

Worthing Planning Committee

Date:	Wednesday 9 March 2016
Time:	6:30pm
Venue:	Gordon Room, Stoke Abbott Road, Worthing

Committee Membership: Councillors Kevin Jenkins (Chairman), Vicky Vaughan (Vice-Chair), Noel Atkins, Edward Crouch, James Doyle, Diane Guest, Nigel Morgan, and Paul Yallop

NOTE:

Anyone wishing to speak at this meeting on a planning application before the Committee should register by telephone (01903 221006) or e-mail

heather.kingston@adur-worthing.gov.uk before noon on Tuesday 8 March 2016.

Agenda

Part A

1. Declarations of Interest / Substitute Members

Members and Officers must declare any disclosable pecuniary interests in relation to any business on the agenda. Declarations should also be made at any stage such an interest becomes apparent during the meeting.

If in doubt contact the Legal or Democratic Services representative for this meeting.

Members and Officers may seek advice upon any relevant interest from the Monitoring Officer prior to the meeting.

Any substitute members should declare their substitution.

2. Confirmation of Minutes

To approve the minutes of the Planning Committee meetings of the Committee held on Wednesday 10 February 2016, which have been emailed to Members.

3. Items Raised Under Urgency Provisions

To consider any items the Chair of the meeting considers urgent.

4. Planning Applications

To consider the reports by the Director for the Economy, attached as Item 4:-

- 4.1 18 Hayling Rise
- 4.2 Elston Lodge, 22-24 Selden Road
- 4.3 Builders Yard, North of 14 Highfield Road
- 4.4. Ground Floor Flat, 130 Rowlands Road
- 4.5 Recreation Ground Goring, Fernhurst Drive

5. Public Question Time

To receive any questions from Members of the public in accordance with Council procedure Rule 11.2.

(**Note:** Public Question Time will last for a maximum of 30 minutes)

6. Motion on Notice - High Salvington Mill

To consider the report by the Director for the Economy.

7. Worthing Local Plan – Issues and Options Consultation

To consider the report by the Director for the Economy.

Part B - Not for publication - Exempt Information Reports

None

Recording of this meeting

The Council will be voice recording the meeting, including public question time. The recording will be available on the Council's website as soon as practicable after the meeting. The Council will not be recording any discussions in Part B of the agenda (where the press and public have been excluded).

For Democratic Services enquiries relating to this meeting please contact:	For Legal Services enquiries relating to this meeting please contact:
Heather Kingston Democratic Services Officer 01903 221006 heather.kingston@adur-worthing.gov.uk	Caroline Perry Solicitor 01903 22 caroline.perry@adur-worthing.gov.uk

Duration of the Meeting: Four hours after the commencement of the meeting the Chairperson will adjourn the meeting to consider if it wishes to continue. A vote will be taken and a simple majority in favour will be necessary for the meeting to continue.

Report by the Director for Economy

Planning Applications

1

Application Number: AWDM/1849/15 Recommendation – APPROVE

Site: 18 Hayling Rise Worthing

Proposal: Ground floor infill extension and complete first floor extension with 1 dormer to south elevation, gable roof extension to west elevation and 4 roof lights to north elevation and gable roof extension to east elevation, new porch and raised patio.

2

Application Number: AWDM/1828/15 Recommendation – APPROVE

Site: Elton Lodge 22-24 Selden Road Worthing

Proposal: Change of use from residential care home (Use Class C2) to house in multiple occupation with 22 separate units and communal kitchen area on ground and first floors and external alterations.

3

Application Number: AWDM/1111/14 Recommendation – APPROVE

Site: Builders Yard North of 14 Highfield Road Worthing

Proposal: Continued use of premises for printers and allied office and storage and allied improvement works including retention of single storey side extension, replacement of existing attached front storage building with new flat roofed building, single storey extension, construction of new front garage and reconstruction of south boundary wall with new entrance gate.

4

Application Number: AWDM/1848/15 Recommendation – REFUSE

Site: Ground Floor Flat 130 Rowlands Road, Worthing

Proposal: Single storey rear extension

5

Application Number: AWDM/0063/16 Recommendation – APPROVE

Site: Recreation Ground Goring Fernhurst Drive Worthing West Sussex

**Proposal: 5 no. 10 metre high steel posts 10 metres apart; de-mountable
netting between posts**

Application Number: AWDM/1849/15

Recommendation – APPROVE

Site: 18 Hayling Rise Worthing

Proposal: Ground floor infill extension and complete first floor extension with 1 dormer to south elevation, gable roof extension to west elevation and 4 roof lights to north elevation and gable roof extension to east elevation, new porch and raised patio.

Applicant: Mr B Sahota

Ward: Salvington

Case Officer: Peter Devonport



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

The Site

The property is located in the mainly inter and early post war, attractive and leafy, low density residential suburb of High Salvington, on the lower southern slopes of the South Downs.

The site is triangular shaped and sits on the corner of Hayling Rise which runs north/south and Foxley Lane which is oriented west/east. At this point the ground slopes in both these directions.

The property dates back to 1959 and is a very modest, detached, two bed bungalow (55 sq ms gross internal floor area) with kitchen/diner/lounge and until recently a small very lightweight rear (east) lean-to. It is L shaped and situated at the back of the site, close to the eastern boundary and orientated towards the west. Floor levels are slightly raised to the east and south due to the terrain and the front pedestrian access, situated in the apex of the L is served by several steps. The

bungalow has a pitched shallow roof with gables and windows serving habitable rooms on all elevations. It is faced in brick with a tiled roof.

A detached, flat roofed single garage has recently been built under Permitted Development, sitting slightly behind the bungalow and abutting the northern boundary. It is served by the vehicular access also running flush with the boundary. There is a large hardstanding here with parking for three or more cars.

The main garden is to the front (west) and south, is laid to lawn and is screened by a substantial hedge, with a timber fence running on the northern boundary and another to the south marking the drive and subdividing the garden.

A mono pitched extension has also been added at the rear, built under Permitted Development.

To the north, on the higher ground, are mainly detached bungalows facing west and on a similar, set back, building line. They are generally characterised by hipped roofs and faced in brick/white render with clay tiles roofs. No 20 immediately to the north unusually features a gabled roof. This property is set back from the common boundary with No 18 by over 2 ms. It has added a single storey solid rear extension and beyond this a conservatory. There are facing flank windows in the original side gable, one of which serves a habitable room and in the conservatory. The common boundary is formed by a 1.8 ms solid timber fence, supplemented by some shrub planting and the application property's existing garage. Another bungalow, No 22, but this time with living accommodation in its converted loft, is to the north of No 20 and includes one window and at least one rooflight in its south facing elevation, serving habitable rooms.

To the east is No 36 Foxley Lane part of a group of larger, houses or chalet bungalows, also on a common, set- back, building line and facing south. No 36 is a full two storey house, with hipped roof and front gable and faced in brick with tiled roof and 6 to 9 metres off the common boundary with No 18. There are windows serving habitable rooms in its facing elevation but these are secondary. The common boundary is a substantial hedge, supplemented by some medium sized trees.

Directly opposite the site in Hayling Rise are a couple of hipped roof houses but elsewhere and along Foxley Lane, hipped and gabled roof bungalows (many with converted lofts) predominate, excepting the new housing development on the corner of Hayling Rise and Woodland Ave, over 100 ms to the north.

There is no other relevant planning history, apart from the recently withdrawn schemes described below.

Proposal

The proposal is to enlarge and upgrade the existing bungalow by infilling the gap in the L shaped footprint and building an additional storey throughout to form a four bed chalet house, including projecting new gable.

It follows withdrawal of two complementary similar applications last year.

AWDM/0811/15 Ground floor infill extension and complete first floor extension with 2 dormers to south elevation, 2 dormers to west elevation and, 1 dormer to north and east elevation was due to be considered at Planning Committee on 26.8.15 but withdrawn amidst a recommendation for refusal on grounds that the remodelled house would, by reason of its siting, form, height and design, present a poor composition and appear as a prominent, alien and discordant element in the streetscene and would, additionally, result in the loss of outlook to the occupiers of No 20 Hayling Rise and it has not been demonstrated that unacceptable loss of natural light would not also occur to the same occupiers. As such it would result in an unacceptable loss of visual amenity and would be detrimental of these neighbours' living conditions.

AWDM/0938/15 to rebuild an enlarged double garage adjacent to the northern boundary and attached to the remodelled chalet house was withdrawn shortly before AWDM/0811/15, with the applicant electing to use the Permitted Development route to build the single garage now constructed.

The application seeks to address the previously expressed concerns over the withdrawn scheme.

There has been pre-application discussion on the revised scheme.

The application has been called in at the request of a Ward Councillor.

The remodelled house continues to follow an essentially square footprint but is topped with a wholly pitched roof (43 degrees) rather than the flattened pyramidal roof of the previous scheme.

It likewise faces west but has omitted the previous rather substantial four half dormers in favour of a gable projection southwards; a first floor window a piece in each of its main gables facing west and east and rooflights in the south and north elevations.

The east facing gable window and north facing rooflights are obscure glazed.

A pitched roof porch is also added to the west elevation, similar to before.

A raised patio area is added on the southern elevation.

The house is faced in plain hanging tiles at first floor throughout, the existing ground floor brickwork retained, supplemented by render on the infill.

The proposal remains four bedroom with the fourth room at ground level as in the previous scheme.

However, whilst previously the scheme was close to two full storeys with eaves raised to between 4.5 and 5.5 ms, the eaves have been kept as existing at 2.6 to 3 ms (difference due to sloped nature of site). The roof height itself is only marginally reduced from 7.6 ms to 7.2 ms.

Representations

Objections have been received from 16, 20, 24, 24A, 25, 26, 29, 31 and 39 Hayling Rise; 8, 34, 36 and 37 Foxley Lane; 25 Woodland Ave and High Salvington Residents' Association as follows:

- Although any property can be altered or redeveloped, and I am all in favour for altering or extending a property, there has to be potential in the first place to make drastic alterations.
- If considering a loft conversion, there really needs to be sufficient headroom and floor area to warrant such alterations, especially as you normally lose part of or a room downstairs for the staircase.
- If a building isn't big enough in the first place and it sits on a tiny plot, then that limits any potential in that property.
- There have been quite a few major loft conversions in Hayling Rise but as far as I am aware, none have radically altered the pitch of the roof to accomplish this.
- Was the size and pitch of the roof a planning stipulation when originally built so it didn't impact on the neighbouring properties?
- On this side of in Hayling Rise all the properties are bungalows and this proposal would not be aesthetically sympathetic to the overall area/appearance; not to mention the privacy issues concerning the adjacent properties and the loss of valuable light source as well!
- This plot is too small for the scale of development and if permitted will give rise to more activities/noise and parking issues to a normally quiet area. This is a corner plot on a busy junction and any parking on Hayling Rise/Foxley Lane will obviate a danger to any cars exiting/entering those roads. There are a number of elderly residents in this sort after area, therefore, due care must be a priority.
- Whilst accepting the proposed planning application would be on the same footprint as the present building, (apart from the extension to the lounge and porch areas), I feel that the addition of an extra floor would detract from the original aesthetic and architectural designs and layout of the east side of Hayling Rise.
- Concern is expressed regarding the loss of privacy and reduction of light to adjoining properties especially the single storey bungalow of No. 20 Hayling Rise.
- The present property is on a small corner plot and has parking commensurate with a two bedroom bungalow. The plans show an increase from two to four bedrooms and concern is expressed regarding the future provision of on-site parking or will parking for this property spill out onto the road?
- Should this application be accepted then I feel this could be the thin edge of the wedge of future plans wishing to replicate extending from single storey properties to houses. Surely this would diminish the original design concept of properties on Hayling Rise.
- The plans for this application are misleading as they do not show the large extensions and enlarged garage already completed by the applicant under permitted development provisions. The small triangular site is already 'crowded' by the enlarged footprint of the bungalow and the enlarged garage. If the roof is raised it will be out of keeping with the architecture in Hayling

Rise and will have a severely adverse impact on the natural light to windows on the south side of number 20 Hayling Rise.

- The WBC Core Strategy and Saved provisions require the Council to protect the character of individual buildings and of neighbourhoods and this application should be evaluated in the light of these provisions.
- Although it will add to 16 Hayling Rise being overlooked our main objection is overdevelopment and the effect on the immediate neighbours.
- I believe the proposed development of 18 Hayling Rise, which at the moment is a small single storey 2 bedroom bungalow into a 2 storey, 4 bedroom house to be an overdevelopment of the site and totally out of character and appearance to the surrounding area.
- The proposal increases the property height approximately two fold and with dormers and windows in the new roof space on every aspect.
- The proposed house would overlook several neighbouring properties including 31 Hayling Rise. The surrounding properties are private and not overlooked due to the properties being of the same height and any extensions being confined to their existing roof spaces. All the properties in this section of Hayling Rise, in the character and design of the area are such that the properties fall away to the South in line with the hill. The other consequence of the proposed increase in height of this development is of course the loss of light to neighbouring properties.
- The proposed ground floor infill appears to be forward of the existing building line on the East side of Hayling Rise.
- Highway safety is already being compromised with the current owners having several vehicles including vans, which are often parked on Hayling Rise, extremely close to the junction with Foxley Lane. This causes a hazard when turning out of Foxley Lane due to a lack of ability to see oncoming traffic on Hayling Rise. This is a bus route. In addition the vehicles often get parked on the grass verge. Currently in this vicinity people park off the road on their own property again in keeping with the character of the area.
- Building works have already taken place with the construction of an enlarged garage and a side extension on the east side. Whilst I realise this is not in contravention of existing planning laws as I presume it is under permitted development, it does not fill me with any confidence that the developer or owner appear to have any regard for planning or building regulations, let alone the sensitivities of the neighbours. These enlargements are not shown on the existing application plans.
- The corner infill on the eastern elevation appears to be outside the building line, but the foundation works for this have been completed and the concrete slab installed. This property owner is enlarging the footprint by stealth already.
- It is my understanding that the proposal conflicts with Core Strategy Policy 16, policy H16 + H18, the National Planning Policy Framework and allied practice guidance.
- I urge you to reject this planning application and not allow a house to be built, but to keep any development to a "chalet style" dwelling with no increase in height of the roof line or encroachment beyond the existing building line in keeping with all other properties in the immediate area.
- Concerns over safety during the rebuild with vehicles parked outside and obstructing visibility

- It is important to note that the submitted plans do not show the permitted development work already carried out at this property including an additional eastern extension and a double garage to the north of the property. The plans submitted for the eastern elevation showed obscure non-opening glazing to all of the east windows. This does not match the reality of the clear opening glass that has been fitted.
- The plans for the property show four windows on the north elevation which could overlook the rear garden of 36 Foxley Lane and on the east elevation which would overlook the front and rear gardens. These proposed windows on the first floor of both the north and east elevations would reduce the privacy to my property, especially to the back garden.
- The window on the east elevation is an en suite bathroom (noted that the plans provide for an opaque window on the east elevation.)
- One of the windows on the north elevation is for a landing and the other windows on the north elevation are for a bedroom.
- A requirement of using opaque non-opening windows for all new windows on the north and east elevations would address these concerns. Not being overlooked was one of the main reasons for the initial purchase of this property and for my continuing residence here for over 40 years.
- All the properties nearby on Hayling Rise which have had extensions have not had them built above the existing roofline. The plans for the proposed development show that the roof would be substantially higher than the bungalow's existing roofline, this would "appear noticeably and incongruously taller than the bungalow to the north and at variance with the characteristic stepped arrangement of the bungalows as they follow the gradient of the hill downwards" — the same issue which was highlighted in the case officer's report about the previous planning application. The design is not aesthetically pleasing and the prominence of the site on the corner exacerbates this issue and could be considered an overdevelopment of this small plot especially with the recently built eastern extension and enlarged garage which are not shown on these plans.
- Originally the owner assured us that he was not planning to increase the height of the existing roof line, but again the submitted plans show it is intended to more than double the height!
- 18 Hayling Rise is very concerned that the increase to the roof line shown on the plans together with 4 new windows to the North would overlook our property (which is very close) and would result in significant loss of our privacy, outlook and light and also considerably reduce the sunlight into our garden and home! The four windows would overlook our living and dining area, our third bedroom and en-suite.
- On this small triangular plot on which the owner has already more than doubled the size of the original garage and built an extension to the East. Neither the garage nor the extension of the room to the East have been shown on the plans which therefore are not accurate.
- Loss of outlook to No 20 Hayling Rise
- Although any property can be altered or redeveloped, and I am all in favour for altering or extending a property, there has to be potential in the first place to make drastic alterations.
- If considering a loft conversion, there really needs to be sufficient headroom and floor area to warrant such alterations, especially as you normally lose part of or a room downstairs for the staircase.

- If a building isn't big enough in the first place and it sits on a tiny plot, then that limits any potential in that property.
- There have been quite a few major loft conversions in Hayling Rise but as far as I am aware, none have radically altered the pitch of the roof to accomplish this.
- Was the size and pitch of the roof a planning stipulation when originally built so it didn't impact on the neighbouring properties?

High Salvington Residents Association

This design would be overbearing to the adjacent property at 20 Hayling Rise and would change their outlook, remove privacy and block light in a very adverse manner.

It will dominate the corner of Hayling Rise and Foxley Lane and will impact adversely on the street scene in the area. Bungalows built southwards from the junction with Newling Way are deliberately planned architecturally to enhance the hill as it slopes towards the sea.

The WBC Core strategy and saved provisions require the council to protect the character of individual buildings and neighbourhoods. The application and related application are both out of keeping with the character of this road and neighbourhood. If approved a precedent could be set encouraging further inappropriate conversions in this stretch of Hayling Rise.

Number 18 is built on a small triangular plot wedged into the corner of Hayling Rise and Foxley Lane. The enlargement of the present footprint, the addition of an attached enlarged garage (already constructed) the considerably heightened roof accommodating the first floor addition will together constitute significant overdevelopment of the site itself. In the wider context of the corner area Number 20 Hayling Rise will be especially adversely impacted by the proposed development.

The new roof height will virtually block all natural light out to their study and en-suite and it will cause loss of privacy. The outlook from number 20 Hayling Rise will be adversely compromised and the property will be overlooked by the first floor roof lights. Should the building work go ahead it will raise the level of noise to an unacceptable degree for this normally quiet residential neighbourhood.

One representation of support has been received from 3 Elizabeth Mews, Woodland Avenue as follows:

I see no apparent reason for refusal, as all neighbouring properties are extended and developed already in similar ways. I believe the proposed extension will be in keeping with the area and I am in full support as there are many properties along Hayling Rise that have already raised their roof lines and subsequently improved the character of the street.

Planning Appraisal

Section 70 of the Town and Country Planning Act 1990 (as amended) 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; and

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

The Core Strategy, including Worthing Saved Local Plan policies, comprises the Development Plan here but the Government has accorded the National Planning Policy Framework considerable status as a material consideration which can outweigh the Development Plan's provisions where such plan policies are out of date; or silent on the relevant matter or at variance with the National Planning Policy Framework.

The Council's self-assessment of the Core Strategy's Conformity with the National Planning Policy Framework demonstrated that, in many respects, the Council's key Development Plan conforms closely to the key aims and objectives of the Framework.

The main issues raised by the application are;

- The principle of upgrading the housing stock and its facilities by means of remodeling the bungalow.
- The quality of the design and impact on the character and appearance of the area.
- The impact on the amenity of neighbouring occupiers.
- Access and parking
- Other environmental impacts

As such the proposal should be assessed principally against Core Strategy Policy 16. Saved Worthing Local Plan Policies H16, H18 and TR9 and National Planning Policy Framework and allied Practice Guidance and Supplementary Planning Guidance Extending or altering your Home

The principle of upgrading the housing stock and facilities by means of remodelling the house

The proposals enlarge and modernise this untypically small bungalow and enhance the town's stock of good sized family houses with gardens.

Whilst the alterations and extensions are extensive and the appearance of the bungalow transformed, much of the structural original building fabric remains and this is strictly speaking a householder application.

To this extent, the proposal makes effective and efficient use of the existing stock within the urban boundary and in a sustainable manner. The principle is accordingly welcomed.

However, the acceptability of the actuality is dependent upon its wider environmental impacts as assessed below.

The quality of the design and impact on the character and appearance of the existing property and area

The remodelling of the bungalow respects the building line and the footprint remains much as is as now, except the infill at the front, new projecting south facing gable and the addition of the porch. These are appropriate for such an exposed corner.

The principal issues with such a bungalow remodelling remain its form, height and design and balancing the understandable wish to create family sized accommodation on this otherwise reasonably sized plot, against the impact on character.

It is considered that the applicant has, with this revised design, achieved an acceptable balance.

Whilst the roof ridge is only slightly below that of the previous scheme, the eaves are set substantially lower below (i.e. as at present) and the anomalous and assertively large dormers omitted. Equally, the roof is set on a relatively shallow pitch and is of a design not untypical for the area.

The gable windows help break up otherwise unarticulated elevations and whilst the array of rooflights is not ideal, the northern elevation is not readily visible from the street.

The mix of render and brick lacks any aesthetic rationale and the render would be better replaced with brick to match existing. This may be secured by condition.

As a composition, the chalet design is much improved and would sit comfortably in the plot and the locality, bearing in mind its corner location.

The impact on the amenity of neighbouring occupiers

The closest neighbours are at No 20 immediately to the north and 36 Foxley Lane immediately to the east.

No overlooking would occur due to the obscure glazing of the relevant upper floor windows if the opening parts were no lower than 1.7 metres above finished floor levels and given the boundary treatment and separation distances at ground floor level. This may be secured by condition.

The concerns raised by the neighbours are noted and some loss of outlook would certainly occur for No 20 from the remodelled house in terms of views of the sky (rather than horizon), especially from the rear garden and conservatory.

Additionally, there is the concern that, given the proximity of the north corner of the remodelled house; its position to the south of the neighbouring bungalow and its size, some loss of natural light could also occur to the south facing study of No 20. (though no technical assessment has been submitted to definitively assess the natural light impact on this room).

That said, the remodelled bungalow does edge away from this neighbour; the study is not a main living room and the remodelled bungalow is on slightly lower ground.

Whilst the above concerns continue to be underlined by the objections received from neighbours, on balance, given the lower eaves and pitched roof and the otherwise acceptability of the proposal in design terms, and applying the 25 degree rule of thumb from the centre of the affected window, these would not justify refusal on neighbour amenity grounds.

The effect on No 22 is still less at the separation distance involved.

Because of the separation distances, boundary treatments, topography and form of the proposed new works, no unacceptable harm to No 36 or any other property would occur in terms of natural light and outlook.

The reconstructed garage, compliant with Permitted Development restrictions of no taller than 2.5 ms, does not aggravate matters. The new conservatory built under Permitted Development does not impact critically either.

Activity from the enlarged house and/or garage (including parking and traffic) would not be so increased as to unacceptably affect the amenity of No 20.

Third party wall impacts are dealt with under the relevant legislation.

Access and parking

Vehicular access is unchanged in the remodelled bungalow application and the property continues to include a substantial hardstanding for parking and garage.

Other environmental impacts

There are no protected trees on the site and the substantial hedge would remain.

Surface water drainage may be addressed by condition.

Recommendation

Grant permission subject to the following conditions (summary)

1. Implement within 3 years.
2. Build in accordance with approved plans
3. Obscure glaze windows in north and east upper floor elevations
4. No new windows on upper floor north and east upper floor elevations
5. No works outside 8am to 6pm Monday to Friday.
6. Agree dust suppression measures

Background Papers

Observations of Members of the public.

Application Number: AWDM/1828/15

Recommendation –APPROVE

Site: Elton Lodge 22 - 24 Selden Road Worthing

Proposal: Change of use from residential care home (Use Class C2) to house in multiple occupation with 22 separate units and communal kitchen area on ground and first floors and external alterations.

Applicant: Mr J Hannah
Case Officer: Peter Devonport

Ward: Selden



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

Site and Surroundings

This a former care and nursing home for the elderly (21 bedrooms) sits midway down Selden Road in a mixed inner residential suburb, to the east of the town centre and hospital, containing mainly flats, HMOs and bedsits and residential institutions (a residential rehabilitation project for people who are experiencing homelessness and substance misuse is sited close by) as well as family housing. The care /nursing home closed in August 2014 and has remained vacant since.

It comprises two conjoined two storey properties originally built as Victorian houses and linked by a central two storey extension. The care/nursing home appears to have been operating from the former No 24 for many years but from No 22 only since 1987, before which it was arranged as bedsits.

The building has added a single storey rear extension across much of the width of the properties and also a part two and part one storey extension on its northern

flank, as well as a single storey detached garage on its southern flank just to the rear of the property.

The building is set back on a common building line with a modest front garden and is separated by its neighbours to the north and south by reasonably broad gaps. The main pedestrian access is centrally sited by a crossover but the main vehicular access is on the southern boundary with long drive down the side capable of taking at least three vehicles.

To the north is a group of attractive Victorian houses. No 26 adjoining the site is converted to bedsits as is No 28 to the north of this. Both have limited on-site parking. The boundary with No 26 is formed by a wall.

To the south of the site is No 20, also a detached large Victorian house. It is set back from the medium sized common boundary wall by the width of its own drive.

To the rear is the deep rear garden of 43 St Georges Road; a small part of the garden of a back land at No 33A and part of a large parking court, the boundary for which is made up of a wall and some planting.

Opposite are two storey flats and just to the north a property 39 Selden Road the subject of an application (AWDM/1609/15) *for Addition of third storey and three-storey rear extension to west elevation of existing building to provide a total of 7no. one-bedroom flats and 2no. two-bedroom flats with alterations to external materials and additional car parking.*

The area forms part of a Controlled Parking Zone with bays outside the site.

Planning History

There is no planning history at the site of direct relevance to the application.

Proposal

The proposal is to convert the building to a 22 unit HMO. All will have en-suite rooms but share two kitchens, one on the ground floor and the other on the first floor.

No external changes are shown, save replacements of sliding doors on the rear patio with French doors and provision of a waste bin and cycle store by the north boundary just in the rear garden.

In addition, the existing detached garage by the southern boundary is demolished and a parking bay designated in the drive. The existing vehicular access is retained.

The rear garden is communal but landscaping is unspecified.

Access to the building remains as at present with rear access to the garden also kept.

Internal changes are largely restricted to rationalising existing space.

Supporting Statement

The application is supported by a planning, including marketing statement and on street parking capacity survey.

Marketing of the Site

We can confirm that the property has been marketed since August 2014. The site has been marketed by Christies and Co and subsequently by both Jacobs Steel residential and commercial teams. The property was then placed for sale at Jacob Steel Auction in July 2015 and again there were no offers albeit the auctioneer reduced the opening bid £100K from the guide price. The property has been marketed on numerous marketing portals including Rightmove and Zoopla.

The property has been viewed by in excess of 10 applicants. The feedback is that the property is not commercially viable as a going concern and costs and work to be undertaken to convert the property too excessive.

Alternative Uses of the Building

As outlined below there are major issues associated with alternative uses and the change of use to a licensed & regulated HMO is the best use for this property.

EXISTING USE/NURSING HOME—The property would need a very extensive renovation to bring it to a standard that could comply with the necessary regulations. For the property to continue as a Nursing home it would have needed to meet new room size & wet room standards. Thus, it was no longer suitable/desirable use due the age and state of accommodation for this property. Finally, access to rooms 10 & 11 were becoming an issue with the Fire Inspector due to the proximity of the stair lift.

FAMILY HOME(S) – To convert this building into two family dwellings would require extensive refurbishment works. This is a very large commercial building and does not lend itself to being a single family home. There are a number of large family homes available on the market in very good condition in the area.

CONVERSION TO FLATS –It is not financially viable to convert the building into flats. Taking into account, the cost of purchase, cost of con-version (including 20% VAT for refurbishment works) and the end value of the development, makes any conversion unviable. This is further evidenced by the fact that the property remained on the market for a considerable period of time with no offers made.

HOUSE OF MULTIPLE OCCUPANCY ACCOMMODATION - The above demonstrates that the best use of this building is for a high end HMO that caters for working professionals in the area. The existing rooms could be easily converted within minimal alterations to the structure or internal layout of the building.

Proposals

The project is to convert Elton Lodge which is a redundant nursing home into a HMO of self-contained rooms with en-suite toilet and washing facilities; with communal cooking facilities and private communal garden. The external fabric of the building will not be altered in any way.

In order to attract working professionals and high end tenants the accommodation offered has to match or ideally be of a higher standard than current comparable accommodation in the area.

The layout of each tenant's room has been carefully considered and incorporates en-suite washing facilities and food storage areas. This avoids occupancy issues, as tenants are not sharing washing & toilet facilities. This also encourages tenants to settle longer.

In addition the tenants will have full use of a private landscaped rear garden area via a communal access door at ground floor. This area will be secure and provide quality amenity space for the tenants.

The purpose is to provide good quality, well managed accommodation to people who simply can't afford to live in a flat on their own along with all the associated costs that come with it.

Internal Features

To attract professional workers the property will include the following:

- *Coded Entry Systems for each room*
- *Refurbished rooms with new decorating and flooring*
- *Communal Wi-Fi*
- *Electricity*
- *Gas*
- *Fully wired with an up-to-date fire alarm system, including sensors and alarms throughout*
- *High end communal kitchen at ground and first floor*
- *Self closing magnetic fire doors*
- *FD30s Fire Doors*

Additional Features

- *Secure walled landscaped Communal Garden Area*
- *Commercial Waste Contract*
- *Bin Storage*
- *Bike Storage Facilities*

Tenant Profile

Elton Lodge will be transformed into a High End HMO providing affordable, safe and well managed rental accommodation for professional workers within the town. Worthing boasts the headquarters of The Environment Agency, Glaxo Smithkline,

Southern Water whilst the town centre occupies many banks, building, societies and major retailers.

It is these professionals along with keyworkers such as nurses and doctors that the property will be looking to cater for. It is important to stress that there is a shortfall of affordable rental accommodation in Worthing with NHS Staff Accommodation within Worthing has been reduced significantly, with a number of the sites sold; and due to the close proximity of the site to Worthing Hospital we would anticipate a number of the rooms being occupied by hospital workers.

To conclude we are specifically looking to attract:

- *Junior/Student Doctors*
- *Nurses*
- *Health Care Assistants*
- *Hospital Catering Staff*
- *Hospital Porters*
- *Hospital Cleaners*
- *Hospital Administration Staff*
- *Town centre retail employees*
- *Town Centre Office workers*
- *Civil Servants*

Conclusion

The proposed change of use from a Nursing Home has been carefully assessed from a planning, social and economic basis to provide what we perceive to be the best use for the property.

The proposal utilises the existing fabric of the property with minimal changes both externally to the property and internally. Furthermore, the scheme has large private landscaped garden area for all the tenants use.

This statement provides the rationale behind a highly considered, high quality sustainable proposal that befits the site. Under the circumstances we trust that Worthing Borough Council will be minded to support the application.

On street capacity surveys

Parking surveys were undertaken in the early hours of Tuesday and Wednesday 23rd and 24th February.

The surveys generally followed the "Lambeth Methodology" in that the surveys were carried out between 12.30am and 05.30am on 2 consecutive weekdays. The scope of the surveys covered all roads within a 200m walk distance of the application site. The surveys recorded the number of vehicles parked at the time of the survey.

As you know, the roads surrounding the site are within Controlled Parking Zones (CPZ). I have attached a copy of the Council's CPZ mapping that shows that the site is within zone D and roads to the north of Lyndhurst Road are within zone H. Both of these zones have the same parking restrictions which are Permit holders

only between 10.00 and 11.00hrs and between 14.00 and 15.00hrs Monday to Saturday.

Outside of these times on-street parking is not restricted. I have attached 3 further plans. Plan SR1 shows the existing parking restrictions (other than the CPZ restrictions). Plan SR2 shows the number and location of vehicles parked on Tuesday 23rd February at approximately 12.30am. Plan SR3 shows the number and location of vehicles parked on Wednesday 24th February at approximately 01.00am.

It is clear from the results of the surveys that there is extensive on-street parking available within a 200m walk distance of the site. This reflects the results of previous parking surveys undertaken by the developer of 7 Madeira Avenue on 22nd May 2015 (although those surveys were carried out during the mid-morning on a single day).

In my opinion, the results of our surveys prove that there is ample spare on-street parking capacity to accommodate any limited increase in parking demand that your proposals will generate.

Consultations

Environmental Health Officer

The applicant has already engaged with this Department for advice with respect to using this property as an HMO, and I met with the architect and owner on site on 18th November 2015.

I note that the applicant has taken on board many of the suggestions that I made during my site visit, and I can therefore have a high level of confidence that the property will be free from serious hazards and comply with the Management of Houses in Multiple Occupation (England) Regulations 2006. These requirements would continue to remain in force for the entire time that the property is in multiple occupation.

Please note that as the property is two storey it will not be subject to Mandatory Licensing as set out in the Housing Act 2004. However, Central Government have recently sent out a consultation on expanding the criteria for mandatory licensing. Based on the questions asked it seems possible that this is the type of property that will be included in such a reform.

I would add that this Authority continues to review the merit of introducing a Selective or Additional Licensing scheme within the Borough, which would enable us to require properties such as this to hold a licence, providing greater control.

It is my experience that a well maintained and managed property is less likely to experience issues of antisocial behaviour, particularly in the long term. To date, the applicant has engaged with the Private Sector Housing team to ensure that they will meet their legal requirements should they proceed with the conversion of the property to an HMO.

You may be aware that the property 26 Selden Road is currently licensed for use as an HMO. 28 Selden Road has historically been used as an HMO (licensed) but is currently undergoing extensive refurbishment to a high spec. and may return to use as an HMO in the near future.

Highway Authority

Background and Summary

The proposal is to convert Elton Lodge which is a redundant nursing home into a HMO. Elton Lodge is located in a residential area approximately a quarter of a mile east of Worthing town centre on Selden Road. Selden Road is a 'D' Class Road subject to a 30 mph speed limit. In summary the LHA (Local Highways Authority) consider that the proposal would be acceptable from the highway point of view. Details comments are provided below.

Content

The proposal does not have a direct access onto Selden Road. In line with the previous use no parking is available for the proposed apartments. Selden Road operates a Controlled Parking Zone (CPZ) permits can be applied for. The Local Planning Authority (LPA) should consider this against their respective parking standards. The property is well located with sustainable travel links being close to the A259, A24 and A27. There are frequent rail services along the coast to Brighton, Chichester, Portsmouth and up to London. Worthing Station is situated approximately 1 mile from the property. There are frequent bus services that are a 2 minute walk from the property to the north, this links into Worthing town centre and other local facilities. It is therefore considered that the proposal does offer residents a viable alternative to travel over the private car.

In considering parking associated with this proposal, the LHA are aware of the existing comprehensive enforceable waiting restrictions that prevent parking from occurring in locations that are detrimental to highway safety.

The site is recognised as having a permitted C2 use which has operated for some years. In considering the change of use the potential vehicle movements from the permitted use is a material consideration. Given the scale of the proposal and the existing permitted use a TRICS assessment and Travel Plan are not required. It is not considered that there will be a material increase in traffic movements over the existing use. In addition there are no known capacity and congestion issues within the immediate vicinity of the site. From a capacity perspective we are satisfied the proposal will not have a severe residual impact.

Conclusion

The proposed development is forecasted to generate a comparable number vehicular movement over what has been generated historically by the site. These movements will be spread across the day.

The NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are

severe. It is not considered that the proposed change of use application would give rise to an impact that could be considered 'severe'.

Drainage Engineer

The proposed site lies within flood zone 1 and appears to be unaffected by surface water flooding.

The applicant has indicated that there will be no external alterations therefore there will be no change to surface water discharges and hence we have no further comments on this application.

Police: Crime Prevention Design Adviser

I have had the opportunity to examine the detail within the application and in an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments from a Secured by Design (SBD) perspective.

The level of reported crime for Worthing is just peaking above average when compared to the rest of Sussex whilst crime levels at this location are low when compared to the surrounding areas.

Historically there are cases where HMO's have given rise to instances of Anti-Social Behaviour (ASB). To reduce the risk of this occurring there will need to be stringent management control of tenancies. This could be implemented as a condition of planning. Should you have concerns with ASB and perceived issues of crime and disorder within this area I ask you to liaise with Adur & Worthing District council's ASB Team which for this area is the Adur & Worthing Council's Safer Communities Team.

Whilst I have no concerns regarding the design and layout I recommend the following security measures to be implemented within the development;

- Communal front entry door and rear entry doors to have an access control system incorporated into the inner hall door. The outer door can be open for postal deliveries. The side lights either side of the main entrance door will provide observation into the lobby to prevent any loitering.
- Secure external post boxes that conform to TS009 to be fitted within the main entrance lobby.
- Flat front doors to conform to PAS 024-2012 or have fit for purpose locks fitted that conform to TS 007 security standard if the original doors are to be retained. I do not recommend the fitting of the proposed push button coded entry locks for the individual rooms unless they conform to BS 8607 standard grade 2 or above, this equates to BS 3621 standard.
- Any ground floor windows or doors that are being replaced are to conform to PAS 024-2012. Any windows that are being retained are to have adequate fit for purpose locks or security measures fitted.

Safer Communities Team

This road already contains a number of HMO properties. I have concerns about the impact that an additional 22 dwellings will have on the infrastructure, particularly in terms of parking. I note that there is no space allocated for off road parking as part of the development and I believe this would cause significant issue for current residents and those at the proposed development.

I would also question the demand for this type of accommodation in this area? Is there demand from professionals e.g. hospital staff to live in this style of accommodation? Have the developers conducted this research? It is essential that the standard of housing in this area, would suit working professionals if it is to attract hospital staff.

This area plays host to a number of different types of HMO (some of which is supported housing) and therefore I believe this would cause an over concentration of people/ dwellings in a small space and would be detrimental to the demographic of the current area.

The Communities Team

The site falls within a Local Neighbourhood Improvement Area - groups of electoral wards within West Sussex, which have been locally identified as the most deprived areas in the county. Whilst, this is not amongst the most deprived in the borough, nor is it a priority for action, the provision of low cost housing as proposed would help meet a recognized local housing need.

Representations

Objections have been received from 20, 30 and ground floor flat 32 Selden Rd; 4 and 6 Church Walk and 47 St Georges Rd and two from London, as follows;

- Elton Lodge was a dual registered care and nursing home managed by a single entity; the proposal for a 22 bedroom HMO significantly changes the use of the property. It reduces local employment in the area and also reduces the number of care/nursing home places available.
- The West Sussex County Council in its Healthy & Well in West Sussex, West Sussex Public Health Plan 2012-2017 specifically aims to improve the quality of care home provision. Allowing care homes to close is contrary to one of its strategic aims. Further, a document entitled Better Care Fund, April 2014 sets out what needs to be done to meet the rising demand for health and social care and says all local health and social care organisations are committed to Improving the quality of care in care homes working with local nursing and care homes to build on the strengths of what is available locally. It comments that a further purpose of these aims is to support delayed transfers of care. Allowing the closure of a care and nursing home does not seem to be building on the strengths of what is available locally.
- We understand that prior to the current offer for Elton Lodge being accepted a substantive offer was submitted by a proprietor of other local care homes. This was turned down as a higher financial sum was required. I fully appreciate and understand anyone wishing to maximise their own financial

return. However, when local employment and support services for vulnerable and elderly people are central to the issue, I believe these matters are of equal concern. This same document predicts that the trend of the local population is an aging one and service demand is likely to increase, particularly along the coastal towns. All this in a town that already has one of the highest percentages of elderly residents over 85 in Europe.

- Additionally, even without the concerns of care services and employment, the nature of enjoyment of the existing character of the neighbourhood has to be taken into consideration. Indeed, when we purchased our own home in Selden Road in 2009 the site had previously been sold for a significantly higher sum to developers who wished to turn the property into a number of flats. At that time the council, in listening to others who lived in the area, agreed that the character of Selden Road was important and needed more family homes to remain. Planning permission was refused and the developer pulled out and we purchased it as our home at a lower price than the vendor had previously been offered by the developer.
- The proposal to squeeze as many single room units into the space as possible does not provide quality sustainable housing for anyone. These kind of units do not encourage longevity in a neighbourhood and will become nothing but transitory stops for people who will no doubt move to something more pleasant as soon as they are able to do so. There are many support lodging arrangements in our immediate vicinity, Delaney House being one. All of us who moved here knew of these supported housing arrangements for people with a variety of needs, we are not people who do not recognize that communities need space for everyone. However, these are managed and supported arrangements and we believe the balance is reached. We already have another new development for small dwelling units (39 Selden Road), that having received initial planning consent, is now applying to add another floor and build even more units, this is just a few metres from us. We do not believe that a further 22 units in Elton lodge can be integrated without having a detrimental affect on our community.
- Potentially 44 adults using the same building (each room could easily have two adults). We have particular concerns over the amount of noise that would be generated in the evening and overnight by such a large numbers of adults.
- Refuse; the care home sited their bins against the wall that divides our properties something that the development proposes to continue. Occasionally we had issues with refuse being pushed over the wall by the weather, easy to resolve as there were always staff within the nursing home to liaise with. With potentially 44 adults using the same structure this will be difficult or impossible to manage and have a direct unpleasant impact on our property.
- Refuse (2) the Worthing Space Planning SPD (Feb 2012) indicates that 140 litres of refuse per unit and 140 litres of recycling waste per unit should be provided. The proposal indicates that two 1100 litre bins will be provided, presumably split between refuse and recycling, just over a third of the recommended amount which is likely to lead to refuse being dumped in plastic bags and then scattered by the wildlife which lives in the area.
- Parking; there are no plans for parking associated with the development. According to the WSCC parking standards advice; 0.5 parking spaces per room or unit should be allocated. Thus the development should be providing

a minimum of 11 parking spaces. Selden Road is already crowded in an evening. With potentially another 44 permits being allocated for the street on top of other HMOs / developments already agreed, parking will become impossible. As mentioned previously there is already an existing planning development in place (No. 39) which will increase parking and additionally at number 28, a property that has been developed into an HMO but is currently completely empty.

- Cooking / Eating areas in the Worthing Space Standards SPD (Feb 2012) it describes a four bedroom property as requiring a space of 33m² for cooking and eating. While the planning documents (exceptionally) do not show the space assigned to the communal cooking and eating areas it would be reasonable to estimate that (at most) they are a total of 40 m² over the whole building this would seem to be grossly inadequate for a building with 22 bedrooms.
- Infrastructure issues in addition to the parking issue the sheer number of extra adults (potentially 44) generated in Selden Road would put a strain on the general infrastructure; phone services, cable services (both vital for people working from home), water, and drainage.
- The applicant indicates that their preferred tenants would be professionals, including medical staff due to the proximity of Worthing Hospital. There is no guarantee that professionals would occupy the property immediately or over the longer term financial considerations have been placed as the highest priority in the development itself and if converted the focus would remain on filling the property to generate the highest return. Indeed professionals will have the required income to be able to rent more amenable living space and would be most unlikely to rent there. The experience of those who rent in the HMO immediately next door to Elton Lodge (No 26) is not that they are professional people.
- Given the lack of community space in the property (two small kitchen / diners are provided smaller than most rooms) it is highly likely that there will be a significant turnover of tenants or long-term tenants with no other options. In both cases there is unlikely to be a level of care afforded the building and surrounding environment.
- Previous planning decisions; A similar, albeit smaller, development proposed to change a care home to a 10 bed HMO on Madeira Avenue (ref AWDM/0467/15) was rejected in early 2015 with the following reason; “The proposal by virtue of the number, size and type of bedrooms proposed and the lack of adequate kitchen, washing and bathroom facilities fails to provide a wide choice and mix of high quality residential accommodation to address the needs of the community. The proposal therefore fails to comply with Policy 8 of the Worthing Core Strategy and the National Planning Policy Framework, which seek to provide a wide choice and mix of high quality new homes.”
- We feel that identical issues exist with this application, and in fact are of a significantly larger scale due to the HMO being over twice the size of the proposal on Madeira Avenue and that it should be rejected for the same reasons.
- Equally, we feel the desire to maximise the most profit should not be considered relevant in determining a planning application. As outlined previously, there was interest to retain the care home by an existing WSCC registered proprietor.

- We feel that the property should remain as a care home, or, converted back into individual family homes (as it was previously), similar to the homes built opposite the Splashpoint swimming pool which, as a development of family homes, all sold and are lived in and demonstrates the demand locally for family accommodation. While we understand that there may be financial issues associated with both of these approaches we do not feel that those issues should drive the approval of a scheme that will be massively detrimental to the community environment in and around Selden Road.
- In conclusion we would note that the application was made just before the Christmas/New Year period. No doubt hoping to benefit from a pressurised and busy time of year to reduce responses. Like many others, affected by the demands of this time of year, we have had to leave our response until now. In the past couple of days we have attempted to visit a couple of neighbours to hear their views on the proposal. Neither had received any notification of the proposals, something that was surprising to both them and us. They both thanked us for informing them of the development and they have submitted their own responses. Our greater concern here is that we have only been able to speak to two neighbours in this regard and our concern is that others living in the immediate vicinity of this development have not been consulted. The neighbours we were able to catch at home informed us that they have responded to other recent proposals (No 39) and this demonstrates that it is highly likely that they have responded if they had received the information.
- Quality of life for neighbours and residents would be greatly reduced squeezing so many people into such a small area, perhaps the application could be amended to support 2-3 bedroomed flats for a reduced amount of families?
- The application for a 22 room HMO will have a huge and negative impact on the look and feel of this part of Selden Road. There will be an increase in noise, traffic and waste pollution that will result from the unsustainable increase in population density with possibly up to 44 adults potentially living at this address. The nature of the proposed development into 22 bedsits with only 2 shared kitchens will necessarily only appeal to single adult tenants on low incomes who are unlikely to have a long term interest in or commitment to the local community. There are already 2 planning applications (one pending at 39 Selden Road and one approved at 28 Selden Road) which will substantially increase the population density. This application comes when there is a need for balanced development in our road to include family housing and long term residents with a positive commitment to the local community. A previous application for a 10 HMO dwelling in Madeira Avenue was rejected last year and I urge you to reject this much larger development in light of the need for a more balanced approach to the development of housing in this small part of Selden Road.
- I request that it is considered in the overall context of other permissions and applications in this road. Despite being only a few doors away from the property, like other residents at the top end of the street we were not notified of this application and only discovered in when talking to neighbours. We then discovered that they had also not been notified of the recent application concerning no 39 Selden Road. I am concerned that two applications have been made that would substantially alter the nature of the road, in both cases without some of the relevant neighbours being properly consulted. This

probably gives a lower number of objections to each, compared to the number if the whole road had been properly consulted.

- We fully understand and agree with provision of mixed housing within the Worthing area. In context, I point to the fact that we bought our house last year knowing already that Delaney House is located in Selden Road (a hostel for people recovering from alcohol and addiction problems). I mention this to illustrate that our concerns are not of a NIMBY nature and that we fully agree with providing varied kinds of accommodation. However, I think that mixed high-density accommodation should be spread fairly across the whole of the Worthing area, not squashed into one road.
- There are already other high-density permissions and applications in Selden Road. No 28 is currently being converted to 8 units. No 39 was given permission for conversion to 12 units, with a more recent application for a further 7 units. If no 22-24 is given permission for a further 22, the combined effect is that there could suddenly be an extra 49 residential units on this end of the road alone. I consider this unacceptable for the following reasons.
- Parking. Like many neighbours, we do not have off-street parking. There is additional pressure on parking in the street due to the Alexandra Pub in the road, nearby hospital visiting, and shops and businesses round the corner in Lyndhurst Road.
- 2) Change of the character of the road, making it an area of temporary transitory residents rather than a settled community.
- 3) Noise and nuisance. Unlike Delaney House which is a managed residential unit, the proposal for Eldon Lodge is for an unsupervised HMO. I think it is naïve to believe that the HMO would be lived in by doctors, nurses etc. An unsupervised HMO of 22 small units seems very unsuitable in a quiet residential area.
- This is very unwelcome as Selden has in recent months showed signs of improving towards a pleasant mixed family area.
- There are too many HMOs in the vicinity and any increase in the concentration in our area seems to be contrary to both Council Planning Strategy and local amenity.
- Whereas before, it was a nursing home for the elderly, 22 HMO bedsits would bring a significant increase in cars to the area.
- The Police comment that HMOs are associated with anti-social behaviour and so this would seem to be bringing known problems in to our area.
- Over-development in a road with several HMOs either existing or in development compromising the safety and amenity of existing residents as up to 44 additional residents move into the area. This low quality development will only attract tenants with no alternative but to share one of the two kitchens and will presumably move on as soon as possible resulting in a high turnover of tenants with no commitment to the wider community.
- The proposed development will change the character of the area. Rather than being an area predominantly of families and retired people, there will be a very large number of people only living in the area for brief periods of time, which will harm the settled community.
- It is currently very difficult to park on Selden Road / Church walk. With an additional 22 residences, leading to the potential of an extra 44 parking permits, will mean parking will become practically impossible.
- Another recent local development of a conversion of a large house into 3 flats, required 3 parking spaces to be provided. The planning officers were

very particular about this point. This proposal offers no additional parking spaces and as mentioned above, will add a huge amount of pressure to an already busy area, with residents and staff from both the hospital and HSBC using it every.

- There are a great deal of multiple occupancy houses in this area, and an additional 22 units in a single building will make matters considerably worse, with the known risks of increased anti-social behaviour (as per the Police's statement). I do not believe that the landlord will be able to attract the kind of tenants that they are hoping for.
- This low quality proposal only offers a single parking space. Selden Road and the surrounding area has no capacity to provide parking for any future developments, let alone the potential for an additional 22 permits.
- My home is next door to Elton Lodge and I am sorry to have seen this community resource, which provided significant employment, close. There had been interest from other local care home owners to buy it but as sometimes happens, a higher premium is often available from developers who see opportunities to squeeze a cash premium from every square inch (and 22 dwellings is certainly squeezing!). This led to the offers made by owners of existing care homes to be rejected by the vendors (despite the offers matching and exceed the original asking price).
- This kind of development is not supported by strategic decisions taken by Cllrs previously. In Worthing's Core Strategy 2011, which sets out the vision for Worthing to 2026, there is discussion on the need to protect employment opportunities in the town. Strategic Aim 6 (p74) focuses on Enabling Regeneration, through development opportunities and says there will be a presumption against the loss of land/buildings currently in employment use or last in use for employment purposes. I believe this is of particular significance for Selden Road as our area is already identified as an area called a Local Neighbourhood Improvement Area (LNIA). This simply means that we are an area that the council acknowledges needs to be managed and supported to improve the lives of a high number of vulnerable people and people on low incomes/unemployed. Removing local employment opportunities does not do this.
- Selden Road already has a high number of Houses of Multiple Occupancy and as has been stated if other peoples objections, there are already plans in place for further developments of this kind in the road.
- Those who live here know our community and we have people of all ages, skills, education, income and needs. The community already supports a high number of people with particular needs and has a high density of single occupancy accommodation arrangements already. We have in recent years seen a rapid expansion in the number of homes turned into flats. These have been done well but there is a balance and a tipping point that can affect and change the positive sustainability of a community. The two properties to the north of Elton Lodge are Houses of Multiple Occupancy (HMOs).
- Of course it may be claimed that the cost of refurbishment or development of Elton Lodge as a nursing home again is uneconomic although, as previously stated, interest was shown to retain it as such which would appear to contradict such a claim. However, if it is to be accepted that we lose the local employment the nursing home provided, then we propose that alternative family housing developments should be supported.

- The area needs families in family homes that are here longer term to keep the community well balanced. This is my personal view but it is also well supported by Councillors as represented in the Core Strategy.
- At 3.44 we are told that there is an imbalance in terms of the housing within the town. There is a low stock of larger properties and that a significant number of family homes have been lost through redevelopment and conversion in recent years. If the nursing home is to remain closed, we propose that the site should be developed to provide 2 / 3 bedroom family homes. The strategy emphasizes the need to have the right mix of housing and we propose that a 22 bedroom block sited immediately next to other large HMOs is not respecting the need to find the right mix.
- Developments present a unique opportunity to bring forward a balance of new housing, including more family housing than has been achieved over recent years. (at 3,47)
- We have excellent local schools, both primary and secondary, and exemplary health care services. Children would be able to access both without need of transport and have the incredible seaside as playground. Objective 4 of the strategy says family homes [must] be retained in appropriate locations. I believe Selden Road to be a very appropriate location for some family homes that will also help demonstrate improvements in the LNIA. Indeed the strategy says (at 7.9) it is imperative that family homes are brought forward to provide diverse housing that contributes to sustainability of communities. Further emphasized at 7.10 and 7.11 it says the main objective is stop the domination of small flat developments and ensure they are not the principal type of development in the town. I would strongly urge our councillors to consider these already agreed assessed priorities when considering this application.
- The introduction to the Strategy states decisions are not made in isolation, but are properly co-ordinated with a focus on promoting the principles of sustainable communities which meet the diverse needs of existing and future residents and are sensitive to their environment, and contribute to a high quality of life.
- I hope the above introductory statement in the Core Strategy holds true today. Councillors have the very important role of making decisions that can determine whether a community flourishes and thrives or slides into HMO wilderness and as this application is to be discussed by the planning committee, I hope they will consider my comments and observations.
- The proposed development would mean a serious level of over-development alongside the other HMOs already in existence or in development on Selden Road. In addition, the planning department refused permission for a much smaller HMO (10 rooms) on Madeira Road - this development with potentially 22 rooms and 44 occupants represents over-development with the prospect of loss of general amenity and peace and quiet in Selden Road.

24 signed copies of statement below received from near neighbours;

Just before Christmas we received a notification from Worthing Borough Council of a planning application to convert Elton Lodge, the large care/nursing home in our road, into a housing development that will consist of 22 individual 'dwellings'.

The 'closing date' for any objections to the planning application was in January but this has been extended. From conversations we had with some neighbours it was clear that many had not received notification of the planning application.

This was of particular concern as the few neighbours we were spoke with all subsequently registered objections. We spoke with local Councillor, Mr Keith Bickers and he raised the issues with the planning department for us. We are thankful for his intervention in two regards.

Firstly, due to the number of concerns already raised, it was decided that this application will be decided by Planning Committee and not council employees.

Secondly, our CM. Mr Bickers was concerned that local residents had not received notification letters. The Council agreed to re-send these and you should have (hopefully) received it. The closing date for submitting comments is now this Friday, 12th February.

We are directly next door to Elton Lodge and are sorry to have seen this community resource, which provided significant employment, close. There had been interest from other local care home owners to buy it but as is so often the case, a higher premium is often available from developers who see opportunities to squeeze a cash premium from every square inch (and 22 'dwellings' is certainly squeezing!).

This kind of development is not supported by strategic decisions taken by our Cllrs previously. In Worthing's Core Strategy 2011 document, which sets out the vision for Worthing to 2026, there is discussion on the need to protect employment opportunities in the town. Strategic Aim 6 (p74) focuses on 'Enabling Regeneration' through development opportunities and says "there will be a presumption against the loss of land/buildings currently in employment use or last in use for employment purposes". I believe this is of particular significance for us in Selden Road as our area is already identified as an area called a Local Neighbourhood Improvement Area (LNIA). This simply means that we are an area that the council acknowledges needs to be managed and supported to improve the lives of a high number of vulnerable people and people on low incomes/unemployed. Removing local employment opportunities does not do this.

We know our community and we have people of all ages, skills, education, income and needs. The community already supports a high number of people with particular needs and has a high density of single occupancy accommodation arrangements already. We have in recent years seen a rapid expansion in the number of homes turned into flats. These have been done well but there is a balance and a 'tipping' point that can affect and change the positive sustainability of a community. The two properties next to Elton Lodge are Houses of Multiple Occupancy (HMO's). That will mean the top half of the road has 2 existing HMO, 7 flat blocks (plus a house converted into two flats) and 4 family homes.

Of course it may be claimed that the cost of 'refurbishment' or development of Elton Lodge as a nursing home again is uneconomic (despite interest having been shown). However, if it is to be accepted that we lose the local employment such a substantial nursing home provided then we propose that alternative 'family housing' developments must be supported.

The area needs families in family homes that are here 'longer term' to keep the community well balanced. This is our personal view but it is also well supported by Councillors as presented in the Core Strategy.

At 3.44 we are told that there is an "imbalance in terms of the housing within the town. There is a low stock of larger properties and that a significant number of family homes have been lost through redevelopment and conversion in recent years". If the nursing home is to remain closed, we propose that the site should be developed to provide 2 or 3 bed-roomed family homes. The strategy emphasizes the need to have the "right mix of housing" and we propose that a 22 bed-roomed 'block' cited immediately next to other large HMO's is not respecting the need to find the 'right mix'.

"...developments present a unique opportunity to bring forward a balance of new housing... including more family housing than has been achieved over recent years". (at 3,47)

We have excellent local schools, both primary and secondary, and exemplary health care services. Children would be able to access both without need of transport and have the incredible seaside as playground. Objective 4 of the strategy says "family homes [must] be retained in appropriate locations". We believe Selden Road to be a very appropriate location for some family homes that will also help demonstrate improvements in the LNIA. Indeed the strategy says (at 7.9) it is "imperative" that family homes are brought forward to provide "diverse housing that contributes to sustainability of communities". Further emphasized at 7.10 and 7.11 it says the main objective is stop the domination of small flat developments and ensure they are not the principal type of development in the town.

The introduction to the Strategy states "...decisions are not made in isolation, but are properly co-ordinated with a focus on promoting the principles of sustainable communities with meet the diverse needs of existing and future residents and are sensitive to their environment, and contribute to a high quality of life".

We can only hope the introductory statement in 2011 of a vision for Worthing through to 2026 holds true today. Councillors have the very important role of making decisions that can determine whether a community flourishes and thrives or slides into HMO wilderness.

If you support the view that the community is better served either by the existing nursing care home providing employment opportunities or the development of a row of terraced family homes as opposed to a very squashed 22 bed-roomed 'dwelling' that in no way will provide a decent quality of life then please register your concerns on [Planning Application website](https://piannina.adur-worthing.gov.uk/onfine-applications/) at <https://piannina.adur-worthing.gov.uk/onfine-applications/> the planning reference is AWDM/1828/15

Alternatively, if it is easier for you, please just sign this letter and drop it through our letter box (No 20) and we will submit it as your objection to the proposed development along with ours at the end of the week. If you chose that option, you will need to write out your name and address as well as signing it — the council will

not accept it as 'another persons' comments unless identified with individual names and addresses.

Planning Appraisal

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; and

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.

The main issues for consideration are:-

- i) The loss of a care/nursing home and principle of conversion to HMO
- ii) The impact on the character of the area and amenities of future and neighbouring occupiers including anti-social behaviour.
- iii) Impact on access and parking.
- iv) Other environmental impacts

The Core Strategy, including Worthing Saved Local Plan policies, comprises the Development Plan here but the Government has accorded the National Planning Policy Framework considerable status as a material consideration which can outweigh the Development Plan's provisions where such plan policies are out of date; or silent on the relevant matter. In such circumstances paragraph 14 of the NPPF states that where the proposal is not otherwise in conflict with specific restrictive policies in the Framework, development should be approved unless the harm caused significantly and demonstrably outweighs the benefits when assessed against the NPPF overall.

The Council's self-assessment of the Core Strategy's Conformity with the National Planning Policy Framework demonstrated that, in many respects, the Council's key Development Plan conforms closely to the key aims and objectives of the Framework. However, it is acknowledged that in response to the requirements of the Framework and informed by local evidence it is clear that Council cannot demonstrate a current 5 year supply of housing in respect of Objectively Assessed Needs and the Council needs to assess the housing delivery strategy set out in the current Development Plan. A Housing Study has been published to this end. A revised Local Development Scheme which commits the Council to undertake a full review of the Core Strategy and prepare a new Local Plan for the Borough has been produced.

As such the proposal should be principally assessed in relation to the presumption in favour of sustainable housing development as set out in paragraphs 14 and 49 of the NPPF and informed by saved Worthing Local Plan Policies H18; TR9 and RES7 and Core Strategy Policies 7, 8, 15 and 16, and The National Planning Policy Framework.

Principle of loss of care/nursing home and conversion to HMO

There is an acknowledged growing need to provide care/nursing home accommodation for the elderly, notwithstanding the extensive provision already made in the borough. However, there are no policies protecting care/nursing homes in the Core Strategy and the principle of loss could not be resisted. Accordingly, there is no requirement to demonstrate unviability but the applicant has indicated that resumed use of the building as a care/nursing home would not be viable due to the costs involved in meeting the requisite standards and age and condition of the building. In support of this he has explained that marketing for over a year was undertaken but no offers received for a care home, despite price reductions.

Neither, are there are any specific Development Plan policies directly governing HMOs in the Core Strategy, other than the broad and generally supportive Core Strategy Policy 8 which includes the statement; *The Core Strategy will deliver a wide choice of high quality homes to address the needs of the community.* This would include HMOs and to this extent the proposal would advance this broad aim.

Provision of HMOs as proposed is not inconsistent with the geographical preferences of Core Strategy Policy 8 and supporting Guide to Residential Development Supplementary Planning Document. These accept that higher density housing (which would include HMOs) is appropriate in and around the town centre. Selden Road, being less than 400 ms from the eastern boundary of the town centre and on the door step of the Hospital falls into this category of “around town centre. “ As a neighbourhood, it has a strong established presence of NHS (nurses) bed sit accommodation in Lyndhurst Rd and Horton Court, as well as market bedsits and residential institutions, characteristic of such areas, alongside the family housing. The fact that the applicant reports the marketing of the property did not attract any offers for such residential conversion is consistent with their claims over the unviability of conversion to flats/houses.

That said, conversion to flats or family houses would be supportable under Core Strategy Policy 8 and would equally meet a recognised need but cannot be compelled.

There is increasing recognition that HMOs/bedsits do meet a rising market demand for low cost, if basic, residential accommodation. The cost of accessing home ownership; the shortage of social housing to rent; economic hardship and structural changes to the economy, as well as reforms to the housing benefit system have all contributed to increased demand for this type of affordable and flexible, if lower quality, accommodation. Certainly, such accommodation has been and continues to be important for many of the poorest and most vulnerable in society but also key workers and those requiring short term lets for work or other reasons. The demand for such accommodation in and around the town centre and inner suburbs is evidenced by the increased registration of HMOs by Environmental Health Officer and granting of recent planning permissions at 2-4 Southey Road and Queens Lodge, Queens Road.

Provision would contribute marginally to meeting the Borough's housing provision target in Core Strategy Policy 7 but more particularly to the growing need for low cost small accommodation in the town and this weighs importantly in the balance.

The impact on character of the area and the amenities of future and neighbouring occupiers, including anti-social behaviour

The proposal involves no significant external physical works and so issues such as overlooking between neighbouring properties would remain unaffected.

The main potential for impact would be the way in which the accommodation was used and how that impacts on the area.

Certainly, this would be a large HMO. However, the planning history indicates that the whole of the property has been used as a residential institution from 1987 onwards and No 22 was in use as bedsits before that. In some ways the intensity and character of the proposed HMO use is not considered to be so significantly different to the historical use of the property, bearing in mind the similar number of rooms/occupation as the care home and visitors and care staff who generated traffic/activity.

Nonetheless, concerns are understood over potential impacts upon the residential character of Selden Road, not least through anti-social behaviour problems and changes to social balance brought about by a large HMO.

The Police in the form of the Crime Prevention Design Adviser have, principally, commented on the application in respect of the physical ways in which the property can be made secure and safe and deter crime. However, he does note that *the level of reported crime for Worthing is just peaking above average when compared to the rest of Sussex whilst crime levels at this location are low when compared to the surrounding areas*. He does not comment on clustering of HMOs but does note: *Historically there are cases where HMO's have given rise to instances of Anti-Social Behaviour (ASB). To reduce the risk of this occurring there will need to be stringent management control of tenancies. This could be implemented as a condition of planning*.

Whilst the Safe Communities Team raise concerns over *concentration of people/dwellings in a small space and would be detrimental to the demographic of the current area*, no specific evidence to link this in this instance with increased risk of anti-social behaviour problems has been advanced. In commenting on a recent previous application to convert Queens Lodge, Queens Road, to a large HMO, the Safe Communities Team noted HMOs were an issue for the West End Local Action Team covering that area in the sense that there was a concentration of housing that is deemed poor and that the community is very transient. Some HMOs had been troublesome in recent times, mainly due to the nature of the placements. This had been of particular issue when care leavers/ independent living schemes have used HMO's and there had been little to no supervision for those who are very vulnerable/ unfamiliar with living without supervision.

The views of the Police Inspector involved in the West End LAT in the same application for 10 bedsits at Queens Lodge Queens Road remain relevant on the

link between HMOs and anti-social behaviour. Whilst he had concerns about the wider issues, including impact of the street community and unlawful drug use/supply, he had no formal objections to the proposed new HMO. This was upon the basis that there is no evidence to suggest the new HMO would lead to an increase in crime and disorder, although their experience suggests some HMOs can be problematic and are not always desirable. However, he noted this very much depends on those who eventually occupy the building.

This is echoed by the comments of the Environmental Health Officer who has advised that the applicant has engaged with them prior to submission and is confident that the property will be free from serious hazards and comply with the Management of Houses in Multiple Occupation (England) Regulations 2006. He also notes the real prospect of extending regulatory controls over such accommodation in reforms currently being entertained by Government. Above all, he notes that *It is my experience that a well maintained and managed property is less likely to experience issues of antisocial behaviour, particularly in the long term.*

No figures on levels of HMOs in the Selden Road broader area have been supplied by the Environmental Health Officer but it is noted that there appeared to have been only 40 true HMOs (i.e. bedsits/shared houses) in the West End Local Action Team area, in the order of 2% of dwellings in that area. This clearly represented a low level of geographical concentration, whatever appearances and for the wider Selden area, it is doubtful if this is significantly higher.

Whilst a run of three HMOs would result from the proposal (Nos 26, 28 and the application site), this, in itself, would be insufficient justification for resisting the proposal on clustering grounds, without real evidence to support contentions of demonstrable harm.

The abiding view remains that the risk of antisocial behaviour problems relates directly to the quality of the management and cannot be presumed.

The supporting statement by the applicant appears to also give some reassurance over management and includes the aspiration that; *Elton Lodge will be transformed into a High End HMO providing affordable, safe and well managed rental accommodation for professional workers within the town.* That said, it would not be appropriate to seek to control the type of tenants who occupied the bedsits or the management regime. It would, nonetheless, be appropriate to restrict the use so that the property was not subsequently converted to a hostel or residential institution.

Turning to the regulation of HMOs under other legislation, the Environmental Health Officer has previously explained in response to other similar applications the safeguards available under other legislation including Parts 1 and 2 of The Housing Act 2004; The Management of Houses in Multiple Occupation (England) Regulations 2006; and Section 79 of The Environmental Protection Act 1990. This suggested such controls are adequate but did further advise that there are powers under the same Act for Councils to introduce selective or additional licensing of HMOs in areas where there is evidence of persistent anti-social behaviour problems or allied ineffective management of HMOs. The case for such is subject to ongoing review.

In terms of planning controls, whilst some metropolitan authorities have Plan policies governing *studentification* of certain neighbourhoods where problems related to character/ crime and disorder/ access to housing arise, the Council has no Development Plan policies which specifically seek regulation of HMOs and other uses such as care homes/hostels and facilities for vulnerable groups on such grounds. It may be appropriate to review the case for such (and any case for any allied Development Order to remove current permitted Development Rights which allow any house to convert to an HMO of 6 bedsits or less without the need for any planning application) in the forthcoming Core Strategy Review process but current indications of densities offer limited support for this.

That said, the neighbour amenity, including anti-social behaviour, is a legitimate concern on all applications and is subject to the general tests of saved Worthing Local Plan Policy H18 and The National Planning Policy Framework. However, from the above it is apparent that there is no compelling evidence of existing problems which would likely be unacceptably exacerbated by the proposal. Accordingly, a refusal along these lines would not be justifiable. Nor would it normally be appropriate to control such matters as type of tenants, especially given the controls available under other legislation.

It is noted that a similar application (AWDM/0467/15) to convert a nearby care home at The Victoria Parkview, 7 Madeira Avenue to 10 bedsits was refused contrary to officer's recommendation at the July 2015 meeting of the Planning Committee, amidst similar concerns by residents over the impact on the area of another HMO. The grounds for refusal were:

The proposal by virtue of the number, size and type of bedrooms proposed and the lack of adequate kitchen, washing and bathroom facilities fails to provide a wide choice and mix of high quality residential accommodation to address the needs of the community. The proposal therefore fails to comply with Policy 8 of the Worthing Core Strategy and the National Planning Policy Framework which seek to provide a wide choice and mix of high quality new homes.

This is centred on the quality of the facilities themselves rather than the principle of an HMO; geographical concentrations of such or changes to character/impact on anti-social behaviour.

This is not an issue in the case of the current application as the Environmental Health Officer indicates it complies with relevant requirements and it is apparent that the property overall provides an acceptable quality of accommodation in itself; is close to all facilities and benefits from a garden.

The size of the HMO overall is rather large in this case and exceeds the Government Guidance on designing out crime in HMOs through the Secure By Design scheme which discourages HMOs of more than 6 bedrooms. However, such large HMOs are not without recent precedent. Planning permission was granted in 2014 to convert a former care home to 25 bed sits at 2-4 Southey Road under AWDM/0271/14 in a town centre fringe area where flats, HMOs and residential institutions increasingly prevail and not too dissimilar to the Selden Road area.

The fact that the site falls within Local Neighbourhood Improvement Area - groups of electoral wards within West Sussex, which have been locally identified as the most deprived areas in the county is noted. However, The Communities Team advises this is not amongst the most deprived in the borough, nor is it a priority for action. Nonetheless, the provision of low cost housing as proposed would help meet a recognized local housing need.

Refuse storage arrangements appear to be satisfactory and can be controlled by condition.

Impact on access and parking

Concerns over parking pressures are noted, especially in the light of the proximity to the hospital and Pub.

However, the site is sustainably located close to the town centre, public transport and local facilities.

Parking demand from an HMO in such circumstances is likely to be substantially less than the maximum standards prescribe (0.5 spaces per bedsit) of 11 spaces.

Whilst this is more than the 8 or so spaces prescribed as the maximum standard for a care home, the difference is not that marked.

The applicant has amended his plans to retain the existing vehicular access and include one formal parking bay in the drive but there is physical space for up to 3, whatever the practicalities of managing this space.

Here it is with noted that, with just 3 parking spaces, the care home appears to have operated without ill effect against the parking notional shortfall, presumably using the street to meet any overspill demands.

The applicant aims to do likewise and has submitted an on-street parking capacity survey to demonstrate that sufficient capacity exists locally overnight when existing Controlled Parking Zone controls do not apply and pressures are perhaps greatest. The fact that there is no waiting list for residents' parking permits in this zone also suggests adequate parking supply and many of the properties in the road benefit from off street parking anyway.

The proposed secure sheltered parking will also support modal choice and help dampen the demand for car use.

On-street parking is, in any event, regulated by the Controlled Parking Zone and the property's wide street frontage itself provides 4 parking bays.

The proposal does not alter access arrangements.

The Highway Authority raises no objections.

Due account of the potential impact of the proposed development at 39 Selden Road had been taken.

The test in the National Planning Policy Framework states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Officers share the view of the Highway Authority that it is not considered that the proposed change of use application would give rise to an impact that could be considered 'severe'.

Other Environmental issues

The site is not in a recognised flood risk area.

Conclusions

The loss of the care home is regrettable but cannot be resisted. An HMO is not significantly out of step with the history of the property's use and meets an accepted need for such. The Environmental Health Officer is satisfied that the accommodation is adequate and there are satisfactory regulatory controls to avoid harm to neighbours. Whilst concerns over changes to character are understood, no compelling evidence of existing anti-social behaviour problems which would likely be unacceptably exacerbated by the proposal have been advanced. Access and parking are acceptable.

Recommendation

Approve subject to the following conditions:-

1. Three years to implement use.
2. Implement in accordance with approved plans.
3. Provide car and cycle parking and domestic waste storage
4. No use for hostel or residential institution

Background Papers

Observations by the Highway Authority
Observations by the Drainage Engineer
Observations by the Environmental Health Officer
Observations by the Police; Crime Prevention Design Adviser
Observations by the Safer Communities Team
Representations by Members of the public

Application Number: AWDM/1111/14

Recommendation – APPROVE

Site: **Builders Yard North of 14 Highfield Road Worthing**

Proposal: **Continued use of premises for printers and allied office and storage and allied improvement works including retention of single storey side extension, replacement of existing attached front storage building with new flat roofed building, single storey extension, construction of new front garage and reconstruction of south boundary wall with new entrance gate.**

Applicant: Mr Duncan Aspden
Case Officer: Peter Devonport

Ward: Tarring



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

Site and Surrounds

The site is a small, L- shaped, former builders yard (278 sqms in size) at the northern end of Highfield Road, close to Poulter's corner and occupied since the spring of 2015 as a printers and allied office and storage.

The site comprises four elements. Firstly, an open area at the front where access via a pair of large mesh gates is located. Secondly behind this, an open fronted and part open-sided tall single storey structure spanning the width of the site and a legacy of the former builders yard, where materials/etc were stored. Thirdly, beyond this, a two storey pitched roof building, historically used as a workshop for the former builders and now used primarily for offices with some ancillary storage and printing/assembly. This was refurbished in the winter of 2014 and spring of 2015 and retains several windows, includes a pair of doors, at first floor level facing westwards (to the front) as well as one window south. Lastly, where the site wraps

round to the south adjacent to the two storey building on land formerly used by the builder's yard for enclosed storage, a flat roofed single storey side extension to the main offices has also been added recently, similar to a scheme approved under a 2003 planning permission (WB/02/01371/FULL).

It is flanked by a vehicle repair garage to the north, which has recently seen the demolition of a substantial outbuilding close to the common boundary, which itself has been recently rebuilt. Vehicular access is obtained from Highfield Road.

To the east is a block of lock up garages in the rear service yard of a block of flats fronting Rectory Road.

To the south is an end of terrace Edwardian house converted into 2 x two bedroom flats in (07/1531/full) 2008. The flats are set back from the common boundary with the builders yard by a side passage which also wraps around at the rear and serves both the application site and the flats. The boundary itself is marked by a one metre plus tall brick wall and the storage structure and two storey building and the closest part of the rear yard to the flats is screened by a taller solid timber fence behind the passage and adjacent to the application site's side extension. Whilst there are windows at the rear of the flats (including two serving bedrooms at first floor), the one ground floor window directly facing the site (ie north elevation) serves a kitchen and is high level and the one first floor window facing north serves a landing. The upper floor flat to the south is accessed via an external stairs at the rear with small balcony.

Apart from the garage and builders yard, Highfield Road is a residential street comprising attractive Edwardian houses, some converted to flats and a care home. There are no parking restrictions in the street.

There is limited planning history with permission granted in 1970 for the storage enclosure and the permission for the side extension in 2003. The builders yard's operation is otherwise unrestricted.

The Proposal

The proposal as originally submitted was prospective as follows:

Change of use to office and storage and distribution centre for printing business. Refurbishment and reconfiguration of existing covered store including two-storey front extension to west elevation, single storey side extension to south elevation and erection of garage at entrance of site.

However, as the property has been occupied and operational from the spring of 2015, the application is now part retrospective in that it seeks to regularise the primary use and the building works already carried out (i.e. refurbishment of two storey building and construction of new side extension).

The application remains partly prospective in relation to the proposals to replace the single storey front storage building; build a new front garage and construct a new boundary wall with No 14.

The form of the proposed physical works has been revised over time. Original plans to build two storey front extension have been downscaled to the replacement front extension. The side wall is however a feature of the revised scheme.

The nature of the proposal has been clarified since the original submission. As it now stands, it comprises a printers but for the most part laid out and used as offices with ancillary storage and distribution for a printing business. It replaces the former building yard which had been vacant for some time.

The stated current machinery used is as follows :

- Three Xerox 7400 Phaser office type printers
- One Ideal 4810-95EP guillotine
- Three table top padding presses
- Three manual Renz DTP wire binders
- One Vacuumatic tabber
- One Horizon perfect binder

The applicants report any other machines that they purchase will be of the same type as the above and will be bought just to improve efficiency and productive capacity - at no stage will litho printing presses be used.

Crucially, main printing is off site.

The retained rear two storey office building and the single storey side extension is used for offices, albeit the upstairs of the two storey building is not operational at the moment. Windows have been replaced at first floor and ground floor level facing west and south together with rooflights. A walled garden is to be formed in the curtilage of the single storey extension abutting the southern boundary with the flats in Highfield Road.

The proposed single storey front extension (replacing the existing storage building) is flat roofed and would be used for ancillary office/meeting room as well as distribution and storage and possibly a limited amount of printing and assembly. This is 9.5 to 10 ms long and 3.1 ms tall and spans the width of the site. This would have glazed door to the west and high level windows on its flanks, including glazed part roof on its southern side. It is to be rendered with felt roof and minor element of cladding.

The new flat roofed front garage is 6ms long, 4.3 ms wide and 2.5 ms tall. It is windowless but incorporates gates at each end.

An open yard would be retained between the garage and single storey front extension.

Stated operational hours are 8am to midnight all days but the applicant has agreed to limit these to 8am to 6pm Monday to Friday and 9am to 5pm Saturdays but allowing office use only up until 9pm on such days.

Five staff are to be employed.

The boundary wall to the south would be increased in height to 1.8 ms and rendered with timber panelling above and incorporates a gate from the adjacent path.

The rationale for the current application and the nature of the business proposed have been clarified by the applicant in the following statement.

1) Four of the staff are family - we have space for three vehicles - one in the garage, one on our drive and the other blocking the drive. No-one will be affected by staff vehicles

2) Any work outside normal hours will purely be office work

3) Deliveries and collections will take place in normal working hours. Vehicles will be unable to access the site and the garage will be a drop off and collection point

4) Our in house printers are digital machines which make no more noise than a normal office printer - there is no noise to mitigate

We are a family business that have rented premises in Washington for the past three years and our lease on those premises expired on 11/12/14. In the summer of last year I decided that I would like to buy a property from which to run the business rather than paying rent. We saw the premises which are the subject of the application and thought they would be ideal bearing in mind the previous use and the potential for expansion on the site. As a Company we are relatively small but do have ambitious expansion plans one of which is to move into Europe, America and Canada which is an area that we have recently started to explore.

I need to make it clear that we do not, nor have any wish to, start a printing business. I am unsure where this mis-representation has come from but we do not and will not have printing machinery on the site other than two or three normal Xerox printers for doing drafts for Clients etc. The premises at Highfield Road will purely be used for design, marketing, administration, accounts and padding – no more than any other office. ...I want to clarify that the existing and new (applied for) extension will be office use.

As far as the opening hours go I feel again that this needs clarification. We are a family business and I personally do other work apart from assisting with Branded Pads. All my work is office based and there are times (in fact quite regular) times when I work from my office at night – such as now for example. Any work that will be done outside normal office hours will be more or less the same as anyone else would do with a home office computer and will affect no-one in the neighbourhood in any way whatsoever.

The objections seem to relate to there being a business in the premises in the first place and I do agree that it is a residential area but one that is nevertheless suitable for offices. We will have enough room in the existing premises (including the new extension currently being built for which PP is already in place) for the next six/twelve Months so, even if permission is granted, work will not take place for some time. If you believe the objections are justified and you feel the application is more suited for residential use then we can see how the business expands during

2015 and if things go as planned, look for alternative premises and reapply on that basis.

Planning History

Application Number	Development Description	Decision	Decision Date	Appeal Decision	Appeal Decision Date
02/01371/FULL	Demolition of single storey timber building and construction of a brick replacement building and new WC's and alterations to existing two storey building	GRANT CONDITIONAL CONSENT	05-02-2003		

WB/74/70 Alterations and erection of roofing over existing builders yard Approved 3.2.70

Consultations

Highway Authority

The change of use from a builder's yard to a printing business has been considered by WSCC as the Local Highway Authority. WSCC raise no objection subject to any conditions attached.

The impact on the highway would not cause any material capacity issues, nor does it raise any highway safety issues and the former use as a builder's yard would have been more intensely used.

The applicant proposes to employ 5 people, and parking of these vehicles to take place on the properties driveway, or on-street. The applicant has said that there will be no client or supplier visits to the site; and the largest delivery vehicle would be a small van.

In summary the proposed change of use will not create an intensification of use as such WSCC raise no objection. The Local Authority should make sure that any parking or loading/unloading of vehicles associated with the implementation of the refurbishment shall be contained within the site to avoid congestion on the highway and avoid obstruction to the access.

Environmental Health Officer

Condition the application to the details stated in his email and the quiet work can go till midnight (external lighting necessary?).

Representations

Objections have been received from, principally to the earlier scheme from 4, 13 and 14 Highfield Road (including owner); 3, 17 Chantry Road; and Becket Road Residents Association; raising the following concerns;

- Building works at unsocial hours and disturbance and disregard
- Occupiers of flats at No 14 Highfield Road are young families
- Over development that will enclose garden of No. 14 and overlook garden
- This area is already blighted by traffic using the roads to cut through. It is a residential area and to allow a business such as this to operate will mean additional traffic, parking and noise including heavy vehicles collecting and delivering.
- Any change of use should be for residential use to be in keeping with the surrounding area.
- If the plans have to be approved this should be done so only with strict conditions on when the premises can be used (both for deliveries, parking and printing), level of noise permitted restricted to low levels and appropriate glazing installed to reduce noise levels. Large vehicles should only be allowed access directly to and from the Littlehampton Road and not via Highdown Avenue, Chantry, Highfield or Northfield Roads and not permitted to park in Highfield Road.
- Lack of understanding that the applicant has for what is a solely residential street, excluding the care home which also houses elderly people.
- The property has always been a builders yard and of commercial use, however it was never intended to be used for anything more than a builders yard, as going back to the history of the street of which the applicant has no obvious knowledge it was the original builders yard which the builders used over 100 years ago to build the houses in this street.
- They say that they are expanding and that 95% of their printing is being done at factories away from the office and delivered to them a couple of times a week, where they then collate the goods and make ready for delivery to clients. This means that there will be extra commercial traffic delivering 95% of their products to the property and their products being sent out from the property by commercial means. The road is a very narrow residential street we live in where our children cross to play with neighbours and is not suitable for commercial vehicles to come in and out a couple of times a week as quoted by the applicant.
- By extending the building there will be no parking space for their staff on the drive way of the premises and as it is there is a shortage of parking for the residents who live in the street, never mind a commercial property with a number of staff, clients, commercial deliveries, etc.
- Hours of operation between 06:00 and 23:59, which is absolutely ridiculous in a residential area, regardless of their noise levels.
- By extending at the side they will be overlooking all the gardens of the side of the street the property
- This scheme will not be an improvement but will create more irritation for the residents and friction between the owners of the property and the residents. It is not fit for commercial use as a Printing company and the extensions proposed are not acceptable.

- strong objection of the double story extension and garage, as the double storey extension will allow for direct views into our garden and the garage will not enhance the image of a classical residential street but will also create parking issues in the street.
- will increase commercial traffic in a residential street with young children around, decrease residential parking of residents who live in the street and disrupt a civil right to privacy within one's home
- This property was built as a builder's yard and has been operated as such for decades. At the height of its business, there would be 1 or 2 vans loading at around 8:00am and unloading at around 4pm, with occasional visits to the yard during the day. All loading was done on site. The office was operated by one or two personnel whose vehicles were parked on site.
- Highfield Road is a small residential side road that has already been allowed to develop way beyond that which the infrastructure can cope with.
- The plans make no provision for on-site parking. The application states there is currently no on-site parking - this is incorrect. Presently there is room for at least 3 vehicles to be parked on-site. The plan states 5 members of staff - where will they park? Highfield Road is at bursting point as it is.
- There is no provision for on-site loading - where will goods be loaded? I can only assume this will have to take place on the road which, given the parking issues as noted above, could cause traffic obstructions, and potentially be dangerous for ambulances accessing Bay Trees Nursing Home.
- The proposal is for it to change to a manufacturing facility. The application makes no provision to protect the neighbourhood from being seriously damaged by noise.
- Previous highways dept. surveys of the road concluded that traffic levels were unacceptably higher than usual for a road of this type. Allowing this development will make this worse due to the vastly increased activity on the site.

Becket Residents Association

Becket Residents' Association represents the majority of households (active membership of 73 households - approximately 75%) in the five streets surrounding and including the proposed site. In common with some other recent planning applications we have serious concerns about the impact of extra traffic and on-street parking brought about by commercial businesses either starting up or expanding in our compact residential streets. You will by now be familiar with our views on the 'rat-run' situation that afflicts our area.

Feedback from our membership points to two main topics of concern: Additional parking demand in Highfield Road.

The Supporting Statement says that "our own vehicles would be kept... in the appropriate parking space for the property on the road." We submit that in this street that is already crowded with on-road residential parking, we can see no appropriate parking space. We would therefore urge the Council only to approve the application on condition that there is no on-road parking impact. We also note that there is no statement of parking provision on the site in the Application, so if all 5 employees come to work by car, this would place pressure to park on-street. Residents of Highfield Road are already blighted by on-street parking by employees of Becket Motor Works and Baytrees Nursing Home.

Hours of Operation

The planning permission sought by the Applicant is for operation is from 8am until 23.59 and 7 days a week. This is inappropriate and unacceptable for the residents living adjacent and opposite the site. We believe normal office hours of operation be imposed as any condition of planning approval.

Response to latest revisions

14 Highfield Road

I can see nothing within the amended plans that satisfies me that any of the concerns raised previously by neighbours have been addressed. The amendments fail to provide adequate parking and will increase congestion in the area. Operational hours also appear to be unchanged. All my previous concerns raised remain.

Planning Appraisal

The main issues raised by this application are;

- Principle of change of use
- Impact on amenity of neighbouring properties
- Visual impact
- Traffic and parking impacts
- Other environmental impacts

As such the proposal should be assessed against Core Strategy Policies 4 and 16 and Saved Worthing Local Plan policies RES7, H18 and TR9 and National Planning Policy Framework and allied Practice Guidance.

Principle of change of use

The previous use as a builder's yard was possibly a B8 use (storage/distribution) but more likely a sui generis use, comprising a mix of office /storage and workshop. Its operation appears to have been unrestricted.

A change of use to one of primarily offices with ancillary storage and printing, as part of a wider printing business is more likely to be a B1 use but may also arguably fall into a mixed sui generis use itself.

The resumption of a business use at this long established employment site after a period of vacancy is welcome.

The proposal will provide jobs and contribute to the local economy.

To secure business use, a condition to prevent any future use of Permitted Development rights to residential purposes is justified.

Impact on amenity of neighbouring properties

The site is located in a transitional area between the Neighbourhood centre at Littlehampton Road, flanking a garage business to the north and garage court to the east but is also close to flats to the south and opposite and Highfield Road is an overwhelmingly residential street.

The character of the new business use is one that lends itself to such a location-essentially an office use, low-intensity with only modest and ancillary storage and printing operations. This is underlined by the fact that whilst initial reactions to the prospect of the new use were hostile from local residents and complaints were received in winter of 2014 and early 2015 over the disturbance caused by the actual building works so far undertaken, no complaints or objections have been received over the actual use since it started in earnest in the spring of 2015, despite re-consultation (though none of the earlier objections have been withdrawn either).

The important exception is from flat 1 at No 14 which is closest to the site of all neighbours. In March 2015, these occupiers remained opposed to the principle of the use, whilst raising specific objections to the two storey extension then proposed (and now withdrawn); traffic and general disturbance. A response to the last round of consultation in December 2015 echoed previous objections including parking and operational hours.

It is also instructive to compare the proposed use with the very real fallback scenario of resumed use as a builder's yard which would have the potential to be a source of disturbance as the use is unrestricted.

The use appears to have bedded down without significant impact of its operations on any neighbour. Safeguards to control operations may be secured by condition. These would include restricting operational hours to 8am to 6pm Monday to Friday and 9am to 5pm Saturdays but allowing office use only up until 9pm on such days; no access on to the roof of the existing or proposed single storey building in front of the two storey building except for emergency and maintenance; prevent any printing equipment other than that listed by the applicant as used except as agreed in writing by the Local Planning Authority; and controls on any external lighting.

Turning to the physical works, the refurbishment of the existing two storey building does not materially impact on any neighbour with pre-existing openings more or less unchanged.

The single storey side extension is similar to that previously approved and is actually smaller. It is well screened from the adjacent neighbour.

The replacement front extension is similar in siting and form to the existing. The south facing windows are largely screened by the proposed raised boundary wall /fence and construction of such may be secured by condition. The impact is far less than the two storey extension originally proposed.

The front garage is domestic in scale and follows the building line. For the most part, it adjoins a blank flank wall of no 14, the exceptions being a landing window and high level kitchen window to the ground floor flat. Given the garage sits to the north and respective distances and form of the window, no unacceptable impacts on outlook or natural light would arise.

The raised common boundary wall provides security and screening for the adjacent flats adjacent to an established access path. The new gate does not impact on amenity or security.

A condition to prevent any further openings in the south side of the garage; and single storey front extension and south and east elevation of the two storey building is justifiable in the interest of privacy.

Visual impact

The new physical works largely replicate those existing or approved. The front garage is domestic in scale and respectful of building lines. The works harmonise well and would improve the appearance of this otherwise vacant and tired looking site.

Traffic and parking impacts

The existing access is unchanged and a hardstanding retained in front of the garage.

The proposal makes limited provision for parking and there is equally limited provision for servicing.

However, traffic demand from staff, visitors and deliveries appear to be very modest for this generally low intensity use. Again the situation should be compared with the fallback of any resumption of builder's yard use where deliveries could be more intensive.

Highfield Rd is recognised as a rat-run but this proposal is unlikely to materially affect matters.

The Highway Authority considers that no material intensification would result and offers no objections.

Other environmental impacts

The site is next to a garage which is identified as potentially contaminated and so a precautionary condition is recommended.

Surface water drainage may be addressed by condition.

Recommendation

Approve subject to conditions (summary)

1. 3 years to implement
2. Build in accordance with approved drawings
3. No use for printing other than ancillary to the office use and such use limited to use of the following equipment except as agreed in writing by the Local Planning Authority

Three Xerox 7400 Phaser office type printers

One Ideal 4810-95EP guillotine

Three table top padding presses

Three manual Renz DTP wire binders

One Vacuumatic tabber

One Horizon perfect binder

No use of litho printing presses.

4. Restrict operational hours to 8am to 6pm Monday to Friday and 9am to 5pm Saturdays but allowing office use only up until 9pm on such days
5. No access on to the roof of the existing or proposed single storey building in front of the two storey building except for emergency and maintenance
6. No external lighting
7. No occupation of the replacement front extension unless and until the raised boundary wall /fence has been built.
8. No openings in the south side of the garage; and single storey front extension and south and east elevation of the two storey building.
9. Agree and implement surface water drainage
10. Precautionary land contamination
11. Notwithstanding the General Permitted Development Order no permitted use for residential purposes.
12. Details of facing materials.
13. Method statement for construction/demolition works including dust suppression.
14. Restrict hours of construction /demolition to 8am to 6pm Monday to Friday.

9th March 2016

Application Number: AWDM/1848/15

Recommendation – REFUSE

Site: Ground Floor Flat 130 Rowlands Road, Worthing

Proposal: Single storey rear extension

Applicant: Mrs Elizabeth Wade
Case Officer: Rebekah Smith

Ward: Heene



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

Proposal, Site and Surroundings

The site relates to a semi-detached two storey house on the northern side of Rowlands Road that has been converted into two flats. The property dates back to the 1900's and was converted to two flats following permission in 1962. The application relates to the ground floor flat. There is a small single storey addition at the rear of the main building. The adjoining dwelling at No. 128 has a slightly deeper rear single story addition and an attached rear store/shed building adjacent to the common boundary.

Permission is sought for a single storey rear extension following removal of most of the existing rear single storey structure. The extension would measure 7.92 metres

in depth taken from the existing two storey rear wall and 3.98 metre in width, set in from the boundary by approximately 0.3m. The existing side wall and part of the roof of the existing structure would be retained in its current form incorporated into the new addition and a new flat roof is proposed which would measure 3 metres in height approximately. There would be a roof lantern protruding approximately 0.5m above the height of the flat roof. A combination of matching brickwork and cedar cladding is proposed with PVCu windows and doors. The extension would form a new bedroom/sunroom and bathroom.

Relevant Planning History

AWDM/0822/15- Construction of garden shed to house mobility scooter. Approved 14.07.2015

AWDM/0515/15 – Proposed increased width of opening in front wall to allow vehicular access, dropped kerb, paving to front side and rear. Approved 04.06.2015

08/0747/FULL - Conversion of one bedroom flat into two self - contained flats with single storey rear extension and alterations to implement the use. Refused on 05.09.2008 for the following reasons:

The nature of the proposed access arrangements for the new two bedroom flat via the side passage would, by reason of the overlapping activity between occupiers of the new flats and the increased movement of people, be unsatisfactory and would lead to disturbance, visual intrusion and a loss of privacy between the two sets of occupiers as well as neighbouring residents. As such, the proposal would be detrimental to the amenities of the occupiers of the neighbouring dwelling (132 Rowlands Road) and the future occupiers of the proposed dwellings. Furthermore, the proposal would provide a cramped and unacceptable form of accommodation for the type of flats proposed, lacking in outdoor amenity space and would be detrimental to the living conditions of future occupants. As such, the proposal conflicts with Saved Worthing Local Plan 2003 Policies H13 and H18 and Saved West Sussex Structure Plan 2001-2016 Policy DEV1, and PPS1: Delivering Sustainable Development.

The proposed extension, by reason of its siting, design, layout and height, would fail to relate well to the existing property, representing a discordant and incongruous feature out of character and detrimental to the visual amenities of neighbouring properties. As such, the proposal conflicts with Saved Policies BE1 and H16 of the Worthing Local Plan 2003 and Saved Policies DEV1 and CH1 of the West Sussex Structure Plan 2001-2016.

Consultations

None relevant

Representations

Two identical representations have been received from the adjoining occupier at No.128 and one representation has been received from the owner/s of the first floor flat objecting to the proposal on the following grounds:

- Privacy, Light and Noise – concern that the extension would be overbearing and loss of light/overshadowing to neighbouring garden (the neighbour states that they plan to move their own shed because of overshadowing)
- Loss of general amenity – loss of garden amenity space for future occupiers
- Overdevelopment – concern that the size of the extension would be excessive in relation to the current flat footprint
- Out of keeping with the size and scale of other extension in the area
- Impact on trees and landscaping

A supporting statement has been received from the applicant which has been forwarded directly to Members of the Planning Committee and the applicant has sent several detailed emails and letters of representation in support of the application and responding to concerns raised.

Relevant Planning Policies and Guidance

Worthing Core Strategy (WBC 2011): 16
 Saved Local Plan policies (WBC 2003): H16, H18
 Design Guide 'Extending or Altering Your Home' (WBC)
 National Planning Policy Framework (CLG 2012)

Relevant Legislation

The Committee should consider the planning application in accordance with:

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; and

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.

Planning Assessment

Design and Visual amenity

The National Planning Policy Framework advises in paragraph 56 that 'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people', and in paragraph 64 that 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

Scale, density and site coverage are important aspects of design that contribute to the overall quality of the living environment. The proposal, which would extend 7.9 metres in depth into the rear garden (including the section that would replace and enlarge the existing bathroom) and at nearly 4 metres in width, would be

excessively large and result in a limited garden area of 7.5 metres in depth which would be uncharacteristic.

There is some variation to sizes of rear gardens in the vicinity of the site but generally the depth of rear gardens are between approximately 10 and 15 metres and are relatively narrow for the size of dwellings at between approximately 5.5 metres and 7.5 metres. Officers have suggested to the applicant that a reduction in the overall depth of the extension to a maximum of 6.5 metres (taken from the two storey rear wall) would be a reasonable compromise to meet the applicant's needs whilst allowing a more satisfactory garden area to be retained which would more closely follow the pattern of development in the vicinity and reduce the impact on neighbouring occupiers, but this has not been agreed to by the applicant and so the application is considered on the basis of the 7.9 metre deep extension.

Whilst the detailed design of the proposed extension and use of materials would not in themselves cause any significant harm to visual amenity, it is considered that the size of the extension and the resultant loss of the garden area would represent a cramped overdevelopment of the site which would set a harmful precedent in the vicinity of the site for similar proposals which cumulatively would be harmful to the character and appearance of the area.

Residential amenity

The use of the rear garden is purely for the ground floor flat and so although there is one rear window in the main rear wall of the building where a view of the extension may be possible, there would be no significant impact to the amenities of the occupiers of the first floor flat in terms of loss of light, outlook or privacy.

The adjoining dwelling to the east at No.128 has a single storey addition and timber shed/store attached to the rear of that, extending along the common boundary to approximately 6 metres in depth. Although it is noted that the neighbouring occupier, in their representation, states that they intend to move their shed because of overshadowing, the application must be assessed on the basis of the current site conditions. Although the proposed extension would be large and visible in part from the rear garden of No.128, the presence of the neighbours own rear structures act to enclose the rear garden at No.128 and there are no windows to habitable rooms that would be affected. The neighbours own rear additions would act to screen much of the development, avoiding any significant harm to the amenities of occupiers of No.128.

To the west, there is a separation distance of approximately 6 metres between the side walls of the two storey rear projections of No. 132 and the application property and a 1 metre high (approximately) wall forms the common boundary with some shrubs up to 2-3 metres in height within the applicants garden forming a hedge along part of the boundary. There is also a recently constructed shed within the application site adjacent to the boundary on this side. The depth of the extension has potential to increase the sense of enclosure and be overbearing to the neighbouring occupiers at No.132 where there are ground floor rooms served by rear and side windows which would be further enclosed by the proposed extension and where side windows in the proposed extension could overlook. However, the existing shrubs and applicants shed already encloses the area immediately outside

of the neighbouring windows, obscure glazing could be installed to avoid overlooking, and the neighbouring occupier has not objected, therefore on balance it is considered that a refusal would not be justified on neighbour amenity grounds alone.

Recommendation

REFUSE for the reason(s):-

Having regard to the scale and pattern of development in the locality, the proposed rear extension would, by reason of its excessive size, notably its depth in relation to the host dwelling and garden area, represent a cramped overdevelopment of the site. If permitted the proposal would set a harmful precedent for further similar proposals related to other dwellings in the site vicinity, the cumulative effect of which would be harmful to the existing character and appearance of the area resulting in overdevelopment. The proposal is therefore contrary to Core Strategy policy 16, Saved Worthing Local Plan policy H16, and the National Planning Policy Framework.

9th March 2016

Application Number: AWDM/0063/16

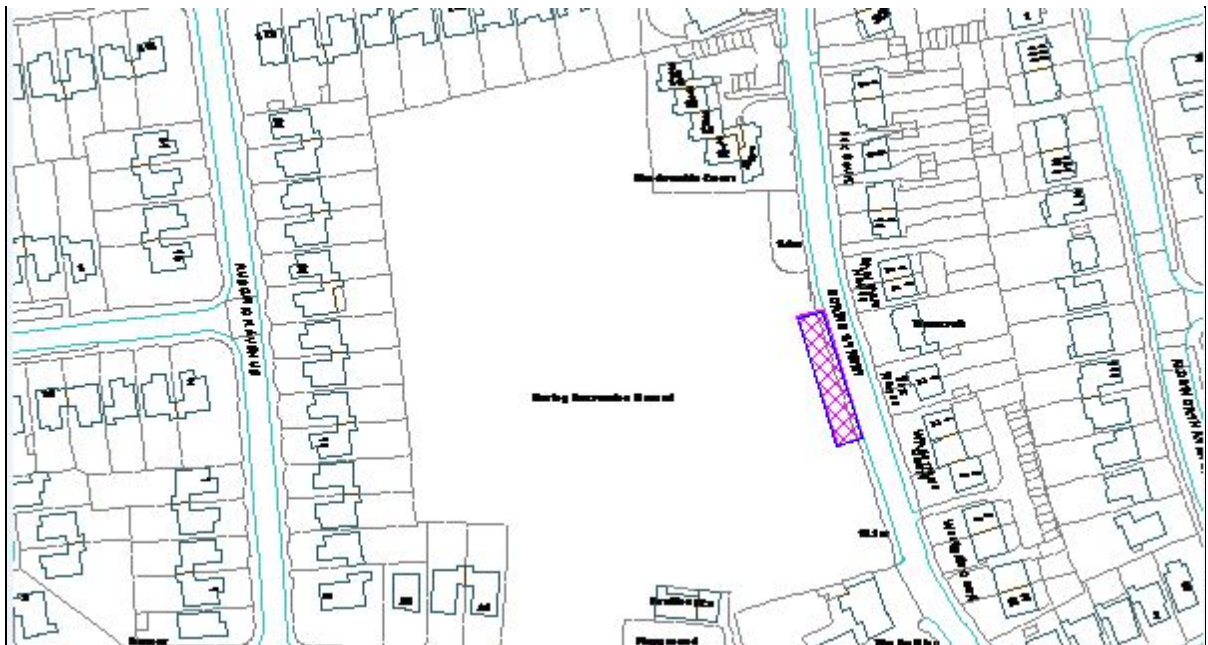
Recommendation – APPROVE

Site: Recreation Ground Goring Fernhurst Drive Worthing West Sussex

Proposal: 5 no. 10 metre high steel posts 10 metres apart; de-mountable netting between posts

Applicant: Mr Justin Tay
Case Officer: Eve Hearsey

Ward: Goring



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

Site and Surroundings

The application relates to Goring Recreation Ground which adjoins Goring Street to the east and Fernhurst Drive to the south. The Recreation Ground adjoins the rear gardens of bungalows in Goring Way and Rudgwick Avenue to the north and west. To the north-east it adjoins the grounds of Meadowside Court, a series of 3-storey residential flats. The Bull's Head Public House, a Grade II listed building lies to the south-west. There is a pavilion building to the south side of the Recreation Ground together with a children's play area and a cricket practice cage. There are trees growing around most the perimeter edges of the Recreation Ground.

There are 5 no. 10 metre high flag poles positioned adjacent to the eastern boundary with Goring Street, on the inner side of the line of trees along this boundary. These flag poles are used to attach netting, which is hoisted up when cricket matches are being played on the Recreation Ground to prevent balls straying across Goring Street towards the residential properties on the other side of the road. The flag poles are 10 metres apart.

The Bull's Head is located within the Goring Hall Conservation Area. A narrow strip of the Conservation Area extends approximately 80 metres further northwards to encompass a section of flint wall which delineates part of the eastern boundary of the Recreation Ground with Goring Street.

Proposal

Permission is sought by the Council's Technical Services Department to replace the existing flag poles with 5 no. new 10 metre high steel posts spanning a distance of 40 metres running parallel to the eastern boundary wall. It is proposed to install a demountable system of mesh netting in-between the posts. The netting will be attached by tracking to the posts. The purpose is to stop balls straying from the Ground during match play thereby preventing damage to parked cars and property.

The new posts will be positioned largely within the same position as the existing flag poles, sited 3.5m from the existing flint boundary wall and inside the existing line of trees. The new posts will be set in concrete 1.5 metres into the ground and will consist of a two part mechanism. The lower part being a 5.5m high 'H' section (up to 4 metres above ground) with the upper part comprising a box section steel support post slotted within the 'H' section to an overall height of 10 metres and fixed in place by 3 no. 'U' bolt clamps.

The proposed nets will consist of polypropylene 50mm mesh mounted onto the posts by a pulley system. Each net will be 5 metres wide and 8.2 metres tall installed at a height of 1.8 metres above ground level. There will be a fixing point on the posts, and a wire at this height to hold the nets in place at 1.8 metres in the lowered position. It is intended that the nets would be at a height that is relatively easy for cricket club members or grounds maintenance staff to access them from a small step ladder. The polypropylene netting is resistant to bacteria, mildew and other micro-organisms, and is not ingested by insects.

Details submitted in support of the application state:-

"The benefit of this system is a stronger more rigid framework to carry the nets. This allows the system to take a greater loading limit allowing the nets to be left in situ for longer periods of time. In simple terms the nets can be left up and in position for wind speeds reaching 40-45 mph. Also there will be less maintenance required from a club perspective in the fact that the nets are only lowered when wind speeds dictate or at the end of the season when you need to take nets down and stored for winter months. By removing the nets at the end of the season this will also help their longevity giving more use over a longer period of time."

It is understood that the current proposal has come about as a result of instances where cricket balls have escaped the Recreation Ground and strayed onto the residential properties on the other side of Goring Street with the associated risk of damage. Although there is an existing system of netting in place, it is understood this has not been effective and consequently a more robust solution has been sought.

Relevant Planning History

There are no planning records relating to the existing flag poles but it is understood they were erected in 2010.

Consultations:

Adur and Worthing Councils: The Council's Tree and Landscape Officer comments:-

"No objection to this proposal and consider that the installation and use of this netting system will not have a detrimental effect on the adjacent trees."

WSCC: The County Ecologist has raised no objection commenting:-

"The net gauge for this type of fencing is typically thick and easily seen/echo located by birds and bats. The nets will run parallel with the tree line rather than across them, so impact is negligible."

Representations: Three letters of representation have been received from residents raising the following points:

- Can you confirm who will be responsible for them being closed when the cricket is not taking place?
- Are you aware the nets are also used as goal posts, climbing frames and hanging clothes, bags on throughout the year, rain or sun?
- It is good to see the nets replaced, but I'm not sure I want some teenager waving at me when he has climbed up the nets. Will there be someone to close up the nets when cricket is not taking place?
- Accidents – who will be accountable?
- Damage to nets – who will be liable – or will residents watch them being damaged over the year?
- High winds – who will take responsibility if they damage our properties on coming loose from the ground due to vandalism or weather etc.?
- As a property owner opposite and in the line of the cricket pitch, I fully support the application.
- However, feel a better design option would be a permanent steel mesh type of safety netting of 30 feet in height, as is found on the north and west boundaries of the recreation ground. This will be more durable and not prone to the inevitable weather and vandalism damage that has occurred to the existing de-mountable type of netting. Its longer lifespan would no doubt make it more economical in the long run. As this type of netting would be permanently up, it would ensure public safety at all times and would not be subject to technical issues and problems in raising a demountable type of net, as cricket is played regardless of whether the safety netting is up or not.
- Are the replacements in the same position or additional ones to extend the length of protection given?
- If replacements, are they the same height?

- Should planning be for replacements, consideration should be given to the height of the netting being extended upwards as the current height has not been adequate in preventing cricket balls hitting my property.

Relevant Planning Policies

Saved Local Plan policies (WBC 2003): H18
Worthing Core Strategy (WBC 2011): Policies 11, 16
National Planning Policy Framework (CLG 2012)
National Planning Practice Guidance

The Committee should consider the planning application in accordance with: 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; and 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.

Planning Assessment

Principle

There is no objection in principle to the proposed development which is consistent with policy 11 of the Core Strategy which seeks to protect and enhance existing indoor and outdoor recreation provision. The proposal has come about as an endeavour to protect existing residential properties while maintaining a well-used recreational facility. The key considerations are the effects of the proposed posts and demountable netting on the residential and visual amenities of the locality, as well on the character and appearance of the nearby Conservation Area, and the setting of the Listed Bull's Head Public House.

Visual Amenity

The proposed posts are 10 metres in height and will be evident in the streetscape, although their visual prominence will be mitigated by the fact that they are positioned close to a line of trees, which are some 8 metres or more in height. It is considered that a colour for the new posts, such as green, will further help the posts assimilate with their surroundings and reduce their visual impact.

The proposed netting will cover some 328sqm in area when in place, which will be a more conspicuous addition to the streetscape. However, the polypropylene netting is available in black, green or white, and it is considered that if the netting were to be green, it would help the netting to visually dissipate (particularly when the trees are in leaf). Bearing in mind the proposal is located within an existing recreation ground where one would expect such items that are linked with sports activities the effects would not be so stridently out-of-place or harmful to visual amenity as to warrant refusal on these grounds.

Residential Amenity

The posts and netting will be positioned approximately 25 metres from the front elevation of the closest properties in Goring Street. Although they will be evidently conspicuous, particularly when the nets are in place, they are considered to be sufficiently well separated distance from these properties so as not to be demonstrably intrusive or overbearing.

Effect on the character and appearance of the Conservation Area and the Setting of the Listed Building

The proposed posts are indicated as being positioned just outside of the strip of Conservation Area which encompasses the adjacent flint wall and some 40 metres from the grounds of the Listed Building to the south. The Council's Conservation Architect has raised no objection to the current proposal and it is considered the posts and demountable netting system are sufficiently well removed as to have no adverse effect on either the setting of the Listed Building or the character or appearance of the Goring Hall Conservation Area.

Other Matters

A number of queries have been raised by third parties in relation to the potential misuse of the posts/nets resulting from anti-social behaviour and possible safety implications. These have been forwarded to the Council's Technical Services Officer to report on any risk assessments that have been undertaken in drawing up these proposals and Committee will be updated of the response at the meeting.

Recommendation

APPROVE subject to Conditions:-

1. Standard 3 year time limit
2. Build in accordance with the approved submitted drawings
3. Agree the colour of the posts and netting

9th March 2016

Local Government Act 1972

Background Papers:

As referred to in individual application reports

Contact Officers:

Peter Devonport
Principal Planning Officer (Development Management)
Portland House
01903-221345
peter.devonport@adur-worthing.gov.uk

Rebekah Smith
Senior Planning Officer (Development Management)
Portland House
01903-221313
rebekah.smith@adur-worthing.gov.uk

Eve Hearsey
Senior Planning Officer (Development Management)
Portland House
01903-221233
eve.hearsey@adur-worthing.gov.uk

Schedule of other matters

1.0 Council Priority

- 1.1 As referred to in individual application reports, the priorities being:-
- to protect front line services
 - to promote a clean, green and sustainable environment
 - to support and improve the local economy
 - to work in partnerships to promote health and wellbeing in our communities
 - to ensure value for money and low Council Tax

2.0 Specific Action Plans

- 2.1 As referred to in individual application reports.

3.0 Sustainability Issues

- 3.1 As referred to in individual application reports.

4.0 Equality Issues

- 4.1 As referred to in individual application reports.

5.0 Community Safety Issues (Section 17)

- 5.1 As referred to in individual application reports.

6.0 Human Rights Issues

- 6.1 Article 8 of the European Convention safeguards respect for family life and home, whilst Article 1 of the First Protocol concerns non-interference with peaceful enjoyment of private property. Both rights are not absolute and interference may be permitted if the need to do so is proportionate, having regard to public interests. The interests of those affected by proposed developments and the relevant considerations which may justify interference with human rights have been considered in the planning assessments contained in individual application reports.

7.0 Reputation

- 7.1 Decisions are required to be made in accordance with the Town & Country Planning Act 1990 and associated legislation and subordinate legislation taking into account Government policy and guidance (and see 6.1 above and 14.1 below).

8.0 Consultations

- 8.1 As referred to in individual application reports, comprising both statutory and non-statutory consultees.

9.0 Risk Assessment

- 9.1 As referred to in individual application reports.

10.0 Health & Safety Issues

10.1 As referred to in individual application reports.

11.0 Procurement Strategy

11.1 Matter considered and no issues identified.

12.0 Partnership Working

12.1 Matter considered and no issues identified.

13.0 Legal

13.1 Powers and duties contained in the Town and Country Planning Act 1990 (as amended) and associated legislation and statutory instruments.

14.0 Financial implications

14.1 Decisions made (or conditions imposed) which cannot be substantiated or which are otherwise unreasonable having regard to valid planning considerations can result in an award of costs against the Council if the applicant is aggrieved and lodges an appeal. Decisions made which fail to take into account relevant planning considerations or which are partly based on irrelevant considerations can be subject to judicial review in the High Court with resultant costs implications.

Motion on Notice - Worthing Borough Council - High Salvington Mill

Joint report by the Director for Communities and Director for the Economy

1.0 Summary

- 1.1 Councillor Tom Wye submitted a Notice of Motion to Worthing Borough Council at its meeting on 23 February 2016. The Motion is attached to this report as Annex A.
- 1.2 The Motion has been proposed and seconded. As it proposes a policy to be incorporated into the emerging Worthing Local Plan, it is before the Planning Committee for consideration.

2.0 Background

- 2.1 The Director for Communities, as Proper Officer, accepted the Notice of Motion and under Council Procedure Rule 14.5, Council accepted his determination that the matter should be considered by this Committee. Therefore the Notice has been proposed and seconded and automatically referred for consideration and determination.
- 2.2 Council Procedure Rule 14.6 allows the mover of the Motion, Councillor Wye, to attend the committee and explain the Motion.
- 2.3 Under Rule 14.6.2 the Member (Councillor Wye) may, prior to any debate on the matter, answer questions from the Committee for the purposes of clarification, and may sit with the committee for the item in question.
- 2.4 Under Rule 14.6.3 the Member (Councillor Wye) may not partake in the debate nor vote upon the item.
- 2.5 The proposal contained in the Motion seeks to instruct Officers to carry out whatever changes to the Worthing Local Plan are necessary to ensure that any future applications to build/re-develop houses/flats or grow additional trees are refused.

3.0 Proposals

- 3.1 The key objective of the Motion is to protect the operational capacity of Salvington windmill. The fundamental issue is therefore to consider how to ensure that sufficient 'wind flow and speed' can reach the windmill so that it can continue to

function as a working mill. In this regard, it should be noted that significant areas around the Mill are already developed and that there are existing mature trees in the vicinity of the Mill. In this regard, the Council is unable to take any retrospective action to help address any of these concerns.

- 3.2 The Motion refers to the Council controlling the planting of trees. In this regard, it should be noted at the outset that the Council is unable to control the planting of trees as this is not defined as 'development' for which planning permission is required. The Council can only manage trees on land within its ownership and encourage local landowners to do the same.
- 3.3 Therefore, the key issue is whether the Council is able to control certain developments within a certain distance and location of the Mill in a way that may provide additional protection for the functioning of the Mill.
- 3.4 Before the report considers the different mechanisms which could potentially be used to address these concerns, it starts by explaining the current position. This includes reference to recent applications and a summary of the levels of protection from inappropriate development that are already in place.

Current Position

- 3.5 As Members will be aware, Permitted Development Rights mean that not all householder development requires planning permission. Therefore, unless an Article 4 Direction is in place (see below) the Council is unable to control all development. Relaxation to the regulations in the last few years have increased the size of extensions that can now be built without planning permission.
- 3.6 Where planning permission is required the Council must take all material considerations into account when determining an application. This is the case for all applications. This includes recent proposals in close proximity to the Mill when all relevant material considerations, including whether there is evidence that a particular development would materially affect the level of wind reaching the Mill, have been taken into account.
- 3.7 As an example, at a recent appeal for the retention of a garage at 1 Furze Road (AWDM/1446/14), an Inspector concluded that the retention of the building would not adversely affect windflow to the mill. The application had been assessed for its potential negative impact to the windflow to the Mill and a representation from a Mill owner received during the determination of the application had also indicated that there would not be any adverse impact. In dismissing the appeal the Inspector made the following conclusion:

'There is considerable apprehension about the potentially detrimental effect that the new development might have on the amount of wind reaching Salvington Mill. The mill is a working mill where flour is ground from time to time and many local residents have expressed concern about jeopardising the ability and frequency of achieving this. However, on the evidence before me I am not convinced that the elements of the development sought, either individually or cumulatively, would materially reduce the wind flows reaching the mill so as to affect its operation. On

the contrary, Building Research Establishment work on wind engineering suggests that it is generally considered that the effect of a building only extends for approximately four times its height. In this instance, given the height of the garage and the distance from the windmill at over about 40m, the indication is that the operation of the windmill would not be affected.'

- 3.8 Another relevant example is an application for extensions and alterations to the roof at 15 Furze Road - AWDM/1342/14 (this was a revision to a previous approval). The issue of windflow to the Mill has been assessed as part of the consideration of each application. A relevant BRE Wind Engineering Assessment (from 1991), together with the assessment provided by an owner of a working mill on behalf of the Society for the Protection of Ancient Buildings (SPAB), concluded that the proposed development would not result in a substantive effect on the windmill. The application was approved.
- 3.9 In addition to the impact tests applied to all development proposals it is important to note that the mill is a Grade II listed building due to its special architectural and historic interest. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local planning authorities must have special regard to the desirability of preserving a listed building and its setting when considering whether to grant planning permission for development. More recently, the NPPF (Para 132) states,
- 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.'*
- 3.10 The Core Strategy and the NPPF therefore provide a robust policy position on heritage which is supported by Historic England practice notes and other guidance. In advance of a Local Plan review in 2015 the Council also published a 'Conservation and Heritage Guide', a simple 'one stop shop' document to provide developers and other interested parties' information on relevant policy and guidance in respect of Conservation and Heritage matters in Worthing. This document would help to inform any proposals that might impact on heritage assets.
- 3.11 Given its heritage designation there is clear and robust guidance at national level that needs to be considered when assessing applications which may affect the setting of listed buildings. As a consequence, the impact on this heritage asset and its setting has been taken into account when planning applications have been submitted for development in the vicinity of the Mill. This has included, in relevant cases, an assessment of the potential impact development could have on reducing 'wind flow and speed' to it.
- 3.12 Therefore, it is clear that the Windmill and its setting is already subject to a high level of protection from development that could impact negatively upon it. Despite this the submission of the Motion demonstrates that there is still concern that further development in the area could impact negatively on the workings of the Mill. This

report now considers mechanisms through which additional protection could be provided, starting with a review of the Local Plan which is the approach advocated within the Motion.

Revisions to a Local Plan

- 3.13 The current Development Plan for the Borough is the Worthing Core Strategy 2011 together with a number of 'saved' Worthing Local Plan 2003 policies. The intention was that the Worthing Core Strategy would help to guide development until 2026. However, it is now being reviewed to reflect latest national policy, particularly with regard to how the Council needs to plan for housing.
- 3.14 The process of adopting or revising a Development plan is not quick or simple. It requires the updating of all relevant evidence, a number of stages of consultation and, ultimately, an examination in public. The timeline for the review of the Core Strategy is set out in the Council's Local Development Scheme (2015) and it is currently estimated that a new Plan will be in place by 2018.
- 3.15 As explained in a separate report to this Committee, the first key stage of consultation (the Issues and Options stage) is expected to be published in the spring. The aim of this consultation is to set out the issues and challenges that will be faced in Worthing over the Plan period and invite comments as to how they can be addressed.
- 3.16 The Local Plan review in consultation with all key stakeholders will develop new policies to address a wide range of issues including the heritage issues of Worthing. Up to date evidence will be used to assess the significance of heritage assets and the contribution they make to the environment.
- 3.17 It is made clear in the consultation documentation that Local Plan policies can be used to help address particular concerns in the local area. Therefore, further to this Motion, there is no reason why representations cannot be submitted during the consultation period that raise concerns about the potential impact of new development on the Mill. As with all issues, Officers will then need to consider whether there is sufficient evidence that would justify the inclusion of a specific policy in the Local Plan. Any policy would need to be supported by robust evidence that would be subject to full consultation as the Plan progresses through its various stages.
- 3.18 Whilst there is nothing to prevent interested parties from proposing such a policy, without clear evidence this route does not offer any certainty. Any policy will be subject to a robust process and scrutiny and is not a short term solution to the issue as the current anticipated adoption of the new Plan is still some time away. It is likely that any draft policy seeking to restrict development within the vicinity of the Mill would be challenged by land owners in the area.
- 3.19 In addition, the planning policy route will essentially guide the determination of those applications that require planning permission and will not cover those that can be pursued through permitted development rights.

Conservation Area Designation

- 3.20 One suggestion is that the Mill and surrounding area could be designated as a Conservation Area to ensure that it is given greater protection from undesirable changes. A Conservation Area can be designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.
- 3.21 In this case it is questionable whether this route would achieve the desired outcomes. As previously stated, as a Grade II listed building, the Mill (and its setting) is already afforded a high level of protection against development that would impact on its heritage status. The designation of exactly the same area as a Conservation Area would not provide any additional level of protection.
- 3.22 Consideration could be given to the designation of a wider area beyond the listed windmill and its setting but there would need to be clear reasons as to why adjoining areas should be included. There is no evidence to suggest that the identification of wider area would meet the assessment criteria that would justify its designation as a Conservation Area. In this respect there are no other buildings of significant architectural merit in the locality of the Mill which would justify a Conservation Area and the need to preserve the setting of the Mill provides the same level of protection in any event.
- 3.23 Furthermore, it should also be noted that even if Conservation Area designation were justified, it would not automatically rule out development. What it would mean is that some developments, that may have been built now as permitted development, would require permission and all developments would be carefully scrutinised to assess their potential impact on heritage assets. This assessment would include consideration of windflow to the Mill, as is the situation at present.

Article 4 Direction

- 3.24 As already explained, certain developments do not require planning permission and can be built as permitted development. An Article 4 Direction is a direction under Article 4 of the General Permitted Development Order which enables the Council to withdraw specified permitted development rights across a defined area. However, to do this there needs to be clear justification for both its purpose and extent and the Council can be liable to pay compensation to those whose permitted development rights have been withdrawn. While Article 4 Directions are confirmed by local planning authorities, the Secretary of State must be notified, and has wide powers to modify or cancel most Article 4 Directions at any point.
- 3.25 It should be noted that the Direction does not in itself prohibit any development but means that a landowner is required to seek planning permission whereas without the Direction this would not be necessary.
- 3.26 It is the view of your Officers that the use of an Article 4 Direction to help address concerns about inappropriate developments around the Mill would not be

appropriate. Firstly, the Council does not currently have robust evidence to demonstrate why such a measure could be justified and secondly it is likely that the type of householder development which currently benefit from permitted development rights would not be of a scale that would have any significant impact of the workings of the Mill.

Options to address concerns of the Trust

- 3.27 The concerns of the High Salvington Windmill Trust are appreciated and it is clear that recent appeal decisions have considered that, in principle, the adverse impact of development on the operation of the windmill could be a material consideration in the determination of planning applications. However, as the previous appeal Inspector has also noted any decision to refuse planning permission or to inform a policy seeking to, for instance, resist development within any particular location around the windmill would have to be informed by clear and robust evidence. Certainly in connection with a recent appeal evidence submitted clearly indicated that any impact would not be material whether individually or cumulatively.
- 3.28 It would be appropriate to seek further guidance on this matter from Historic England, Sussex Mills Group and the SPAB. These bodies would have the necessary experience to understand current risks and advise on whether there would be a need to undertake further studies to assess current windflow and where restrictions to current flow could materially impact on the future operation of the Mill. The Council as landowner could assist with funding further studies if recommended by heritage experts.
- 3.29 If there is clear advice on the need to control certain developments it may be necessary to consider either a policy in the emerging plan or a Supplementary Planning Document (SPD) which seeks to provide guidance to applicants proposing development close to the Mill. Alternatively it may be necessary to amend the current List of Validation requirements to require applicants to submit wind assessment studies to demonstrate no adverse impact on the future operation of the Mill. This latter point may be particularly relevant as it would be difficult to generalise on potential impacts as each case would have to be considered on its individual merits.

5.0 Legal

- 5.1 Worthing Borough Council, as local planning authority, can only control “development” which is defined in Section 55 of the Town and Country Planning Act 1990. “Development” does not include the planting of trees. However, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that all local planning authorities must have special regard to the desirability of preserving a listed building and its setting when considering whether to grant planning permission for development which would affect a listed building or its setting.

6.0 Financial implications

- 6.1 There are no direct financial implications to the Councils of this Notice of Motion. The review of the Core Strategy and the progression of a new Local Plan is being funded through existing budgets.

7.0 Conclusion

- 7.1 Any decision made by the Council to develop a policy or other mechanism which would, in effect, restrict development must be informed by robust evidence. At this stage, Officers do not consider that there is sufficient evidence that would justify any of the measures outlined above. However, given the need to protect this valued heritage asset and the level of concern about the potential impacts of further development (as expressed through this motion) consideration should be given to whether sufficient evidence could be gathered to support any restrictions.
- 7.2 It is considered that the Council should consult with heritage experts to seek further guidance on the current risks to windflow to the Mill and the need for any further technical guidance. If further studies are required the Council as landowner could commission an independent specialist study to determine the effect of any potential future development on the loss of wind power to the Mill. The findings of this study could then inform the most appropriate course of action. A conclusion of this study might be that the Council require developments in certain prescribed areas around the Mill to demonstrate no adverse impact. In this regard, it should also be noted that this study might also conclude that appropriate safeguard measures are already in place and that there is no need or justification for any additional levels of control.
- 7.3 With the aim of protecting this important functioning heritage asset the Council and Mill Trust could take a more proactive approach with neighbouring landowners to explain the need/importance of reducing the height of existing trees and the impact of any additional planting in certain locations. If evidence indicates that existing trees impact significantly on the windflow to the Mill the Council could agree to a more flexible approach to the removal of any trees that are currently covered by a Protection Order. However, in these instances clear justification would need to be provided that the impacts caused by through the loss of a protected tree are outweighed by the benefits to the Mill.

8.0 Recommendation

- 8.1 The Planning Committee is recommended to determine the Notice of Motion as attached to this report at Annex A. It is recommended that,
- i) the Council requests that appropriate Heritage Experts (such as Historic England, Sussex Mills Group and SPAB) be appointed to advise on future risks to the operation of the Mill and whether there is a need for further technical evidence to be prepared;

- ii) if further technical evidence is required then this be sought to inform the most appropriate course of action (likely to be funded by the Borough Council); and
- iii) once appropriate heritage advise is received, this matter should be considered by the Local Plan Working Group as part of the ongoing Local Plan Review.

Local Government Act 1972

Background Papers:

Motion on Notice received by email 1 February 2016

Planning Applications Ref: AWDM/1342/14 and AWDM/1446/14

Contact Officers:

Julia Smith
Democratic Services Manager
Worthing Town Hall,
Chapel Road,
Worthing BN11 1HA
01903 221150
Julia.smith@adur-worthing.gov.uk

Ian Moody
Principal Planning Officer
Worthing Town Hall
Chapel Road
Worthing BN11 1HA
01273 263009
ian.moody@adur-worthing.gov.uk

Schedule of Other Matters

1.0 Council Priority

- 1.1 This report does not link to any Corporate Priority however the Worthing Local Plan is a key document containing a number of policy documents and priorities for Worthing.

2.0 Specific Action Plans

- 2.1 None

3.0 Sustainability Issues

- 3.1 Matter considered.

4.0 Equality Issues

- 4.1 Matter considered

5.0 Community Safety Issues (Section 17)

- 5.1 Matter considered, no issues identified

6.0 Human Rights Issues

- 6.1 Matter considered

7.0 Reputation

- 7.1 Matter considered, no specific issues identified.

8.0 Consultations

- 8.1 No specific consultations were undertaken

9.0 Risk Assessment

- 9.1 There is a risk that a piecemeal approach to amending the local plan without due consideration of the consequences and with suitable evidence that any Inspector would dismiss policies contained in it.

10.0 Health & Safety Issues

- 10.1 Matter considered, no issues identified.

11.0 Procurement Strategy

- 11.1 Matter considered, no issues identified

12.0 Partnership Working

- 12.1 Matter considered.

Notice of Motion - High Salvington Mill

There has been a windmill on the Furze Road site since at least 1615; the current mill has been on the site since the 1700's. That the mill is now a fully operating windmill is because thousands of man hours have been committed by volunteers in not only restoring it to its former glory but ensuring the work carried out was to the highest possible standard, thus ensuring the mills availability for future generations. While carrying out this work they have also managed to save sufficient funds to ensure that they would be able to positively react to a major incident.

All of this work is now under considerable threat as over the years development of houses and the growing of trees has resulted in only two areas from which the wind can blow when it would be possible to operate the mill and grind corn. That is in small areas of the south west and north east. If any development was permitted in these areas the mill would be unable to operate.

Senior officers of the Council have visited the mill and have agreed that it is worth preserving and it is thought that this sentiment is also that of the Councillors.

This Council moves that the officers be instructed to carry out whatever changes to the Worthing Local Plan are necessary to ensure that any future applications to build/re-develop houses/ flats or grow additional trees are refused.

The Grand old Lady of Worthing, the Salvington Mill, deserves your protection as do the volunteers who have put their hearts and souls into preserving her.

Proposed by; Cllr Tom Wye MBE

Seconded by; Cllr Vino Vinojan

Worthing Local Plan – Issues and Options Consultation

Report by the Director for the Economy

1.0 Summary

- 1.1 A full review of the Core Strategy (to be replaced by a new Local Plan) is required to respond to significant changes to the planning system at the national level, particularly how local planning authorities need to plan for housing.
- 1.2 The work programme to progress a new Local Plan, set out in a revised Local Development Scheme, was published by the Council in March 2015. Since that time key elements of the evidence base have been updated and the Council is now in a position to publish the Issues and Options consultation document titled 'Your Town–Your Future'. This is the first stage of wider consultation which will help to influence how the town will grow and develop in the period up to 2033.
- 1.3 The committee is asked to comment on the content of the draft document prior to being approved for consultation by the Executive Member for Regeneration.

2.0 Background

- 2.1 The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development in the Borough until 2026. However, it must now be reviewed to reflect latest national policy, particularly with regard to how Council's now need to plan for housing. Whilst much of the work in the Core Strategy is still relevant the new Plan, to be called a Local Plan rather than a Core Strategy, now needs to look ahead to 2033 and work out the best places for new housing and other growth to go. It is a statutory requirement for Council's to have an up-to-date Development Plan in place.
- 2.2 The new Local Plan will need to balance the benefits of 'growth' against the potential impact of future development and the need to protect the environment. To do this it will need to:
 - Aim to meet the objectively assessed development and infrastructure needs
 - Identify land where development would be inappropriate
 - Contain a clear strategy for enhancing the natural, built and historic environment

- 2.3 The Council approved a revised Local Development Scheme (LDS) in March 2015 which set out a commitment to review the Core Strategy and get a new Local Plan in place by 2018.
- 2.4 To ensure that the Local Plan is found sound when scrutinised at Examination it must conform to the national / regional context and be based on the latest evidence. Since the Council committed to review the Core Strategy work has focussed on updating key parts of the evidence base.
- 2.5 A Worthing Housing Study was published in June 2015 which provides an assessment of the objectively assessed housing needs (OAN) in the Borough. In addition, an Employment Land Review and a Landscape & Ecology Study are nearing completion and these will be published at the same time the Issues and Options consultation commences.
- 2.6 The Council is required to consult widely on the emerging Local Plan at a number of stages as it is being prepared. For the Worthing Local Plan the first main step in this process is the Issues and Options stage.

3.0 Proposals

- 3.1 The draft Issues and Options consultation document, titled 'Your Town—Your Future' is attached to this report as Appendix A. The purpose of this consultation is to invite comments from interested parties on all relevant topics to help identify the issues that the Council should address in the new Plan. Receiving comments at this stage will help to ensure that the Plan sets off in the right direction and covers the things it needs to cover. It will also help to inform what further evidence is necessary beyond that we have already collected or plan to collect. It is important to note that the Council is not, at this stage, proposing any policies or stating which sites should be allocated for development in the new Plan.
- 3.2 Using evidence and the outcomes from the first Local Plan Member workshop (September 2015) the draft document identifies the key challenges that will be faced over the Plan period and then proposes a Vision and a set of Strategic Objectives that will help to address these. The Vision and Objectives form a critical starting point for the new Local Plan and comments are invited on these overarching aims.
- 3.3 Whilst comments are invited on all aspects of the new Plan, the draft document helps to steer the debate by setting out some key questions as to how these challenges may be best addressed. The responses received on these issues will help to influence the subsequent drafting of the Plan.
- 3.4 Informed by the Council's emerging evidence base the draft document identifies the following key issues:
- Economy
 - Retail and Town Centre
 - Tourism
 - Community and Leisure Facilities
 - Transport

- Environment
- Housing
- Planning Policies (this covers all other areas of the Plan)

- 3.5 In addition, the document explains the very high levels of development needs in the Borough and the reasons why all possible opportunities to deliver this need will need to be considered as the new Local Plan is progressed. This part of the document is split into two sections: development options within the town; and edge of town development opportunities.
- 3.6 The section of the document that summarises the development options within the town includes a list of ten key sites where development is expected and supported over the Plan period. These opportunities will help to deliver regeneration and meet wider objectives. The sites are identified as 'Areas of Change', eight of which are already included in the Core Strategy. The two new sites identified are Centenary House and the HMRC Offices adjacent to Durrington Station.
- 3.7 The edge of town opportunities section includes a summary of the greenfield sites around the town that are being assessed to see whether they have any potential to deliver new development. It is important to note that the inclusion of a site in this list in no way indicates the Council's intention to allocate or support development. However, the Council must test all potential opportunities to meet identified needs. It will be evidence, which can include consultation responses, that will be used to help determine which (if any) of these sites should be put forward for development in the draft Local Plan to be prepared in the coming months. The Landscape & Ecology study referred to in the draft consultation document is one key piece of evidence when considering these sites but it should be noted that the findings from this study will need to be balanced with other evidence.
- 3.8 All Worthing Members were invited to the second Local Plan workshop on February 4th 2016. The workshop included a presentation of the Landscape and Ecology Study and consideration of the draft Issues and Options consultation document (which was circulated to all Members in advance of the workshop). A summary report of the workshop has since been circulated and this explains that Members in attendance were broadly supportive of the approach proposed.
- 3.9 Members that attended the workshop made a number of comments in relation to consultation methods. It was suggested that a wide range of methods (e.g. social media, local press etc) could be used alongside the more 'traditional methods' to ensure that the consultation reached the widest possible audience. Officers in the Planning Policy team are currently working on a consultation strategy with the Council's Communications team and this will be considered by the Local Plan Working Group prior to the consultation commencing.
- 3.10 Subject to the consideration of Planning Committee, the Executive Member for Regeneration will be asked to approve the document for consultation over a six week period. In this regard, the May 5th local elections are of some relevance and the exact timing of the consultation has yet to be set. Whilst the consultation document is not setting or proposing Council policy, Members may feel it is

preferable to delay the consultation slightly until after the election date rather than run the Issues and Options consultation over the election period.

4.0 Legal

4.1 The Worthing Local Plan will be prepared in accordance with the Planning and Compulsory Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Localism Act 2011.

5.0 Financial implications

5.1 There will be some printing and advertising costs associated with the first stage of consultation on the new Local Plan. These will not be significant and will be funded through existing budgets.

5.2 However, there are some further, and more significant, costs attached to the progression of a new Local Plan. Most of these costs relate to the evidence base required to make informed decisions within the Plan but there are also cost associated with the Examination. The production of the Local Plan, as timetabled in the Local Development Scheme, is to be funded by the existing service budget.

6.0 Recommendation

6.1 Planning Committee is recommended to:

Consider the officer's report and the attached Issues and Options consultation document and decide what comments, if any, it wishes to pass on to the Executive Member for Regeneration prior to the approval of the document for consultation.

Local Government Act 1972

Background Papers:

- Draft Issues & Options Consultation Document (Appendix A)
- Local Development Scheme 2015
- Worthing Core Strategy 2011

Contact Officer:

Ian Moody, Principal Planning Officer, Planning Policy Team (Portland House)

Contact No: 01273 263009

Email: ian.moody@adur-worthing.gov.uk

Schedule of Other Matters

1.0 Council Priority

- 1.1 This report does not link to any Corporate Priority however the Local Plan is a key document that, when adopted, will support many council priorities. It will:
- support major regeneration projects to tackle deprivation;
 - support businesses in creating jobs and regenerating neighbourhoods;
 - seek to meet the housing needs of our communities;
 - work with partners to reduce deprivation and inequalities.

2.0 Specific Action Plans

- 2.1 The timetable for the progression of a new Local Plan is set out in the Council's Local Development Scheme (2015)

3.0 Sustainability Issues

- 3.1 The Government requires that all Development Plan Documents (including Local Plans) be subject to a formal sustainability appraisal. The Local Plan will aim to promote sustainable development.

4.0 Equality Issues

- 4.1 The Plan will be the subject of an Equalities Impact Assessment. It will aim to ensure that all groups in Worthing have equal access to the spatial opportunities offered by the new Development Plan. For example, the provision of affordable housing and sustainable transport initiatives are key issues to be addressed through the new plan to help promote equal opportunities.

5.0 Community Safety Issues (Section 17)

- 5.1 The new Local Plan will consider community safety issues.

6.0 Human Rights Issues

- 6.1 Matter considered – no specific issues identified.

7.0 Reputation

- 7.1 The delivery of a new Local Plan will meet the spatial needs of the Borough and therefore have a positive impact on the reputation of the Council.

8.0 Consultations

- 8.1 Formal and informal stages of consultation with the public and all relevant stakeholders are integral to the development of a new Local Plan. As a minimum, consultation will be undertaken in line with the Joint Adur and Worthing Statement of Community Involvement (Dec 2012).

8.2 Members of the Council (particularly the Local Plan Member Working Group) will be involved in the progression of the new Local Plan at all appropriate stages.

9.0 Risk Assessment

9.1 There is a statutory duty on the Council to produce an up-to-date Development Plan. Failure to meet the milestones as set out in the Council's Local Development Scheme could impact on a number of this Council's priorities including economic and social regeneration as well as the delivery of affordable housing.

9.2 Failure to get a new Development Plan in place in a timely manner may impact on local control when determining applications and increase the risk of speculative development proposals.

10.0 Health & Safety Issues

10.1 Matter considered and no issues identified.

11.0 Procurement Strategy

11.1 Matter considered and no issues identified

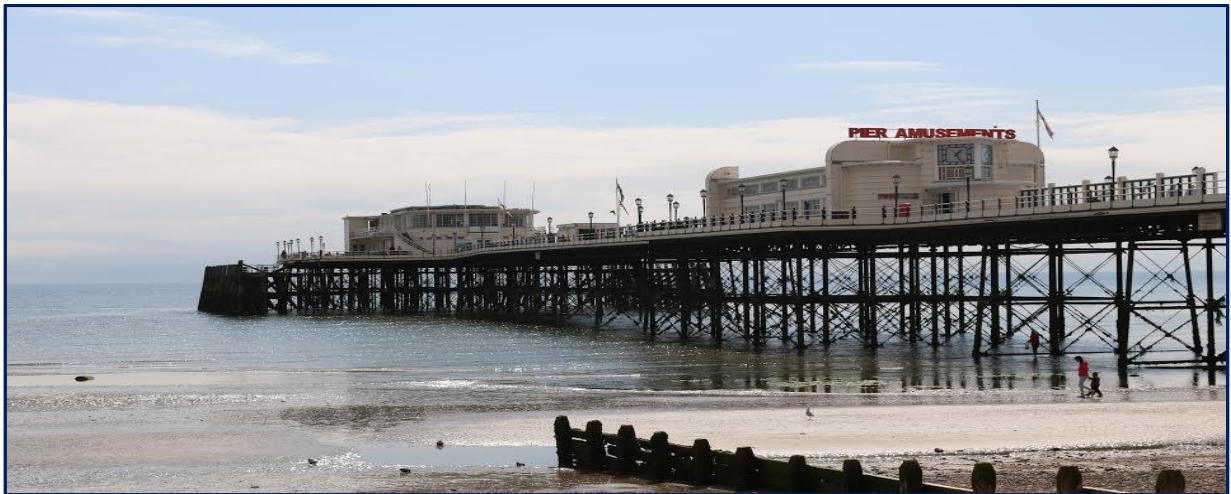
12.0 Partnership Working

12.1 The Government's Duty to Co-operate places a requirement on Local Planning Authorities to work with neighbouring authorities to address strategic issues. Work to address this need is on-going and will continue as the Plan is advanced.

12.2 Given that the Local Plan for Adur District Council is well advanced, officers will consider best practice and elements/policies in that Plan that will also be relevant to the new Worthing Local Plan. Where appropriate, evidence studies will be procured jointly with Adur DC and other neighbouring planning authorities.

Worthing Local Plan 2013 – 2033

Your Town - Your Future



**Draft for Consideration at Planning Committee
9th March 2016**

Format

	Page
● Foreword by Executive Member for Regeneration	2
● Introduction	3
○ Have your say on development in Worthing	3
○ What is this consultation about?	3
○ What comments are we seeking?	4
○ Why do we need a new Local Plan?	4
○ What will the new Plan need to do?	5
○ Where will it cover?	5
○ How does the Local Plan relate to other plans and strategies?	5
○ Format of this document	6
● Our Borough Now	7
○ Overview	7
○ Key facts	8
○ Key challenges	9
● Vision and Objectives	10
○ Vision	10
○ Strategic Objectives	11
● Key Issues	13
○ Economy	13
○ Retail and the Town Centre	15
○ Tourism	16
○ Community and Leisure Facilities	17
○ Transport	18
○ Environment	19
○ Housing	21
○ Development options within the town	24
○ Edge of town development opportunities	28
○ Planning policies	33
● Contact / How to get involved	35
● What happens next?	36

Foreword - By Executive Member for Regeneration

This consultation is the first step in creating a new Local Plan for Worthing. The Plan, that looks ahead to the year 2033, will be a key document in shaping the future of our borough and will affect us all. I am therefore keen to encourage as many people as possible to get involved.

You may be wondering why we are preparing a new Plan when we've only recently prepared a long term plan to 2026. The current Local Plan, called the Worthing Core Strategy, adopted in 2011 has put us in a strong position - it has helped to steer new building to the places we've planned it and to stop inappropriate development. However, since its adoption central government has changed the planning system which has had many implications for local authorities, particularly in how housing needs are addressed and cross boundary matters are considered.

In response to the new requirements, and to ensure that the Council remains in control of our own Plan, we are committed to getting a new Plan in place as quickly as possible, whilst at the same time allowing for sufficient time for evidence to be updated and for appropriate stages of consultation and engagement.

The Council will continue to plan positively for regeneration and growth and in doing so some difficult decisions will need to be made. Given the limited amount of available land in the Borough and significant environmental constraints it will be vital that the right balance is struck between new development and the need to protect the character and setting of Worthing which we value so greatly.

It is an important time to get involved and tell us what you think. No decisions have been made, this is the first stage in shaping our new Plan. Using evidence, we have identified what we believe to be the key social, environmental and economic issues and opportunities facing the Borough and highlighted these in this document.

Please respond to this consultation – and encourage others to do so too – your responses will be considered and will help us to develop preferred policy options in a draft plan. Your involvement will ensure that we can face the challenges and build on recent successes to make the Borough even better in 2033 than it is now.



CLLR BRYAN TURNER

Introduction

The Council has started work on preparing its new development plan, called the Worthing Local Plan, which will have a big influence on the Borough in the period up to 2033. This consultation provides an opportunity for people to help shape the future of the Borough to meet their needs to create a better place to live, work and play.

The new Plan will provide the strategy for the growth of the Borough, setting out what development will take place and where. It will set out a vision for the area that helps to establish the long term aims and aspirations. The vision will be turned into objectives and policies which will deal with issues such as housing, the economy, the environment and infrastructure. Once adopted, the new Plan will replace the Borough's existing local planning policies and will be an important consideration in deciding planning applications.

Have your say on development in Worthing

This consultation is the first stage in preparing the Plan. Plans can only be truly successful if they are rooted in local knowledge and have an appreciation of what residents want. Too much change, change that is too fast, or not listening to people's views will not deliver a good Plan. Similarly, planning too little development is not an option either, as the plan needs to support growth. Ultimately the Plan will go through independent examination by a planning inspector to make sure it is based on robust evidence and seeks to meet development needs. Not everyone will necessarily get the outcome they want, but making sure your ideas or concerns are understood and considered will help to make the Plan better. This is the first of several chances to have your say.

What is this consultation about?

We are seeking your views and suggestions on how Worthing should grow and develop in the future. This consultation identifies the issues and challenges facing the borough and the options that could help address them. Unlike many other local authority areas spread over wide areas there are only a limited number of development options in and around the town. We are therefore asking your views on how best to balance the delivery of growth and regeneration across the borough to meet future needs whilst at the same time protecting the things we value about the town.

The Council is not, at this stage, stating which sites it will be looking to allocate for development in the new Plan. However, with reference to key evidence, the Council is inviting views on key issues, options and opportunities. The comments that we receive will be given consideration when decisions are made on which sites will be proposed for allocation.

Although the Local Plan will reflect local issues and choices it should be noted that there are also some important limitations as, in line with national policy (particularly the National Planning Policy Framework), the Local Plan must:

- take account of national planning policies and their support for sustainable development;
- be based on an objective assessment of the borough's development needs;
- have regard to the various other strategies of the Council and its partners;
- take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage;
- be supported by a Sustainability Appraisal. This is a legal requirement and is used at different stages to assess the impacts of the Plan.

What comments are we seeking?

The purpose of this consultation is to identify the issues that we should address in the new Plan. Receiving comments at this stage will help us to ensure the Plan sets off in the right direction and covers the things it should cover. It will also help to inform what further evidence is necessary beyond that we have already collected or plan to collect.

To do this, the document identifies a number of issues and asks questions in relation to these issues and associated evidence. There is no requirement for you to comment on every element or to answer every question; we would like you to provide comments on any areas that you have an interest in. Please note it is important to comment on things that you may agree with as well as those you disagree with. It would be helpful if you could ensure that you give an explanation or justification for any comments you make.

Why do we need a new Local Plan?

The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development until 2026. However, it must now be reviewed to reflect latest national policy, particularly with regard to how we now need to plan for housing. Whilst much of the work in the Core Strategy is still relevant the new Plan, to be called a Local Plan rather than a Core Strategy, now needs to look ahead to 2033 and work out the best places for new housing and other growth to go. The Plan must be based on the latest evidence and the national / regional context.

It is a statutory requirement for Council's to have an up-to-date Development Plan in place. Furthermore, without a new Local Plan there is a risk that the Council would lose a degree of local control of planning matters as the likelihood of speculative development proposals would increase.

What will the Local Plan need to do?

In simple terms the new Local Plan needs to balance the benefits of 'growth' against the potential impact of future development and the need to protect the environment. To do this it will need to:

- Aim to meet the objectively assessed development and infrastructure needs
- Identify land where development would be inappropriate
- Contain a clear strategy for enhancing the natural, built and historic environment

The Plan will cover many land uses like homes, businesses, retail, transport, community facilities and green infrastructure. It will contain a Vision for the Borough and a set of associated economic, community and environmental objectives. The Plan will also include new land use allocations where they are needed and policies which will be used to assess planning proposals.

Where will it cover?

The new Local Plan will cover most of Worthing Borough. However, unlike the existing Core Strategy, it will not cover the land in the north of the Borough that lies within the South Downs National Park. The National Park Authority is a planning authority in their own right and they are producing their own Local Plan which will set planning policy for all areas within the South Downs National Park boundary.

In line with the requirements of the duty to co-operate Worthing Borough Council will work with partners and local authorities to consider a range of cross boundary issues.

How does the Local Plan relate to other plans and strategies?

The Worthing Local Plan has to reflect and put into practice a large number of national, regional and local strategies, plans and guidance. At the national level the Local Plan must be in conformity with the National Planning Policy Framework (NPPF) which sets out the government's priorities for planning in England.

Some of the policies in the Local Plan will rely on actions by other parties, so it is important that they are engaged in the process early and agreement reached on who does what. Worthing Borough Council is therefore liaising with relevant bodies that prepare strategies affecting the Borough's future, including health, transport, housing, employment and the environment. This is to ensure that plans and policies are as closely aligned as possible and that strategies support each other.

The Local Plan will also be supportive of the Council's current and emerging priorities and strategies set out in related documents.

Format of this document

The Council has already started collecting and producing the evidence that will inform the preparation of the Local Plan and some of the key issues and challenges identified are highlighted in this document. Whilst comments are invited on all aspects of the new Plan, this document helps to steer the debate by setting out some key questions as to how these challenges may be best addressed. The responses received on these issues will help to influence the subsequent drafting of the Plan.

All engagement and how it has influenced the Plan at each stage will be recorded in the Worthing Local Plan Consultation and Engagement Statement.

DRAFT

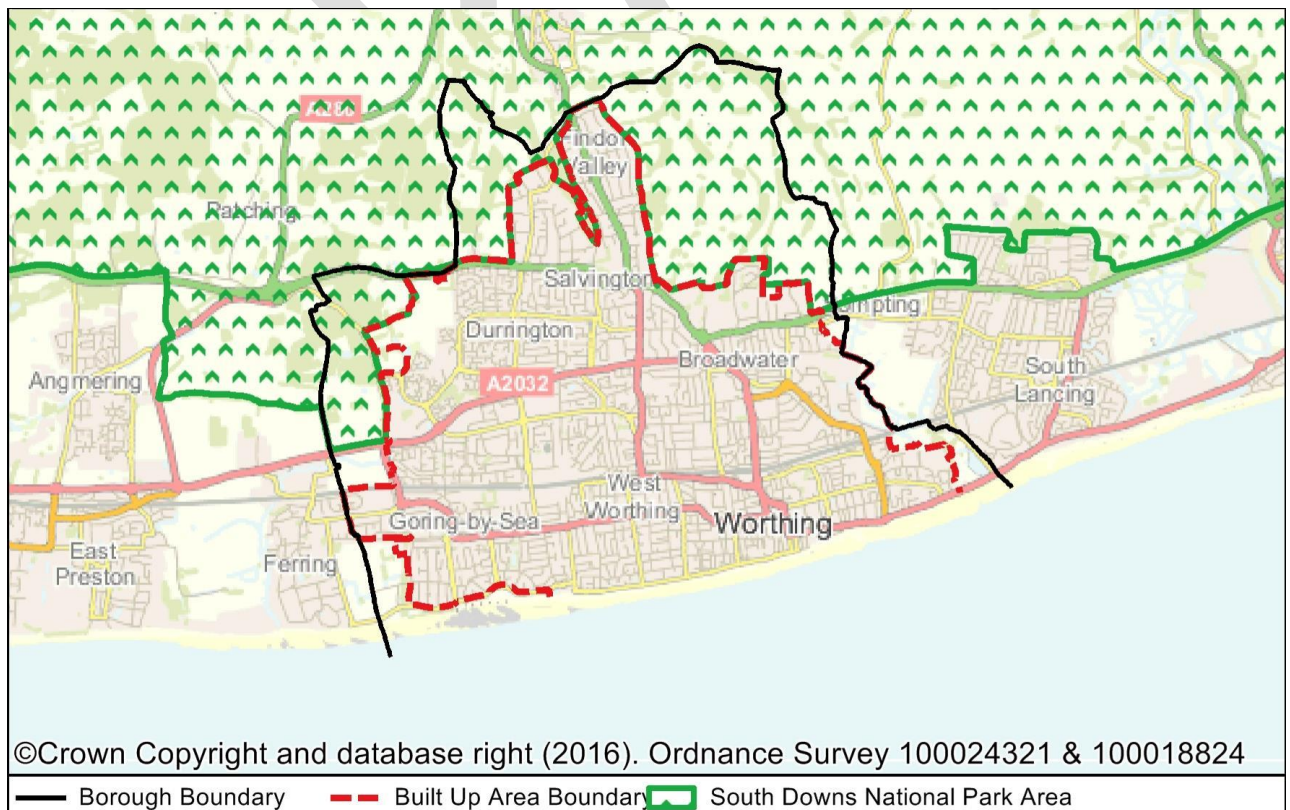
Our Borough Now

Overview

The starting point for developing a vision for Worthing is to understand where we are now and how its assets and positive attributes can be used to address the key challenges that are expected to arise over the next 15 years and beyond. Some key facts about the borough and a summary of the challenges that now need to be faced are set out below.

The town, originally developed as a popular Victorian and Edwardian seaside resort, located between the English Channel and the South Downs. It is now one of the largest towns in West Sussex, with around 105,000 residents and a workplace population of approximately 49,000 people. Worthing plays an important role within a wider sub-region with key links to other authority areas such as Brighton & Hove, Adur, Arun, Horsham and Crawley for housing and employment.

Worthing has much to offer its residents, working people and visitors. In recent years the town has seen a resurgence in popularity as young people and families are attracted by the coastal lifestyle. There are a number of greenspaces, parks and gardens within and around the town which are highly valued by residents and visitors. In addition, significant enhancements have been made to the seafront which continues to be an important asset for the town. This is having a positive effect on local businesses and a range of new independent shops and eateries have opened within the town centre.



Key Facts

Community			
Worthing's population has grown 8.6% since 2001	Population growth is largely driven by domestic migration	Most people move to Worthing from Adur or Brighton	25% of the population are aged 65 or over
Number of 1 person households increased 26% from 2001-2011	Average house prices are 7.8 times average earnings	A number of wards ranked in the top 20% most deprived	3% households are living in unsuitable accommodation
In 2014 there were 821 households on the Housing Register	From 2006 - 2015 a total of 2,310 new homes were built	Life expectancy is 7-8 years lower in the most deprived wards	In 2012, 21.1% of adults were classified as obese

Economy			
43% of office space is located in the town centre	72% of the population is economically active	43% of residents commute out of the Borough for work	The visitor economy is worth £170,000,000 a year
Resident wages are higher than Arun and Adur	62% of employment floorspace is industrial	Number of jobs has increased 9.7% from 1997-2015	14% of the working population are self employed
Most jobs are in healthcare, business services, and retail	31.7% of residents have NVQ4 and above qualifications.	Significant job losses in finance and manufacturing	Employment Land Review published XX 2016 (TBC)

Environment			
4 sites of Nature Conservation Interest	360 Listed Buildings	26 Conservation Areas	10,400 properties are at risk of flooding
Bordered by South Downs National Park (SDNP) to the north	Only 8% of land is outside SDNP and Built Up Area	Air Quality Management Area in place	Parts of the Teville Stream are culverted and poor quality.
Bathing water is classed as excellent quality	Worthing is in an area of serious water stress	Worthing includes stretches of undeveloped coastline	(TBC) Worthing Landscape Study published XX 2016

Key Challenges

Although Worthing has seen some key successes in recent years there is still much work to do to ensure that the borough continues to prosper, meets the needs of its residents and better fulfils its role within the wider sub-region.

Whilst there is an aspiration to deliver growth this must be achieved within a very constrained borough. Limited land availability and sensitive areas of countryside around the borough means that there is little room for expansion. The overarching challenge will therefore be the need to balance development and regeneration requirements against the limited physical capacity of Worthing.

A related challenge will be to ensure that development that does come forward delivers the most appropriate mix of uses that responds to existing and future needs. Housing sites will be required to meet a significant demand and the type of housing delivered will need to respond to the demographic changes being experienced. Whilst the need to deliver housing will be a dominant theme other needs such as employment, leisure and community facilities will also need to be carefully considered and balanced as the Local Plan is progressed.

Other key challenges that will run through the Plan will be the need to: help facilitate regeneration; unlock development sites; safeguard key employment land; ensure infrastructure is delivered to support growth; and reduce disparities between the most and least deprived parts of Worthing.

Although the Council will work positively to deliver growth there is no expectation that all needs will be met within, what is, a very constrained Borough. Therefore, it will be imperative that the Council continues to work with neighbouring authorities and partners under the Duty to Co-operate to see whether there is any ability for other areas to deliver some of Worthing's needs.

The vision and objectives that follow are designed to tackle these key challenges. This document then addresses different themes such as the economy, retail and housing. It is accepted that many of the issues identified are interrelated but for the purpose of this consultation they have been drafted in this way to allow for comments to be made on different topics areas.

Vision and Objectives

Vision

The vision will form the critical starting point for the new Local Plan. As such, it is vital that it encompasses the aims and aspirations for the Borough looking to 2033, whilst also ensuring that it is achievable. To help achieve the vision, a series of strategic objectives have been drafted which are also set out below.

The draft vision, and objectives of the Worthing Local Plan have been informed by the existing Core Strategy, the views of elected Members and existing / emerging evidence from various studies and high-level strategies. We are now seeking your views to ensure we are heading in the right direction and the Vision will be refined as options are developed. When finalised, this will become the cornerstone against which the rest of the Local Plan will be prepared.

VISION
<p>By 2033 Worthing will be recognised as a highly desirable place to live, work and visit, continuing to attract high calibre businesses and significant inward investment that will help the town's economy to grow and improve its regional competitiveness. Regeneration of the town centre and seafront will have built on recent successes to deliver a vibrant and diverse retail, cultural and leisure offer for residents and visitors of all ages.</p> <p>Limited land resources will have been developed in the most efficient way to maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the Borough's intrinsic character and its beach and countryside setting have been protected and enhanced. High quality new development will have been integrated with existing communities and opportunities taken to deliver new and improved facilities and services.</p>

Q1: Vision

- a) Do you agree with the Vision we are aiming and aspiring to achieve?
- b) Does it provide a clear direction to the Worthing Local Plan?
- c) Is there anything you think we have missed which you would like to see incorporated in the Vision?

Strategic Objectives

COMMUNITY

The Local Plan will:

- Deliver a range of high quality new homes that best reflect the identified needs within the Borough (in terms of size, type and tenure)
- Ensure that developments provide an appropriate level of affordable housing to help those in housing need
- Improve accessibility to services, local centres and the town by sustainable modes of transport, reducing the need to travel by car
- Ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from new development
- Safeguard family homes and the character and amenity of residential areas
- Ensure new development integrates into existing communities, supporting local centres to enhance well-being of all people, and reduce inequalities

ECONOMY

The Local Plan will:

- Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses
- Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre
- Encourage family friendly and evening economies and improve the retail, cultural and leisure offer in the town centre through the improvement of existing areas, the delivery of new developments and improved connectivity
- Enhance the gateway approaches and key transport corridors leading into the town centre
- Support Worthing's tourism role through the provision of additional high quality tourism facilities
- Deliver high quality public realm and enhanced infrastructure to attract inward investment
- Seek to improve the skills of the workforce and quality of the environment to encourage the creation of high value jobs by existing and new businesses

ENVIRONMENT

The Local Plan will:

- Protect, and where possible enhance, valued green spaces, stretches of undeveloped coastline and the quality of the natural environment
- Improve the quality of the natural environment and public realm within the town centre and along the seafront
- Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs
- Protect, maintain and enhance the distinct character, heritage, identity and setting of the Borough
- Ensure development mitigates the impact of, and helps the Borough to adapt to, the effects of climate change, now and in the future
- Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel

Q2: Strategic Objectives

- a) Do you agree with the proposed objectives set out above? If not, what changes would you like to see?
- b) Are the objectives sufficiently distinctive and locally specific?

Key Issues

Economy

A key role of the new Local Plan is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

Existing employment land faces continuing pressure from other uses and particularly from higher value like housing. This pressure has been exacerbated by the Government policy to allow some commercial buildings to be converted to new homes.

The Council has started to update key components of its evidence base and an Employment Land Review was published in (TBC). This work has focused on the more traditional employment uses (B class uses¹), however, it does consider, to some extent, the needs of other employment generating uses.

What we know:

Worthing supports a significant amount of employment activity, cultural amenities, educational institutions, retail outlets and visitor attractions. Whilst the focus is on small and medium size businesses there are some large international companies located within the Borough and strong sectors such as health and pharmaceuticals.

Worthing is a net exporter of labour as a proportion of working age residents look outside of the borough for work. The local economy has a significant focus on lower value employment sectors including an above average representation in retail and the public sector. Skills levels are lower than the surrounding authorities and workplace wages are also significantly lower than resident wages suggesting the types of employment roles available locally are less well paid than elsewhere in the sub-region.

Generally, the range of employment sites in Worthing comprises good quality, well maintained stock with low vacancy levels, which demonstrates that much of the existing floorspace is meeting a local market need. The total amount of B class floorspace has been declining with office space decreasing at a greater rate than industrial space.

Levels of new development have been limited over recent years resulting in a growing amount of outdated stock. Demand for office space is expected to grow with a focus on local business needs for small scale, high quality office space in accessible locations. There is a severe shortage of, and strong local demand for, industrial units. Demand for both office and industrial floorspace is mainly from the local market.

¹ B1 Business: offices, research & development, and light industrial; • B2 General Industrial: and
• B8 Storage and Distribution: warehouses, wholesale centres, and distribution centres.

In terms of employment growth the highest growing sectors and key growth drivers over the Plan period are expected to be health, care & social work and professional services. Other growing sectors will be accommodation & food services, pharmaceuticals, transport, storage & distribution and education.

What the Local Plan must do:

- Set out a clear economic vision and strategy which positively and proactively encourage sustainable economic growth.
- Avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of it being used for that purpose.
- Plan for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs.
- Support existing business sectors and, where possible, identify and plan for new or emerging sectors to encourage inward investment.
- Include policies that are flexible enough to respond to change.

Key Challenges

- Aim to meet Worthing's employment floorspace needs so that the Borough's economy is not constrained, recognising that developments in adjoining areas will also be a key influence.
- Planning for employment will need to be balanced against pressures from other land uses such as housing, retail and leisure.
- Seek to provide a choice of sites and locations to meet the needs of particular sector and occupier needs.
- Help to improve qualification and skills attainment to better meet the demands of local businesses.

Q3. Economy

- (a) Do you agree with the key challenges identified for the Economy? Are any missing?
- (b) Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
- (c) In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

Retail and the Town Centre

What we know

Worthing town centre is the main destination for shopping, leisure and entertainment. Like many towns, Worthing suffered during the economic downturn. However, it did better than most with relatively low levels of vacancy. Despite this, improvements are required to ensure Worthing better fulfils its role within the sub-region.

Town centres are changing - people are using them in different ways, more for leisure and less for day-to-day shopping. The flexibility provided through the rise in online shopping means that retailers can still reach a large proportion of shoppers with fewer stores. The town needs to respond to these changes to remain exciting, relevant and used. It needs to build on its success whilst continuing to adapt and react to change, whilst protecting its valued character.

Worthing has a reasonably successful and resilient hierarchy of retail centres ranging from local parades to the main town centre. These centres are fulfilling their role within the hierarchy and have expanded their range of services and facilities to better meet local needs.

What the Local Plan must do

- Ensure that town centres remain vibrant, diverse and healthy, performing at the heart of communities.
- Reassess the network of centres within the local and sub regional hierarchy.
- Define the extent and role of town centres and primary shopping areas.
- Allocate a range of suitable sites to meet the needs for all town centre uses.
- Promote a competitive, attractive and diverse town centre that provides customer choice and a diverse retail offer and which reflect the individuality of the town.

Key Challenges

- Ensure retail centres meet current and future needs.
- Deliver development at the right time, of the right size and in the right location.
- Create diverse and vital hierarchy of centres to meet changing needs.
- Provide development in the town centre to meet a range of complementary needs.

Q4. Retail and the Town Centre

- a) Have all the key challenges for retail areas and the town centre been identified, if not what has been missed?
- b) Are retail centres functioning well - how can they be improved?
- c) How could new development in the town centre enhance the town's identity and attract more visitors?

Tourism

What we know

The town centre and seafront area is the main focus for tourism in the borough and it is important that the area adapts to meet changing needs. The town needs to provide an attractive cultural and entertainment offer, enhance the night time economy, provide activities for families and ensure that there is a range of visitor accommodation. In essence, the town centre must be a place where more people want to visit and stay for longer. It is also important to build stronger links with the tourism offer outside of the town centre including leisure opportunities along the coast and links to the South Downs National Park.

What the Local Plan must do

- Articulate a vision for tourism.
- Allocate a range of sites to meet the scale and type of tourism and cultural development needed.
- Improve links to the South Downs National Park whilst respecting the character of the countryside.

Key Challenges

- Promoting opportunities for leisure and cultural activities to add vibrancy.
- Build high quality development and public space which enhances the town's identity and historic environment to attract more visitors and businesses.
- Ensure the right mixes of uses are encouraged.

Q5. Tourism

- a) Have the key challenges for tourism been addressed?
- b) In what ways can the tourism offer be improved?

Community and Leisure Facilities

What we know:

Community and leisure facilities are vital to supporting health and wellbeing. The Local Plan has a key role in making sure these facilities are provided and, where appropriate, protected. This is important not only for the quality of life for residents in new developments, but also the quality of life for the existing population. Infrastructure should be designed and provided to meet the needs of people at all stages of their lives, to help bind communities together and help them to lead healthy active lives. This has particular relevance for Worthing with its ageing population and recent influx of young families.

In 2014 an Open Space and Recreation Study showed that areas of open space including the seafront and civic space (non-green) and nature areas are well used by local residents and valued for exercise and social interaction. The Borough also has a wide range of sports facilities. Splashpoint Leisure Centre was opened in 2013 as a new flagship venue, however some other public sport and leisure centres are ageing.

The Worthing Infrastructure Delivery Plan is being updated to identify key items of infrastructure required over the Local Plan period. This will cover a wide range of social infrastructure including health and social care, education, community, housing, sport, faith and culture; in addition to physical and green infrastructure.

What must the Local Plan do:

- Plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities.
- Guard against the unnecessary loss of valued facilities and services.
- Supporting strong, vibrant and healthy communities.

Key challenges:

- New development may help support existing facilities but they also add pressure on them.
- Identify infrastructure needs of the local community.
- Providing the right range of facilities and services to meet people's needs at all stages of their lives.

Q6. Community and Leisure Facilities

- a) Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
- b) Do you have suggestions for how the Local Plan could resolve these?
- c) Are you aware of any particular community and leisure needs?

Transport

What we know:

The planning system places emphasis on the promotion of sustainable travel which can help to reduce traffic congestion, improve health, promote good quality of life and reduce inequalities. Worthing currently has a range of travel options with good rail links along the coast and to London, a frequent bus service and a relatively high level of cycling compared to other towns. However, many of these options compare poorly in cost and journey time to travel by car and transport systems around Worthing are predominantly car focused with poor usability for pedestrians and cyclists.

Road congestion is a key local concern and during peak periods many parts of the network are affected. Particular problems are on main routes into the town (A259 and A24) and along the A27. These issues impact on local air quality and the existing Grove Lodge Air Quality Management Area was extended in 2014 as a result of continued elevated levels. The Council is preparing a draft Air Quality Action Plan which recognises the importance of planning in promoting alternative modes of travel and preventing increases in congestion. Highways England has proposed a Worthing to Lancing A27 improvement scheme that aims to improve the capacity of the stretch of single carriageway in Worthing and the narrow dual carriageway in Lancing. This is being progressed as part of the Highways England Roads Investment Strategy.

A transport study will be undertaken to assess the transport implications of the Local Plan. This will consider the transport implications of growth and identify the mitigation measures required to address congestion and safety issues.

What must the Local Plan do:

- Undertake an assessment of the transport implications.
- Support a pattern of development which facilitates the use of sustainable modes of transport and minimises the need to travel for goods and people.
- Prevents development where the transport impacts, after mitigation, are severe.

Key challenges:

- There are a limited number of sites where sustainable modes are most suited.
- It will be important to ensure that the Local Plan promotes alternative modes of travel and prevents increases in congestion to help tackle local air quality.

Q7. Transport

- a) Do you agree with the main challenges identified? Are any missing?
- b) Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Environment

What we know:

Worthing is bordered by the South Downs National Park to the north and the coast to the south. The majority of the Borough occupies the coastal plain, with the only breaks in an almost continuous band of development along the coast at the far eastern and western ends of Worthing. These gaps in development between Worthing and Sompting and Ferring and Goring maintain the individual identity of settlements and have retained stretches of undeveloped coast. They also contain pockets of grade 1 agricultural land which is considered to be excellent quality. The Council has published a landscape and ecology study to help inform the production of the Local Plan. This highlights the importance of the setting of the National Park, and the character and landscape of the undeveloped coast.

There is a good network of public rights of way. These provide good recreational opportunities as well as wildlife corridors forming a valuable component of green infrastructure. The Borough also contains a number of areas with statutory and non-statutory nature conservation designations. Although most of these are located in the South Downs National Park, there are a number of Sites of Nature Conservation Importance (SNCI) within the Local Plan area.

Its coastal location with excellent quality bathing water is highly valued however parts of the Borough fronting the seafront are at a risk from flooding along with areas associated with the Ferring Rife in the west and Teville Stream in the east. Large areas of Worthing also experience surface water flooding. Adur and Worthing Councils have undertaken a Strategic Flood Risk Assessment to provide evidence to make informed decisions on development. As the Local Plan progresses this study will be updated where required to further inform the appropriateness of any potential sites located in areas at a high risk of flooding.

Rising sea levels and more frequent extreme weather events mean that the occurrence and severity of both flood and drought events are likely to increase as a result of climate change resulting in a wide range of impacts. Worthing is in an area of serious water stress. It is therefore important that the Local Plan supports Worthing's ability to mitigate and adapt to the effects of climate change.

Historic uses, urban drainage and traffic congestion have resulted in air, land and water pollution which pose a risk to both the environment and people's health.

What must the Local Plan do:

- Recognise the intrinsic character and beauty of the countryside.
- Include strategic policies for the conservation and enhancement of the natural environment, including landscape.
- Maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes.
- Direct development to areas of lowest flood risk first / manage any residual risk.
- Allocate development on land of lesser environmental value.
- Take account of climate change over the longer term.
- Plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- Minimise pollution and other adverse effects on the local/natural environment.

Key challenges:

- Finding the balance between meeting development need whilst maintaining the distinctive character and setting of Worthing.
- Understanding the current and future use and value of undeveloped spaces
- Understanding where development could go ahead and establishing where the environmental impact (even with mitigation) would be inappropriate.
- Ensuring new development protects and seeks to enhance Worthing's important and valued landscape and environment.
- Ensuring that, where opportunities exist, developments create and enhance networks of green infrastructure and result in no net loss of biodiversity.
- Balancing development needs whilst protecting against flood risk.

Q8. Environment

- a) Do you agree with the main environmental challenges identified? Are any missing?
- b) Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
- c) Are there any circumstances you consider where regardless of mitigation development would be inappropriate?
- d) What value do you place on the Borough's green spaces, particularly those around the town?

Housing

Allocating land for housing is a key role of the Local Plan. Worthing will need to grow to meet the needs of an expanding population. The population of the Borough is growing because people are living longer, more children are being born and more people are moving into the town than are leaving. In addition, more people are living on their own than in the past which means even more houses are required to meet housing needs. To help address this, the new Local Plan will need to set housing targets for both market and affordable housing and allocate sufficient land to ensure that these targets can be met. In addition, the Council will need to adopt other housing policies covering, for example, housing mix and density.

The Council has started to update key components of the housing evidence base, including a study which examines the level of housing need in the Borough. This work concludes that the need for new housing is considerably higher than we are currently planning for within the existing Core Strategy. A high level of housing need within the Borough is not new but we are now required to test whether enough sites can be found to meet all of this need. Given the lack of available land within the Borough and significant environmental constraints it is highly unlikely that we will be able to achieve this but it is now the role of the Local Plan review to assess what level of growth we can reasonably and sustainably provide for.

New housing, while helping to meet needs, can also place pressures on existing infrastructure, the environment and natural resources. However, development delivers economic benefits and the opportunity of funding from developers and government to help mitigate those pressures.

What we Know

The way in which the Council needs to Plan for housing has changed. Setting the level of housing to be provided, whilst still based on evidence, is now the responsibility of the local planning authority. The National Planning Policy Framework (NPPF) requires local authorities to undertake housing studies to calculate the Objectively Assessed Need (OAN) of an area. In response to this requirement, and building on previous work, the Council has published the Worthing Housing Study (June 2015). The study takes into account the latest population projections, demographics, household formation rates, economic factors and local dynamics.

The report concludes that the full OAN for housing in the Borough (2013-2033) is 636 dwellings per annum. As summarised in the table below, this is significantly more dwellings than are currently being delivered or that are planned for.

	Total Delivery Requirement	Dwellings Per Annum
Housing requirement previously established in SEP / Core Strategy	4,000 dwellings (2006 - 2026)	200
Housing delivered	2,310 dwellings (2006 - 2015)	257
Objectively Assessed Housing Need (Worthing Housing Study June 2015)	12,720 dwellings (2013 - 2033)	636

It is important to note that this OAN figure represents 'need' in the absence of development constraints – it is not automatically the housing target for the Borough. It is now the role of the Local Plan review to balance housing need alongside other evidence to assess what level of housing can be delivered in a sustainable manner when taking significant environmental and land availability constraints into account.

What the Local Plan Must Do:

- Strike a balance between this clear need for more homes and the impacts that are likely to result from more development. In summary, the Council needs to plan for as many new homes as can be accommodated in a sustainable manner.
- Rigorously and positively assess all opportunities to meet development needs - 'leaving no stone unturned'.
- Consider whether there are overriding constraints locally that mean the Council should plan for a figure below the OAN figure of 636 homes a year. The provision made through the Plan can be different from the OAN but any difference needs to be very well justified.
- Plan for a mix of housing (size, type and tenure) based on current and future demographic trends, market trends and the needs of different groups.

What are the Challenges?

- Balancing the pressing needs for development within a constrained and environmentally sensitive borough with limited development opportunities.
- Where development opportunities do exist there will be a need to consider the needs of different land uses.
- Ensuring that housing developments best respond to the needs of the community, particularly those in need of specialist accommodation.
- Ensuring that development makes the most efficient use of land available by raising densities to maximise housing delivery whilst at the same time ensuring that development is of high quality that respects local character and mitigates any potential impacts.
- Work with neighbouring authorities within the sub-region to consider whether they might have the ability to meet some of the likely shortfall if not enough sites can be found in Worthing to meet the full housing needs.
- Protecting garden land from inappropriate development.

Q9. Housing

- a) Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
- b) How should we best address specialist housing needs (e.g. affordable housing²; family housing; self-build housing, sheltered & extra care, houses in multiple occupation)?
- c) Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
- d) Should the Council include a policy that would resist the inappropriate development of residential gardens?

² As defined by the Government the term 'affordable housing' can include a range of housing types and tenures including social rented, affordable rented, intermediate housing and starter homes.

Development options within the town

All realistic development options in the Borough will need to be tested to assess whether they can contribute towards meeting the identified development needs (housing, retail, leisure, employment etc). In line with Government requirements the starting point in this process is to encourage the effective use of land by reusing sites that have been previously developed (brownfield land).

Housing Land Availability

To understand the capacity of the borough to meet identified housing need the Council is required to assess the amount of land available for housing development and publish the results in a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is a key component of the evidence base to support the delivery of sufficient land for housing and to inform housing policy within the Worthing Local Plan.

The Council has undertaken a comprehensive review of all sites in the town with the potential to deliver housing. These include all sites that the Council is aware of including those which have been promoted during a 'call for sites'. This consultation provides an opportunity to remind landowners, agents and developer that they can submit sites to the Council at any time that they feel might be appropriate for development.

The SHLAA report (December 2015), which assesses all opportunities on sites that could deliver more than 5 dwellings, concludes that there are currently 14 available, suitable and deliverable sites that could deliver approximately 453 dwellings. It is proposed that the most significant of the opportunities identified in the SHLAA are taken forward as Areas of Change within the new Local Plan (see below). The Council will continue to take a positive view on suitable options to increase housing delivery within the town.

In addition to the sites identified below, further housing will also come from unallocated / unidentified sites within the town - these are known as 'windfalls'.

Areas of Change

Alongside the strategic development at West Durrington (700 homes) the adopted Core Strategy identified twelve Areas of Change which were considered to present the best opportunities to deliver regeneration and help provide for some of the housing, leisure and employment opportunities within the borough. It is proposed that this approach for previously developed sites, which was endorsed at the Core Strategy Examination, is taken forward within the new Local Plan.

Whilst some of the Areas of Change identified in the Core Strategy have now been delivered the appropriate redevelopment of the remainder is still supported by the Council. These sites and two more recent additions are listed in the table below.

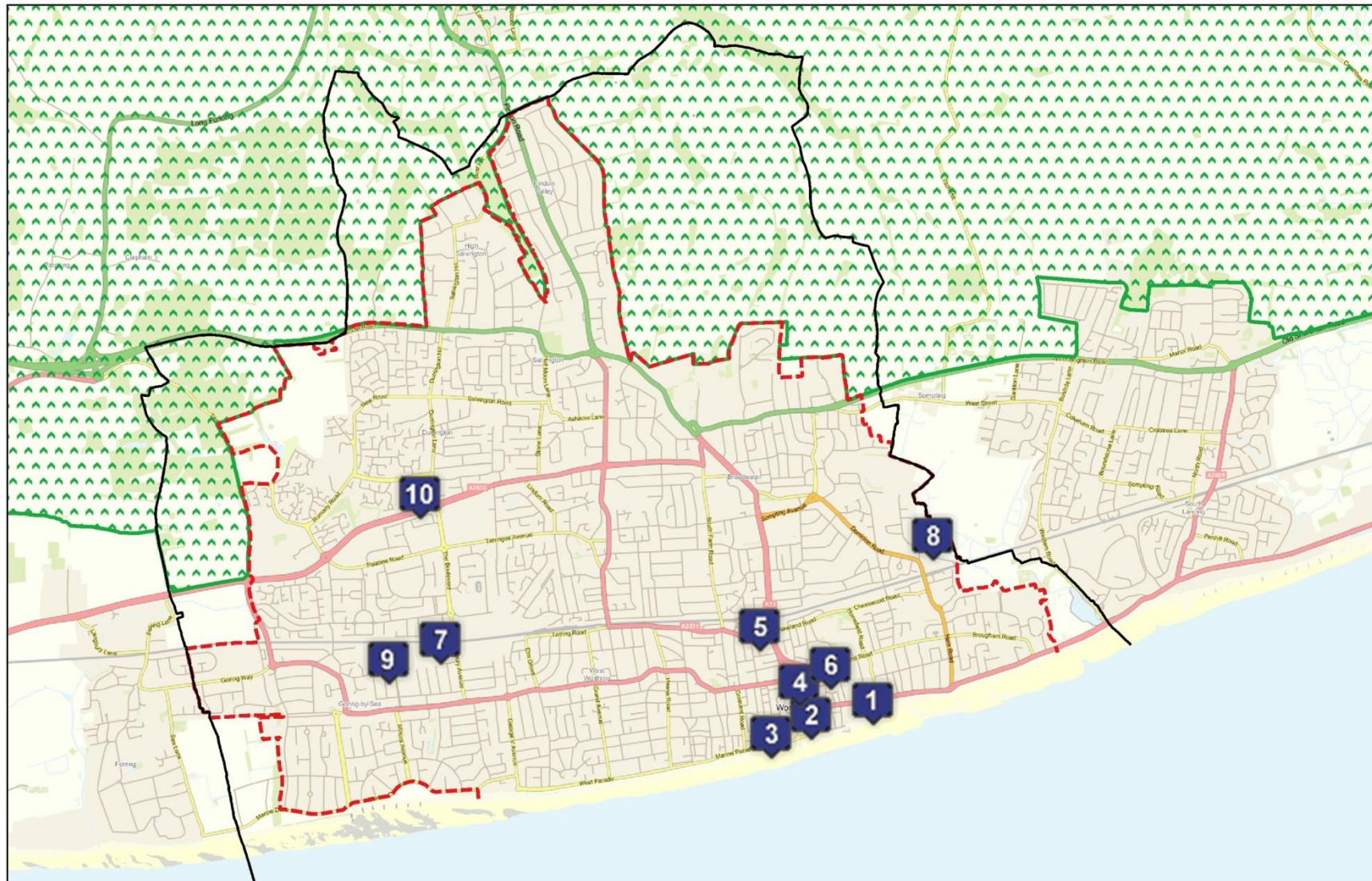
All of these sites are previously developed and located within the built-up area of the town. As such, the principle of redevelopment is accepted and appropriate proposals (in accordance with other policies) could be progressed without the need for a formal allocation or for any change in the town's built-up area boundary designation.

Development of these sites would help to contribute towards the delivery of housing, employment and leisure needs and will also help to meet wider regeneration objectives.

The table below lists the ten proposed Areas of Change within the town where change is expected and will be promoted over the plan period (further information on most of these can also be found in the Core Strategy and the Council's Annual Monitoring Reports).

	Area of Change	Opportunity	Key Issues
1	Aquarena	To deliver a mixed use development on the land occupied by the former swimming pool to help regenerate the area.	Heritage Flood Risk Design
2	Stagecoach Site, Marine Parade	To deliver a mix of uses on this prominent site - subject to the suitable relocation of the current use.	Heritage Flood Risk Relocation of current use Design / mix of uses
3	Grafton Site	To create a new mixed-use development and improve the public realm/lido and enhance access to the seafront.	Land ownership Access Flood risk
4	Union Place South	To deliver a comprehensive mixed use scheme that will improve connections with the town centre and improve leisure / retail circuits.	Mix of uses Connectivity
5	Teville Gate	To establish a distinctive mixed use gateway site that delivers a range of uses.	Connectivity Contaminated land Design / mix of uses
6	British Gas Site Lyndhurst Rd	To deliver a mix of uses on this centrally located site which is currently occupied by redundant gas holder and depot buildings.	Contaminated land Access
7	Martlets Way	To redevelop the parcels of land, with the key focus on employment uses and an extension to the existing business park.	Land assembly /access Level of employment use Contaminated land
8	Decoy Farm	Represents the most significant opportunity in Worthing to bring forward new employment floorspace (open storage, B1, B2, B8 uses)	Contaminated Land Flood Risk Access
9	HMRC Offices, Barrington Rd	Mixed use redevelopment of parts of the site (following the downsizing of current occupiers)	Level of employment use Layout / access
10	Centenary House	Redevelop parts of the site to provide a mix of uses.	Level of employment use

APPENDIX A



©Crown Copyright and database right (2016). Ordnance Survey 100024321 & 100018824

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Licence Number 100024321 & 100018824, 2014

Q10. Development options within the town

- a) Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
- b) Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
- c) Are there any other potential development sites within the current built up area that should be assessed?

Edge of Town Development Opportunities

With the exception of the greenfield development at West Durrington the approach in the Core Strategy was to protect other sites outside the current built-up area boundary and focus development within the town, primarily on previously developed sites. However, given the levels of development needs, identified brownfield sites alone will not be sufficient. The new Local Plan will therefore need to consider all potential opportunities around the Borough and determine whether they can help to contribute towards the delivery of additional housing.

There are very few development opportunities outside the current built up area and all of the realistic options have been promoted by landowners / developers during the 'call for sites' (as they have were during the 2008/9 SHLAA review). Whilst these sites were assessed previously they were not scrutinised in any great detail as the Council could demonstrate to the Core Strategy Inspector that the Borough's needs (as identified in South East Plan) could largely be met within the existing boundary of the town. In this regard, the key difference now is that the higher levels of 'need' (South East Plan vs Objectively Assessed Need) means that there is a need to assess more rigorously all opportunities that lie outside the current built-up area boundary.

As set out in the table below, a total of eight edge of town sites are now being assessed to see whether they have any potential for development. Five of these lie outside the current built-up area boundary and apart from two sites (one in use as a football ground and one as a Caravan Club) all of the others are largely free from development and are considered to be greenfield.

It is important to note that the inclusion of a site in this list in no way indicates the Council's intention to allocate or support development. However, as previously explained, the Council is in a position whereby it must test all potential opportunities to meet identified needs. It will be evidence, which can include consultation responses, that will be used to help determine which (if any) of these sites should be put forward for development in the draft Local Plan to be prepared in the coming months.

A range of evidence will be used to help inform decisions as to whether sites should be allocated for development. A key piece of evidence is the Landscape and Ecology Study (TBC 2016) which reviews the environmental constraints and landscape capacity of sites promoted for development around the borough. Taking landscape, ecological and visual assessments into account the study concludes by setting out the overall suitability for development for each site. These conclusions are summarised in the table below. It should be noted that whilst the Landscape and Ecology study is a very important part of the evidence used to consider the development potential of greenfield sites around the borough it is only part of a suite of evidence that will help to inform the suitability of sites. Other considerations such as infrastructure capacity, transport & accessibility and the comments received during consultation stages will also be important. It will only be when

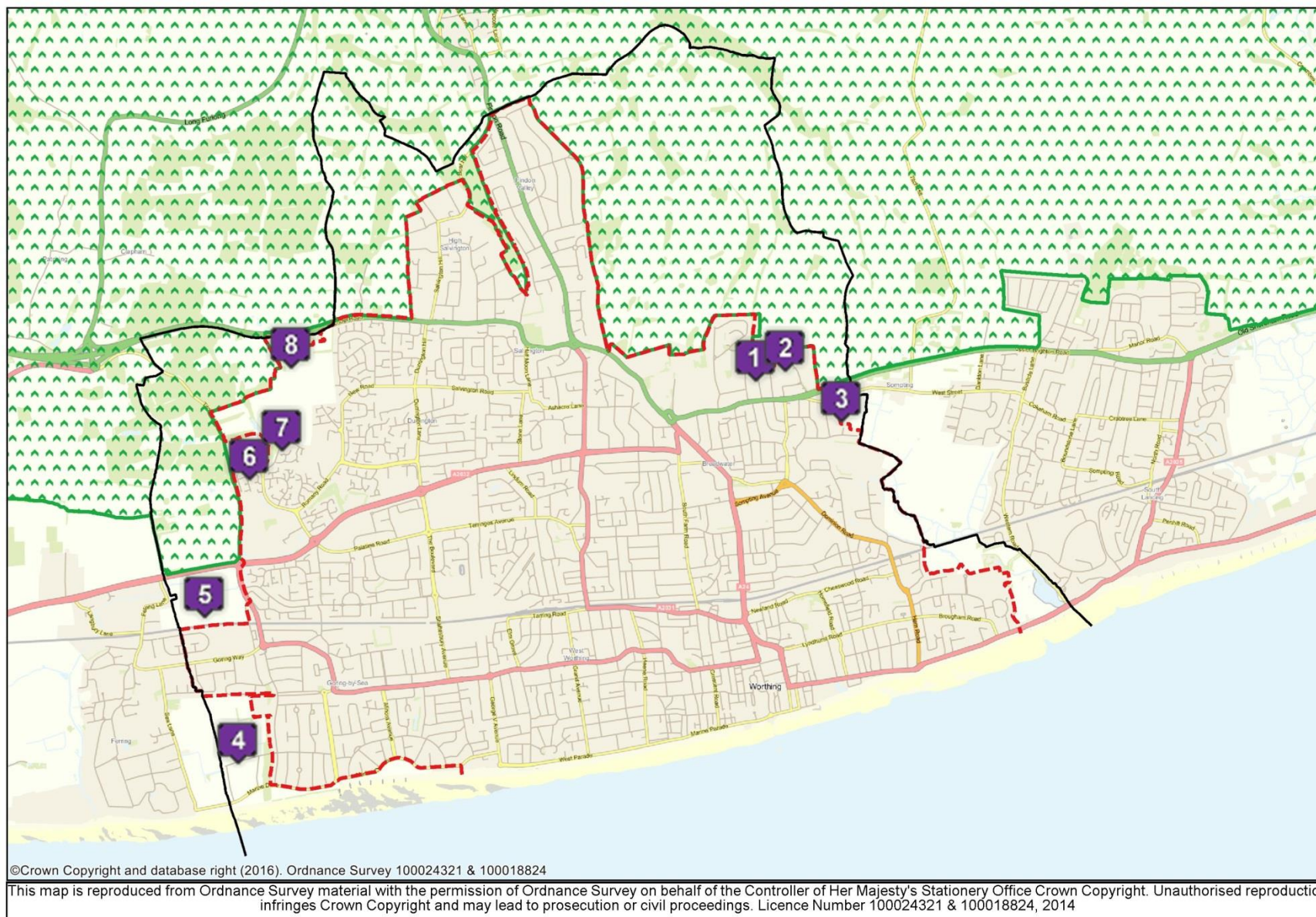
all of this is in place that the Council will be in a position to weigh up development needs against the capacity for some of these sites to meet some of that need.

	Site	Site description	Landscape Study findings ³	Key Issues
1	North of Beeches Avenue	2.8ha site located to the northeast of the Borough. Site is bounded on 3 sides by the Built up Area boundary and the South Downs National Park (SDNP) to the north. Currently used as paddock, grazing land and car repairers.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Relocation of existing business
2	Worthing United FC	1.5ha site located in the north east of the Borough adjacent to the SDNP. Currently used as a football club. Is within the Built Up Area boundary.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Relocation of football club
3	Upper Brighton Rd	4.4ha site located in the north east of the Borough, in an area of open green space between Worthing and Sompting. The northern part of the site adjoining the A27 is currently in equestrian use.	Splits the site into northern and southern portions. Development on the northern part of the site would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP. The rest of the site is potentially suitable for limited development proposals.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Heritage
4	Goring - Ferring gap	32ha site located in the south west of the Borough which mainly consists of open agricultural land. There are playing fields in the north east part of the site.	Development would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP.	<ul style="list-style-type: none"> ● Coastal setting ● Coalescence ● Heritage ● Amenity space ● Flood risk (part)
5	Chatsmore Farm	28.1ha site located in the west of the Borough, which consists of open/arable land in agricultural use	Development would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP.	<ul style="list-style-type: none"> ● SDNP ● Coalescence ● Agricultural land (Grade 1) ● Flood risk (part)

³ These findings will need to be balanced with all other evidence to determine the suitability of sites for development.

	Site	Site description	Landscape Study findings ⁴	Key Issues
6	Caravan Club, Titnore Way	5.7ha site located in the north west of the Borough, currently leased by the Caravan Club. In use as a caravan site with associated facilities - 79 pitches.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> Existing use
7	West of Fulbeck Avenue	0.8ha site located in the north west of the Borough which consists of unmanaged scrub. The site is within the Built Up Area boundary.	Splits the site into northern and southern portions. The northern part of the site is potentially suitable for limited development proposals. The rest of the site is less constrained and could accommodate development without significant detrimental effects on the character of the landscape.	<ul style="list-style-type: none"> Ecology Adjacent SNCI
8	North of West Durrington	9.8ha site located in the north west of the Borough. The site is currently in agricultural use. It sits to the south of the boundary with the SDNP and to the west is the listed Castle Goring. The site lies north of the West Durrington Strategic Development and is within the Built Up Area boundary.	Splits the site into three portions. Development in the west of the site would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP. The central part of the site could accommodate development due to its generally lower sensitivity or value. The east of the site is less constrained and could accommodate development without significant detrimental effects on the character of the landscape.	<ul style="list-style-type: none"> SDNP Heritage

⁴ These findings will need to be balanced with all other evidence to determine the suitability of sites for development.



Q11. Edge of Town Development Opportunities

- a) Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
- b) If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
- c) If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
- d) Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Planning Policies

The Local Plan is a critical tool in guiding decisions about individual development proposals as its policies are the starting-point for considering whether applications in Worthing can be approved. The Core Strategy currently contains a number of policies and, in addition, there are several saved policies from the Worthing Local Plan (2003). These policies cover a wide range of issues relating to land use. However, in line with prevailing guidance the Core Strategy didn't duplicate policies that were already established at the regional or national level. Since the adoption of the Core Strategy the regional strategy (the South East Plan) has been rescinded and the number of national policies and guidance document has been reduced. This has resulted in a partial policy vacuum at the local level.

The development of a new Local Plan, which will replace all existing local policies, provides the opportunity to bring all policies together in one place. It will also allow for existing policies to be updated and others to be added to ensure that there is an appropriate coverage of policies for Worthing to guide development. Although it is anticipated that the new Local Plan will contain more policies than currently set out in the Core Strategy it will be important to ensure that all policies are locally specific and supported by evidence. Overall, the policies will provide a robust position against which future proposals for development in the Borough can be determined.

List of policies expected to be included in the Local Plan:

Policy	Aim / Intention
Presumption in favour of sustainable development	Presumption established in NPPF which planning authorities are encouraged to incorporate within their Local Plans
Countryside and Coast	Protect the landscape character of the coast, countryside and South Downs National Park (and setting of)
Policies for places	Support growth and change in key areas of Worthing
Quality of the built environment + public realm	Development is of high architectural quality and opportunities are taken to improve the public realm
A strategic approach to the historic environment	Conserve and enhance the historic environment and character of Worthing
The historic environment	Protect designated heritage assets and their settings.
Sustainable design	Require higher water efficiency levels above national standards
Energy	Support standalone energy schemes and require a proportion of energy used in development to be from renewable or low carbon sources
Housing Mix and quality	Ensure an appropriate mix of dwelling types, tenures and sizes that respond to local need and meet national minimum space standards (and where possible standards for accessible/adaptable dwellings)

Affordable housing	Deliver affordable housing to meet identified need
Density	Ensure developments maximise use of available land (whilst also responding to local character)
Gypsies, travellers and travelling showpeople	Establish criteria against which any applications for gypsy travellers / travelling showpeople sites can be assessed against
Protecting and enhancing existing employment sites	Protect and enhance existing employment sites
The visitor economy	Support provision of visitor facilities
Retail hierarchy	Protect and support the growth of the town centres and the hierarchy of local shopping areas
Transport and connectivity	Secure improvements to the transport network / promote sustainable travel
Delivering infrastructure	Ensure development is supported by necessary infrastructure
Green infrastructure	Enhance and improve access to green infrastructure by incorporate elements into developments
Biodiversity	Ensure protection, conservation and, where possible, enhancement of biodiversity
Open space, recreation and leisure	Protect existing facilities and ensure adequate future provision to support growing communities.
Planning for sustainable communities	Protect and support improvements to local social and community facilities
Pollution and contamination	Ensure development does not result in unacceptable levels of pollution
Water quality and protection	Ensure no deterioration and where possible improve surface water and groundwater quality
Flood risk and sustainable drainage	Manage and where possible reduce the current and future risks of flooding
Telecommunications	Establish approach for managing telecommunications development

The draft version of the Local Plan, which will be published for consultation, will include the proposed wording for all these policies. Whilst there will be an opportunity to comment on the full policies in due course we are now seeking your initial views:

Q12. Planning Policies

- a) Do you have any views on how any of these policies should be worded?
- b) Are there any policies missing from the list?
- c) Are all of these policies are required?

Contact / How to get involved

This consultation period on the Local Plan Issues and Options starts on **XX** and ends on **XX**. If you want to comment we encourage you to fill in the **e-form** on our website or email us your comments as they are the quickest and cheapest methods of replying. Alternatively you can send us your comments by post. Responding means we will automatically notify you of future consultation exercises relating to the Local Plan.



Website: XX

Email: XX



01903 239999



Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

Any comments received cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998 the personal information you provide will only be used by the Council for the purposes associated with the Worthing Local Plan.

If you do not have access to the internet hard copies of all documents are available to view at the main Council offices and in the libraries throughout the Borough.

What Happens Next?

Following consideration of responses to this consultation, we will proceed to prepare a draft Plan which will be published for two stages of public consultation. The Plan will then be submitted to the Secretary of State and representations will be invited on the Plan's soundness. An independent Examination in Public will then follow to consider the soundness of the document. Subject to the Plan being found sound the Council will then adopt it. These steps are summarised below.

The Local Plan preparation timetable is set out in the Council's Local Development Scheme. Throughout the preparation of the new Plan the Council will continue to work on and publish (on our web site) an updated evidence base.

1	Issues and Options - After this consultation we will analyse all the responses and produce a consultation summary of what we've learnt from what people told us.
2	Preferred Options - We'll test options through sustainability appraisal and assess their deliverability. We'll prepare a preferred options document, showing options for site allocations and new / updated policies. There will be a public consultation on the preferred options followed by a consultation summary.
3	Publication of the Draft Local Plan - Then we will prepare a submission plan and hold a further public consultation on it.
4	Submission and Examination - We'll then submit it and all its associated background evidence and consultation responses for examination by an independent Planning Inspector, who will hold public hearing sessions.
5	Adoption - Once we've received the Inspector's report and if necessary consulted on any recommended changes, we'll adopt the plan as part of our development plan.
6	Monitoring and Implementation - We then monitor to check whether the plan policies and allocated sites are being implemented as planned.