Tear-outs;
- Flush Cuts;
- Double Leaders.

3.5.4 Once features had been assessed the trees were then categorised in accordance with *Table 4.1 Bat Surveys for Professional Ecologists; Good Practice Guidelines (Collins, 2016):*

***Table No. 01 – Bat Roost Categorisation Criteria***

| ***Category*** | ***Building*** | ***Tree*** |
|---|---|---|
| ***`Negligible`*** | No suitable features identified. | No suitable features identified. |
| ***`Low`*** | A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by large numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). | Tree of sufficient size and age to support bat roost features; but with none identified from the ground, or with only very limited roosting potential. |
| ***`Moderate`*** | A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only). | |
| ***`High`*** | A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. | |

3.5.5 The surrounding habitat within and directly adjacent to the site was assessed for its suitability to support foraging and commuting bats which may influence the likelihood of bats roosting within on-site trees and buildings.

### 3.6 Biodiversity Net Gain Assessment

3.6.1 A Biodiversity Net Gain (BNG) assessment was conducted to calculate the proposed change in biodiversity units across the site resulting from proposals, to determine the extent to which development could benefit / detriment biodiversity interests. The calculation is based on the current extent, distinctiveness and condition of habitats on site, compared with the extent, distinctiveness and condition of proposed habitats. The BNG assessment uses the latest DEFRA 2.0 metric (Natural England, 2019) in accordance with current guidance methodology (Crosher *et al*, 2019). The extent of existing habitats is calculated using aerial imagery, whereas proposed habitats are calculated based on mapping provided by the *Illustrative Landscape Masterplan* (Lizard Landscape Design and Ecology, 2021). The distinctiveness of habitats was assessed using the *UK Habitat Classification system* (Butcher *et al*, 2020) and the condition of habitats assessed in accordance with the *Technical Supplement* (Crosher *et al*, 2019).

### 3.6 Survey Constraints / Considerations

3.6.1 Due to the field survey consisting of only one site visit, an ecological survey represents a ‘snapshot’ in time of the ecological condition of the site and certain species, particularly flowering plants, may not have been visible or may have been otherwise inconspicuous at the time of the survey and hence overlooked. However, an ecological assessment is not a detailed floral inventory, and the potential oversight of some species is not a constraint for this broad assessment of habitats and their potential to support protected species.

3.6.2 Due to access restrictions it was not possible to conduct an internal bat roost assessment of all the structures on site, and therefore there is the potential that evidence of bats could have been missed. However, in many situations it is not possible to inspect all potential roosting locations and an absence of bat evidence does not equate to evidence of bat absence. Where potential ingress opportunities are identified, a precautionary approach to the evaluation of the likely suitability of the structure has been made.

3.6.3 Due to imprecisions associated with mapping the extent of existing and proposed habitats using aerial imagery and landscaping proposals based on desktop study, the Biodiversity Net Gain (BNG) assessment cannot conclusively guarantee that the extent of habitats is exactly quantified, although due care and attention has been given to ensure that the accuracy of the assessment is not misleading and is appropriate for the scale of development proposed.

# 4.0 RESULTS

## 4.1 Desk Study

***Statutory Protected Sites***

4.1.1 The following potential zones of influence have been used when identifying designated sites in the local area: national statutory designated sites including Local Nature Reserves (LNRs) and Sites of Special Scientific Interest (SSSIs) within a 2.0km radius of the site, and international statutory designated sites including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsars (Wetlands of International Importance) within a 10.0km radius of the site.

4.1.2 No results for national or international statutory designated sites were returned from within the search area.

***Non-Statutory Protected Areas***

4.1.3 *Sites of Nature Conservation Importance* (*SNCIs*) are designations applied to the most important non-statutory nature conservation sites. They are recognised by the *National Planning Policy Framework (2019)* and as such are material considerations when assessing planning applications.

4.1.4 No results for SNCIs were returned from within the search area.

***Pond Study***

4.1.5 No ponds were located within a 500m radius of the site based on the desk study. A small ephemeral pond was found on site during the initial walkover survey.

## 4.2 Habitats

4.2.1 Within 2.0km of the site there are priority habitats of *Coastal Vegetated Shingle* and *Deciduous Woodland.* However, neither exist on or directly adjacent to the site.

4.2.2 Habitats within the site include:

- *Hardstanding, Buildings & Bare Ground*
- *Scrub*
- *Ephemeral / Short Perennial*
- *Scattered Ruderal*
- *Trees*
- *Standing Water*

*Hardstanding & Buildings*

4.2.3 The majority of the site, incorporating the access and parking are covered by hardstanding and as such are of **Negligible** ecological value. The buildings on site are of a modern brick and mortar or sheet metal fabrication and as such are of **Negligible** ecological value. Bare ground covers the area of site associated with the former gasworks storage area and as such is of **Negligible** ecological value.

*Scrub*

4.2.4 An area of scrub (c. 250m$^2$) is present towards the north-west of site between the wall which bounds the site against Lyndhurst Road and the hardstanding. Successional species are found here which have colonised the area due to lack of management after closure of the gasworks. Non-native butterfly bush *Buddleja ssp.* is abundant in this area, alongside ivy *Hedera helix*, which is frequently found and bramble *Rubus fruticosus* which is occasionally noted. Several sycamore *Acer pseudoplatanus* saplings have colonised the western aspect of the scrub and a single oak *Quercus robur* seedling was found. The ground flora of this area is typical of successional scrub in urbanised areas and includes stinging nettle *Urtica dioica* and broad-leaved dock *Rumex obtusifolius.* The scrub is likely to be of **Site** value.

*Ephemeral / Short Perennial*

4.2.5 The area which bounds the southern aspect of the scrub includes colonising species which have taken advantage of the loose substrate. Dandelion *Taraxicum officinalis* and greater plantain *Plantago major* are frequently found and traveller's joy *Clematis vitalba,* mind-your-own-business *Soleirolia soleirolii* and petty spurge *Euphorbia peplus* were rarely noted and only found in discrete areas. The ephemeral / short perennial vegetation is valuable at the **Site** level.

*Scattered Ruderal*

4.2.6 Ruderals are scattered throughout the site, pushing up through cracks in hardstanding and on less disturbed edges of the site. Canadian fleabane *Erigeron canadensis* and bristly oxtongue *Helminthotheca echiodes* are abundant. Greater plantain, ribwort plantain *Plantago lanceolata* and dandelions are occasionally noted, nipplewort *Lapsana communis* and purple toadflax *Linaria purpurea* were rarely encountered. Around the standing water towards the north of the site pendulous sedge *Carex pendula* and woody nightshade *Solanum dulcamara* were observed. The scattered ruderal vegetation is valuable at the **Site** level.

*Trees*

4.2.7 Towards the south-east of the site a treeline of sycamore and elder *Sambucus nigra* are present. Most of these trees are present along the southern aspect, where c. 12 young sycamore trees are present amongst c. 4 elder shrubs. This treeline extends along the eastern aspect of site behind Building B3, where 4 more elder shrubs are present. The trees are hemmed in between the hardstanding of the site and the wall, which is likely to limit their effective life-span and they are unlikely to be above **Site** level value.

*Standing Water*

4.2.8 At the time of survey standing water was present throughout the site due to a downpour shortly before the survey. Only one of the pools of water hosted flora which suggests it holds water for any extended period of time, although in summer it is likely to dry up and therefore is probably ephemeral. This pond is present towards the centre of the north of site, within the former gasworks area. The bottom of the pool was obscured by dense blanket weed *Spirogyra sspp.* The standing water is likely to be of **Site** level value.

## 4.3 Protected Species Assessment

***Amphibians***

*Desk Study*

4.3.1 Great crested newts (GCN) and their resting / breeding sites are protected under *The Conservation of Habitats and Species Regulations 2017 and The Wildlife and Countryside Act 1981 (as amended).* No record for EPSL's in relation to GCN was returned within 2km of the site.

*Site Assessment*

4.3.2 The standing water on site was assessed using the Habitat Suitability Index assessment methodology and was determined to be of 'poor' suitability for GCN due to its small size, annual drying, bad water quality, lack of other suitable breeding ponds in the area, absence of suitable terrestrial habitat and dense blanket weed cover, as summarised below:

***Table No. 02 – GCN HSI Assessment Results***

| Suitability Indices | P1 |
|---|---|
| **Location** | Zone A |
| **Pond Area** | <50m$^2$ |
| **Pond Drying** | Dries annually |
| **Water Quality** | Bad |
| **Shade** | 0-60% |
| **Waterfowl** | Absent |
| **Fish** | Absent |
| **Ponds within 1km** | 0 |
| **Terrestrial Habitat** | None |
| **Macrophytes** | <1% |
| **HSI Score** | 0.14 |
| **Suitability** | **Poor** |

4.3.3 The scrub on site is of some limited suitability to support GCN during their terrestrial phase, but is isolated from larger areas of suitable habitat, and limited in extent. Overall, amphibians have **Negligible** potential to be present, and their potential to occur will not be considered further in this report.

***Reptiles***

*Desk Study*

4.3.4 Populations of common and widespread reptiles, such as grass snake *Natrix helvetica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* are likely to exist within areas of suitable habitat throughout the landscape. All species of UK reptile are protected against reckless or intentional killing or injury under *The Wildlife and Countryside Act 1981 (as amended).*

*Site Assessment*

4.3.5 Although the scrub at the north of site could offer cover opportunities for reptiles, and basking opportunities are present throughout areas of open ground on site, owing to the scrub's isolated and urbanised location, between a tall wall on its northern aspect and vast areas of open ground on its eastern, western and southern aspects, reptiles are unlikely to have colonised the site. Furthermore, the area of scrub is too small in extent, c. 250m$^2$, to support any considerable populations of reptiles in perpetuity. Overall, the potential of the site to support reptiles is **Negligible**, and their potential to occur will not be considered further in this report.

***Bats***

*Desk Study*

4.3.6 No EPS licence records for bats were returned within the 2km search area. However, bats are likely to exist within suitable habitat throughout the landscape. All species of bat and their roosts are protected under *Regulation 41* of the *Conservation of Habitats and Species Regulations 2017* and *Section 9* of the *Wildlife and Countryside Act 1981*. It is an offence to intentionally or recklessly kill, injure or handle a bat, to possess a bat (whether live or dead) or disturb a roosting bat. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not. The wider surrounds are urbanised, with scattered green spaces and gardens, and no obvious commuting routes.

*Site Assessment - Roosting*

4.3.7 All of the buildings on site were assessed for their potential to support roosting bats. Results are summarised below (for reference to building numbers see Site Habitats Plan in Figure No. 01):

***Table No. 03 – Building Assessment***

| Building No. | Description | Suitability |
|---|---|---|
| **B1** | B1 is a small service building, covering an area of c. 15m$^2$ and located towards the east of site. The building is of a modern red brick construction with a flat roof. Lead flashing of the roof is flush with the brick walls, resulting in no suitable roosting features for bats. | ***Negligible*** |
| **B2** | B2 is an irregular shaped medium sized single storey building with a flat roof. The building covers an area of c. 530m$^2$. The roof is affixed flush to the walls of the building with plastic cladding so that no crevices are present, and no suitable roosting features were observed. | ***Negligible*** |
| **B3** | B3 is a rectangular based corrugated metal building with a simple corrugated metal gable roof. The building covers an area of c. 560m$^2$. Where the walls of the building meet the roof lead flashing is present, which creates large gaps between the flashing and the corrugated metal walls. However, these gaps are too large and exposed to be used by bats and no suitable potential roosting features were observed. | ***Negligible*** |
| **B4** | B4 is located toward the east of site. The building is of a modern red brick construction with a flat roof. The building covers an area of c. 145m$^2$. Where the roof meets the walls flashing is present, creating flush joins. No potential roosting features were observed. | ***Negligible*** |

4.3.8 All of the trees on site were assessed for their potential to support roosting bats. No suitable potential roosting features were observed as the trees on site are too young and yet to reach a stage of senescence whereby suitable roosting features would be likely to be present.

*Site Assessment – Commuting and Foraging*

4.3.9 It is likely that the scrub, trees and scattered ruderal vegetation support some limited assemblages of invertebrate forage for bats. However, most of the site is not covered by flora and therefore of no value to bats. Furthermore, the site is lit at night by security lighting and the general light spill of wider Worthing, making it unsuitable for all but the least light averse and most opportunistic of bats species such as common pipistrelle *Pipistrellus pipistrelle*, which may utilise discrete areas of the site, such as the scrub, occasionally. The site offers no obvious commuting routes and overall is likely to be of **Negligible** value to commuting bats, with some **Low** potential to support foraging bats.

***Dormouse***

*Desk Study*

4.3.10 No EPS licence records were returned for hazel dormice *Muscardinus avellanarius* within 2km of the site. Hazel Dormice are protected under *The Wildlife and Countryside Act 1981 (as amended) through their inclusion on Schedule 5 and The Conservation of Habitats and Species Regulations 2017* making it an offence to intentionally kill, injure or take a dormouse, to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by dormice, or to intentionally or recklessly disturb a dormouse while it is occupying a structure or place which is used for that purpose.

*Site Assessment*

4.3.11 Dormice require undisturbed areas of arboreal habitat to persist in the landscape. As no such habitat is present on site, and the site is not connected to any such habitat, there is **Negligible** potential for dormice to be found on site, and their potential to occur will not be considered further in this report.

***Badger***

4.3.12 Badgers *Meles meles* are a common and widespread species but are generally not found in urban areas. The majority of the site is covered by hardstanding and bare ground which offers **Negligible** opportunities to support foraging, commuting or sett building badgers. The scrub does offer suitable habitat for badgers, but it is too small in extent and isolated from larger areas of suitable habitat to be utilised. No evidence of use by badgers was identified during the initial walkover and badgers are not likely to use the site. Therefore, their potential to occur will not be considered further in this report.

***Water Vole***

4.3.13 Water vole require reedbed habitat to persist in a landscape. As there is no such habitat on site, or within a dispersible range of the site based on aerial mapping, their potential to occur is severely limited and the site is determined to be of **Negligible** suitability for the species. Their potential to occur will not be considered further in this report.

***Birds***

*Desk Study*

4.3.14 Wild birds are protected under the *Wildlife and Countryside Act (1981)(as amended),* making it an offence to intentionally kill, injure or take any wild bird, to intentionally take, damage or destroy the egg of any wild bird, or to intentionally or recklessly disturb any wild birds listed on Schedule 1 while it is nest building, or at a nest containing eggs or young.

*Site Assessment*

4.3.15 During the initial walkover survey magpie *Pica pica*, long-tailed tit *Aegithalos caudatus* and herring gull *Larus argentatus,* a red list species (Eaton *et* al, 2015) were observed on site. Some limited nesting and foraging potential is presented by the scrub and trees on site, and some gulls are known to nest on flat roofs. Overall, the potential for the site to support schedule 1 birds is negligible. The habitats on site are likely to be of **Site** value to common nesting birds. Measures to ensure the protection of nesting birds are discussed herein.

***Invertebrates***

*Site Assessment*

4.3.16 Although some brownfield sites are associated with notable invertebrate assemblages, the habitats on site do not offer the diversity of micro-habitats to support any unusual guilds of species. However, the flora of site is likely to be of some limited value to invertebrates, e.g. butterfly bush is known to provide a source of nectar well into the later months of the year. Overall, the habitats on site are likely to be of **Site** value to invertebrates.

***Others***

4.3.17 No suitable habitat for any other protected species was recorded on site.

# 5.0 IMPACT ASSESSMENT

## 5.1 Habitats

*Potential Impacts*

5.1.1 The majority of the development will take place within existing areas of hardstanding, buildings and bare ground habitats, which are of negligible ecological value, and result in the loss of small areas of scrub, ruderal, ephemeral, tree and standing water habitats of low ecological value. Proposals include the provision of a variety of soft landscaping components, including areas of introduced shrubs, street trees, vegetated and unvegetated gardens, ornamental non-native hedgerows, and brown roofs. Brown roofs will comprise a mixture of rubble or gravel taken from the area and will be left to establish naturally through succession. Proposals are for the removal of existing low ecological value habitats and for the creation of new habitats of higher ecological value. In the absence of mitigation proposals are likely to result in improvements to the ecological value of the site, significant at the **Local** level.

*Avoidance, Mitigation and Compensation*

5.1.2 The existing scrub, ruderal, ephemeral, tree and standing water habitats of low ecological value will be removed and compensated through the provision of a variety of soft landscaping components, as aforementioned. The provision of these soft landscaping components will result in a significant betterment, compared to existing site levels, and therefore, will serve to enhance the ecological value of the site, as well as compensate for the loss of small areas of low ecological value habitat. These proposed habitats will require minimal intervention management.

*Residual Effects*

5.1.3 Overall, proposals are likely to result in improvements to the ecological value of the site, providing new habitats for wildlife, significant at the **Local** level, with no avoidance or mitigation measures required for any existing habitats scheduled for removal. Proposals accord with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021)

## 5.2 Biodiversity Net Gain Assessment

5.2.1 The Biodiversity Net Gain (BNG) assessment concluded that the baseline ecological value of the site is 0.44 Habitat units and 0.14 Hedgerow units, primarily owing to the extent of hardstanding and bare ground habitats, and low ecological value scrub and ruderal habitats. Proposals are to result in 3.17 Habitat units and 0.43 Hedgerow units across the site, owing to the mixture of brown roofs, introduced shrub and mosaic of developed land / natural surface. This represents a Biodiversity Net Gain of 726% in Habitat units and 210% in Hedgerow Units. This value does not take into account the provision of bat or bird boxes, and conclusively demonstrates that proposals will result in an ecological enhancement to the site, in line with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021).

## 5.2 Nature Conservation Designations

5.2.1 As the site is not within the zone of influence of any statutory or non-statutory designated sites no further investigation is required.

## 5.3 Protected Species

### *Bats*

*Potential Impacts*

5.3.1 Although the site was determined to offer negligible potential to support roosting and commuting bats, it is likely that bats are in the area and there is potential for them to forage over scrub, ruderal and tree habitats on site occasionally. The site is currently subject to nocturnal lighting associated with the existing buildings and the surrounding area and is therefore likely to be used only occasionally by the least light averse of species. Proposal will increase soft landscaping components across the site, likely to result in greater potential foraging value of the site for bats. Furthermore, four bat boxes, suitable for a variety of species will be incorporated in various appropriate locations across the site. However, in the absence of mitigation, works could increase the nocturnal illumination of the site and the surrounding area, decreasing the foraging and commuting value of the site and wider area for urban bat species, resulting in adverse impacts to foraging and commuting bats, significant at the **Site** level.

*Avoidance, Mitigation and Compensation*

5.3.2 As the site is already lit at night, providing any proposed nocturnal illumination during construction and operation does not exceed the current nocturnal lux levels, proposed nocturnal illumination is not likely to have a significant impact upon the foraging or commuting value of the site (or the roosting value of the surrounding area) for bats, compared to current nocturnal lux levels. Should any further external lighting be proposed any nocturnal lighting scheme should consider the potential for bats to exist in and use the area, and accord with best practice guidance (BCT & ILP, 2018). There is the scope for the scheme to provide a betterment compared to existing nocturnal light levels and this should be investigated by exploring the use of PIR and downward facing lights with hoods / cowls wherever practicable. The soft landscaping proposals will serve to enhance the potential commuting and foraging value of the site for bats (as well as other nocturnal wildlife). Four bat roosting boxes, suitable for a variety of common species, will be incorporated in various appropriate locations across the site.

*Residual Effects*

5.3.3 Enhancements have been built into the scheme design and all proposals will accord with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021) resulting in gains for bats, significant at the **Site** level.

***Birds***

*Potential Impacts*

5.3.4 In the absence of mitigation, proposals could result in the damage / destruction of an active bird nest which would constitute an offence under the *Wildlife and Countryside Act (1981)(as amended*). However, proposals are to incorporate four swift boxes and fifteen bird boxes of broad nesting suitability in various suitable locations across the site, to increase the nesting potential of the site and support declining species. Proposals will result in the loss of scrub nesting habitat. However, soft landscaping proposals are likely to increase the foraging and nesting value of the site for common passerine species.

*Avoidance, Mitigation and Compensation*

5.3.5 The removal of any suitable nesting habitat, e.g. trees, scrub and the existing flat roof buildings, should be undertaken outside the main bird nesting season (given to run March-August inclusive). Where this is not possible removal should take place following inspection by a suitability qualified ecologist no less than 24 hours prior to removal, to ensure no active nests are present. Should active nests be identified it will be necessary to cordon off the area and cease works in that area until the birds have fledged. A relatively small area of scrub nesting / foraging habitat will be lost, which will be adequately mitigated by the provision of trees, hedgerows and introduced planting included in the soft landscaping proposals.

*Residual Effects*

5.3.6 Given the implementation of the simple avoidance measures and precautionary working practice outlined above, works will avoid committing an offence. Furthermore, proposals will result in net gains for birds, significant at the **Site** level, and will accord with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021).

***Summary of Recommendations***

5.3.7 A summary of recommendations is as follows:

- Provision of a lighting strategy sympathetic to bats, in line with current guidance (BCT & ILP, 2018)
- Removal of nesting habitat outside the main bird nesting season (given to run March-August inclusive) or following inspection from a suitably qualified ecologist.

5.3.8 Recommendations could be secured through an appropriately worded planning condition.

## 6.0 CONCLUSIONS

6.1 The existing habitats found throughout the site are of broad low ecological value and offer limited potential to support protected or notable species, although scrub, trees and flat roofs offer the potential to support breeding birds during the nesting season and therefore, demolition should be undertaken outside the main bird nesting season (given to run March – August inclusive) or following inspection from a suitably qualified ecologist. No further phase 2 survey work is required prior to application and no international designated sites were identified from within a potential zone of influence of the development. Therefore, further investigation into the need for a Habitats Regulation Assessment will not be required.

6.2 Proposals will result in a significant betterment to the ecological value of the site, resulting in 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.

6.3 No constraints have been recorded which would preclude the provision of the scheme, providing an appropriate lighting strategy is provided, which is sensitive to the potential presence of bats and could be secured through an appropriately worded planning condition. The scheme will provide enhancements in line with Strategic Objective 1 & Policy 13 of the adopted Worthing Core Strategy (Worthing Borough Council, 2011) and Submission Draft Worthing Local Plan policy DM18 - Biodiversity part b. (Worthing Borough Council, 2021) and be fully compliant with local and national planning policy.

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***Table No. 04 – Species List for Habitat Parcels***

***Scrub***

| ***Common Name*** | ***Scientific Name*** | ***DAFOR*** |
|---|---|---|
| Butterfly bush | *Buddleja ssp.* | ***A*** |
| Ivy | *Hedera helix* | ***F*** |
| Bramble | *Rubus fruticosus* | ***O*** |
| Sycamore | *Acer pseudoplatanus* | ***O*** |
| Oak | *Quercus robur* | ***R*** |
| Stinging nettle | *Urtica dioica* | ***O*** |
| Broad-leaved dock | *Rumux obtusifoloius* | ***O*** |

***Ephemeral / Short Perennial***

| ***Common Name*** | ***Scientific Name*** | ***DAFOR*** |
|---|---|---|
| Dandelion | *Taraxicum officinalis* | ***F*** |
| Greater plantain | *Plantago major* | ***F*** |
| Traveller's joy | *Clematis vitalba* | ***R*** |
| Mind-your-own-business | *Soleirolia soleirolii* | ***R*** |
| Petty spurge | *Euphorbia peplus* | ***R*** |

***Scattered Ruderal***

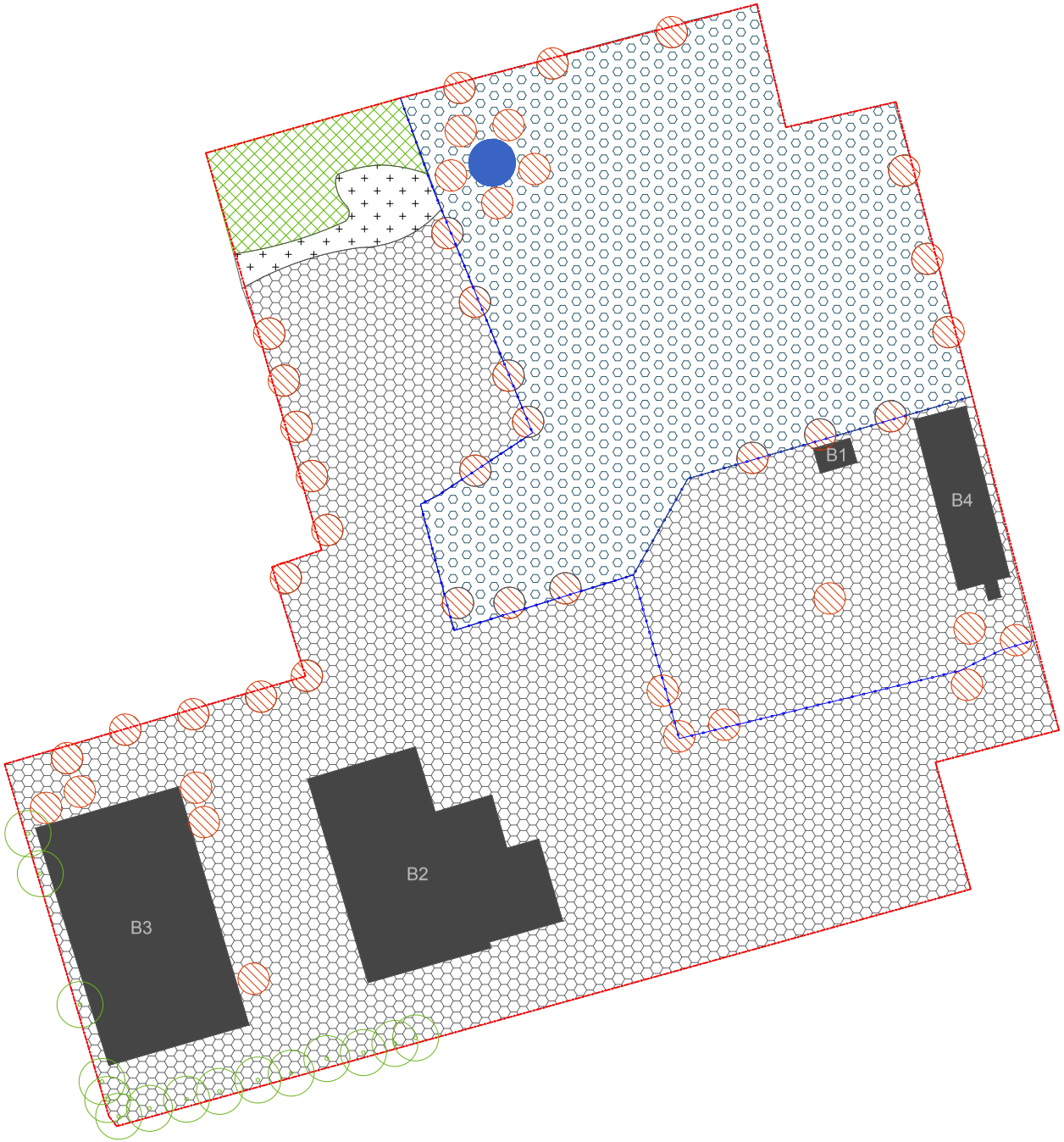
| ***Common Name*** | ***Scientific Name*** | ***DAFOR*** |
|---|---|---|
| Canadian fleabane | *Erigeron canadensis* | ***F*** |
| Bristly oxtongue | *Helminthotheca echiodes* | ***F*** |
| Greater plantain | *Plantago major* | ***O*** |
| Ribwort plantain | *Plantago lanceolata* | ***O*** |
| Dandelion | *Taraxicum officianles* | ***O*** |
| Nipplewort | *Lapsana communis* | ***R*** |
| Purple toadflax | *Linaria purpurea* | ***R*** |
| Pendulous sedge | *Carex pendula* | ***R*** |
| Woody nightshade | *Solanum dulcamara* | *R* |

***Trees***

| ***Common Name*** | ***Scientific Name*** | ***DAFOR*** |
|---|---|---|
| Sycamore | *Acer pseduoplatanus* | ***A*** |
| Elder | *Sambucus nigra* | ***F*** |

***D – Dominant; A – Abundant; F – Frequent; O – Occasional; R – Rare; L – Locally***

**Figure No. 01 - Site Habitat Plan**




## Legend

- Site Boundary.
- Buildings.
- B1 Building Number.
- Fence.
- Bare/Hard Ground
- Hardstanding.
- Ephemeral / Short Perennial.
- Dense / Continuous Scrub.
- Scattered Ruderal
- Standing Water.
- Scattered Trees.

Notes: The original of this drawing was produced in colour - a monochrome copy should not be relied upon.

Habitat areas are indicative and for information only - please do not scale from this drawing.

Planning Issue

| Rev | Description | Date | Initials |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| 00 | Planning Issue | 26.06.21 | LB |

LIZARD Landscape Design and Ecology

Client: St William Homes LLP

Project Title and Location: Land at Former Gasworks Site, Worthing, West Sussex

Drawing Title: Figure No.1 - Site Habitat Plan

| Scale | Drawn | Approved | Date |
|---|---|---|---|
| 1:200@A0 | LB | JJ | 26.07.21 |

Drawing No: LLD2114-ECO-DWG-001

Revision: 01

N

Figure No.1- Site Habitat Plan
Land at Former Gasworks Site, Park Road, Worthing, West Sussex

**Appendix A – Site Photographs**

**Photograph No. 1 - Scrub at north-west corner of site**

**Photograph No. 2 - Building B4 of a modern red brick construction with flat roof and no observable potential roosting features**


**Photograph No. 3 - Building B1. Small and of red brick construction with no observable potential roosting features**

**Photograph No. 4 - Standing water in north east area of bare ground with balnket weed and other plants which indicate the pond holds water for prolonged periods of time, but is likely to be ephemeral.**

**Photograph No. 5 - Scattered ruderals pushing up through bare ground at the north-east of site**


**Photograph No. 6 - Car park and building B2, of modern red brick construction with flat roof and absence of potential roosting features**

**Photograph No. 7 - Building B1, corrugated metal building with no suitable roosting potential identified.**

**Photograph No. 8 - Treeline of sycamore and elder along the south-west of site**