



**WORTHING BOROUGH
COUNCIL**

**Planning Committee
22 July 2020**

Agenda Item 5

Ward: ALL

Key Decision: ~~Yes~~ / No

Report by the Director for Economy

Planning Applications

1

Application Number: AWD/1979/19

**Recommendation – Approve subject to
completion of s.106 Planning Obligation**

Site: HM Revenues And Customs, Barrington Road, Worthing

Proposal: Outline planning permission for the demolition and phased, comprehensive, residential-led redevelopment for a maximum of 287 dwellings (use class C3), of which up to 140 would be houses and up to 158 would be apartments/retirement apartments. Provision of a 68-bedroom care home (use class C2). Provision of car parking, landscaping and associated works. All detailed matters reserved except for access points at the site boundaries.

2

Application Number: AWD/0769/20

**Recommendation – Delegate to Head of
Planning for approval subject to the
receipt of satisfactory comments from
consultees.**

Site: Development Site at 106 to 108 Warren Road, Worthing

Proposal: Demolition of No's. 106 and 108 and construction of a two and a half storey 82no. bedroom care home (C2 Use) and associated car parking and facilities.

Application Number: AWDM/1979/19

**Recommendation – Approve
subject to completion of s.106
Planning Obligation.**

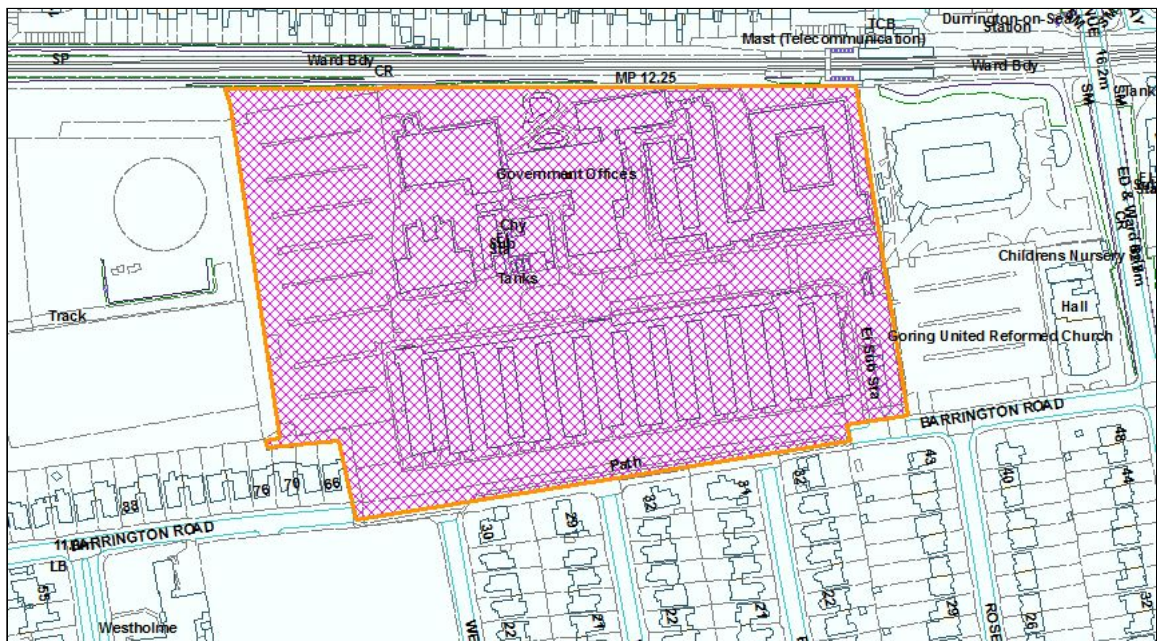
Site: HM Revenues and Customs, Barrington Road, Worthing

Proposal: Outline planning permission for the demolition and phased, comprehensive, residential-led redevelopment for a maximum of 287 dwellings (use class C3), of which up to 140 would be houses and up to 158 would be apartments/retirement apartments. Provision of a 68-bedroom care home (use class C2). Provision of car parking, landscaping and associated works. All detailed matters reserved except for access points at the site boundaries.

**Applicant: Cannon Capital
Developments Ltd.**

Ward: Goring

Case Officer: Stephen Cantwell



Not to Scale

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Site and Surroundings

The application site comprises a roughly rectangular area of approximately 6 ha containing office buildings of varied heights up to five storeys dating largely from the 1960s. The site is located between Barrington Road to the south and the coastal railway line to the north. Durrington-on-Sea railway station is immediately adjacent to the north east corner of the site and is connected to it by a gated pathway from its southern platform and footbridge. The long, straight pathway continues along the

eastern boundary of the site connecting to Barrington Road, it separates the site from the adjoining grounds and car park of Durrington Bridge House, which is a large modern office building also owned by the applicant; the boundary is marked by chain-link fencing.

Vehicular access to the site is via the head of a short cul-de-sac section of Barrington Road, which also serves an adjoining residential street, Roseberry Avenue, Goring Unite Reformed Church & children's nursery and Durrington Bridge House. The cul-de-sac leads from a T-Junction with Shaftesbury Avenue, 130m to the east of the site; this junction is nearly opposite the access to Worthing Leisure Centre at the foot of the road bridge.

A pedestrian only footpath continues westwards from the cul-de-sac along the southern boundary of the site. This is flanked by a tall, continuous hedgerow on its northern side and the cul-de-sac ends of three further residential streets between Elgin Road and Wellesley Avenue. The path emerges into a second vehicular section of Barrington Road containing bungalows, which subsequently connects into other residential streets (such as Clive Avenue and Mulberry Lane), eventually into the A259 Goring Road.

The western boundary is mainly with two areas of vacant land beyond. It is marked by a line of large, mature trees, most are holm oak. Part of the neighbouring land beyond is owned by Southern Gas Network, and formerly held a gas container, now dismantled. The southern part of the western neighbouring land is vacant, overgrown land also owned by the applicant, which amounts to some 0.8ha and is referred to them as the 'nib'. Beyond this is other industrial land and premises served via Martletts Way. At the south west corner the site touches the rear and side boundaries of bungalows in Barrington Road. Much of the western part of the site near the western boundary comprises a large tarmac-surfaced car park for around 450 cars.

Within the site a mixture of concrete, glass and steel office buildings are concentrated in the central area. Heights are largely up to three storeys but with one lengthy five storey building orientated north-south. Along the southern boundary is an older single storey brick building originally used as a WWII. military hospital. This has a main spine and numerous narrow wings (former wards), also in use as offices and staff facilities. The site operates as a secure premises occupied by HMRC with tall chain link fences and gates at each boundary. There are occasional semi-mature trees in landscaped lawns and a tall leylandii row along the northern railway edge.

The site is largely flat, with a subtle level variation of 2m, the lowest point being the north eastern corner near Durrington Station, rising towards the south west corner. It is within Flood Zone 1, with low flood risk probability. The Shaftesbury Avenue Conservation Area (comprising inter-war 'sun-trap houses') is 150m to the south east. Field Place is the closest listed building, situated approximately 300m to the north east of the Site.

Local shops and medical centre at Strand Parade and The Causeway are 200m to the north and are reached either via the railway footbridge at Durrington Station or a

longer route via Shaftesbury Avenue. Bus services run along Shaftesbury Avenue, including the frequent 'Pulse' to the town centre.

Proposal

The application seeks outline planning permission for a predominantly residential redevelopment of the site to comprise up to 287 homes (reduced from 296 by recent amendments) and a 68 bed care home. A proposal to include 160sqm flexible retail space has been deleted recently. Apart from the number of homes and size of the care home, the only detail proposed for determination at this stage is site access. Details of appearance, landscaping, layout, scale and access *within* (as distinct from *into*) the site, are reserved.

The application proposes that the maximum of 287 dwellings would be achieved by a mixture of houses and apartments as follows:

- Up to 129 houses of 2, 3 & 4 Bed detached, terraced and semi-detached houses
- Up to 158 apartments contained within 3 or 4 blocks of 3-7 storeys
- Approximately 351 car parking spaces.

This would occupy approximately 5.19 ha of the site, excluding 0.323ha of public open space, giving a density of 55.3 dwellings/ha if the maximum number is realised. The 68 bed care home would occupy the remaining 0.49ha including 28 further parking spaces.

The vehicular access for which detailed permission is sought would be a reconstructed version of the existing access to Barrington Road at the south east corner. Additional pedestrian accesses would be via the southern and eastern boundaries, along existing footpaths. A secondary vehicular access from the western part of Barrington Road would serve a few new homes and emergency vehicles. Details of the car and cycle parking arrangements would form part of a reserved matters application but the current application refers to the intended number of parking spaces and relates these to the number of apartments and a possible size-mix for the houses.

The potential layout, appearance and landscaping of the site is shown in two illustrative layouts (Options A & B), which are included later in this report. These indicate the possible number and size of new houses and an arrangement of streets and spaces together with the number of apartment blocks (4no blocks. in Option A and 3no blocks in Option B).

Alongside these illustrative layouts is a series of parameter plans which have been submitted for approval. These show matters such as the varied heights of apartment blocks (between 3 – 7 storeys); the extent of proposed built-up areas and public realm (i.e. roads and open spaces); proposed vehicular and pedestrian routes and emergency access, also the retention and adding of boundary planting. The application proposes that these plans would become part of an outline approval and that a later reserved matters application should be in accordance with them. The stated intention is to allow flexibility for the eventual developer of the site.

The application identifies the 0.8ha nib of land which the applicant owns beyond the western boundary of the site. It states that this will be promoted with other land to the west for a commercially led, mixed use scheme, with access for commercial uses from Martletts Way. This is in response to the draft policy AOC6 in the emerging Worthing Local Plan, which identifies an employment-led development for some 10,000sqm employment space, with provision for some residential development. The indicative layout plans show a potential vehicular access from the application site into the nib land.

Relevant Planning History

EIAOPINION/0001/19 - EIA Screening Opinion for mixed used development comprising up to 147 residential dwellings, up to 165 retirement apartments, a care home for 68 residents and associated parking, landscaping and works incidental to the redevelopment of the site.

EIA Not Required

29.11. 2019

AWDM/1625/19. Application for Certificate of Lawfulness for Existing Use as Office (B1 a)

GRANTED

24.12.2019

AWDM/1625/19. Application for permitted development for prior approval for change of use from B1 (a) Office for up to 254 residential units (C3)
APPROVED 24.12.2019

Consultations

WSCC Highways – Further comments awaited

Comments on recent amended plans are awaited. Previous comments are:

- Shaftesbury Avenue junctions with Barrington Road and Marlborough Road - No further modelling and safety audit required.
- Parking – Further information required regarding number and distribution. Risk of parking by commuters and/or further on-street parking and/or off-site on local roads might occur if parking provision for the development is insufficient. Road designs should be capable of adoption but WSCC would not wish to try to enforce parking by provision of retrospective Traffic Regulation Orders (TROs) within the site given that there is no guarantee of success of the order. As such, the applicant should ensure that parking provision is satisfactory and that roads are left private and satisfactorily managed by a private management company to prevent parking by commuters to office workers.
- Sustainable travel: should include travel vouchers, details of cycle hire scheme and three car club vehicles. a clear set of penalty measures needed if proposed trip-rates are not met e.g. commitment to providing additional travel vouchers etc.
- Barrington Road, western end – existing ponding here and along southern footpath to be addressed by drainage at detailed design stage

- Cycle connections to southern streets (Elgin Road & Walpole/Wellesley Avenues), detailed design to be included at reserved matters stage but confirmation required at outline that safety assessment requirements and lighting requirements can be met.
- Eastern boundary – position of proposed footpath to be clarified
- Internal roads should be designed to avoid speeding on long, straight roads.

More recent informal comment from the Highway Authority on amended plans indicates that parking ratios are improved and may be acceptable subject to design. Manoeuvring space and sizes in side streets should be improved. Further information needed to show manoeuvring for fire appliance and service/cleansing vehicles. Service margins are not provided in side roads and therefore these would not be adoptable. The alignment of the access road to the western nib land to be amended.

Subject to final comment the following to be included in a s106 Agreement:

- Bus stop improvements including real-time information;
- Re-marking of roads including right hand turning lane on Shaftesbury Ave
- Shared foot and cycleway path along southern boundary
- Traffic road order (yellow line) in-and-around new turning head in Barrington Road western end.
- Travel Plan.
- Management Company and street maintenance
- Non-adoption road clauses (for areas either not offered or not suitable for adoption under S38).
- Any other highways works outside of the red boundary line.

WSCC Public Rights of Way Team – No objection

No recorded public rights of way (PROWs) affected by the proposal. The proposed pedestrian and cycle routes are supported. Clarification sought as to their intended status e.g. whether to be dedicated as public rights of way

WSCC Fire & Rescue – No response

District Parking Services – Comments

In respect of highways access and parking, subject to sufficient car parking provision being provided, no concerns raised. To reduce the number of cars, consideration should be given to electric vehicle charging points and car club parking bays.

Network Rail – No objections

The proposal has potential to affect Network Rail Land and Infrastructure and therefore the developer would need to ensure the proposal does not encroach onto Network Rail land, affect the safety, operation or integrity of the company's railway and its infrastructure, undermine its support zone, damage the company's infrastructure, place additional load on cuttings, adversely affect any railway land or

structure, over-sail or encroach upon the air-space of any Network Rail land and cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.

Planning conditions and informative notes required in relation to drainage, access for maintenance, operation of plant (including scaffolding) and storage of materials, piling, boundary treatment, external lighting, noise and vibration, landscaping and measures to protect the railway boundary.

Environmental Health officer:

Noise – Further information requested

A further noise assessment should be submitted prior to the application being decided. The current acoustic assessment does not demonstrate consideration of the impact of noise from trains particularly at night and from the railway station and from the adjacent commercial building, for example any external plant. For proposed homes which would be affected by noise sufficient ventilation would be required, where external noise levels would prohibit the opening of windows for ventilation, and an overheating assessment to identify the level of ventilation that is required. Noise levels for communal gardens or balconies proposed for the flats should also be assessed and discussed.

Contamination - Comments

Results of further investigations should be submitted following demolition of the buildings in the main part of the site and the removal of all dense vegetation in the western part of the site.

[Planning officer comment: Therefore clarification has been requested as to whether a variation of the standard land remediation condition would be sufficient, to require this further information following demolition works but prior to other works]

Air quality – comments to follow

Also, planning conditions would be needed to control working hours and the agreement and implementation of a construction management plan would be required during site works to address matters such as noise, vehicle routing and burning on-site

Environmental Health (Private Sector Housing) – No comments

No comments at this outline application stage but early input into the design and internal layout of proposed dwellings would be beneficial.

Waste Services Officer: - Comments

Following review of recent vehicle tracking plans, access for refuse collection vehicles depends on no obstruction by on-street parking

Lead Local Flood Authority – Further information required

Low flood risk but small pockets of higher risk within the site, including groundwater flooding risk. Any surface water flow paths should be maintained and mitigation measures proposed for areas at high risk.

For sustainable surface water drainage (SuDS):

- Clarification requested as to why additional storage cannot be provided to achieve greenfield runoff rates or close to,
- Currently a swale and below ground attenuation with restricted discharge to the main sewer are shown. Land raising and pumped solutions to connect to the existing surface water sewer are not considered sustainable.
- Surface features in open spaces that allow biodiversity and amenity benefits, green roofs, permeable paving, and ground infiltration should be investigated.
- Further information required to ensure the current strategy can accommodate the number of proposed units.

Drainage Engineer – Further information required,

- Low risk flood zone 1.
- Concerns regarding the current drainage strategy and how implementable a SuDS solution is going to be.
- Due to potential land contamination, further investigation required in respect of potential ground infiltration SuDS and attenuation.
- An attenuation SuDS feature [pond] should not be counted within open space provision. This has been removed in the amended plan but this is contrary to SuDS principles as there would then be no amenity or biodiversity benefits also having longer lifespans and lower maintenance requirements, as such removal is not supported.
- Some proposed land raising along with pumping to connect to a fairly shallow surface water sewer working against the natural topography isn't a sustainable solution. Use of green roofs, permeable paving, swales, open attenuation features, etc. would likely result in a gravity connection without ground raising or pumping being achievable.
- Different forms of SuDS and reduction in urban density should be considered.
- Greenfield rates should be met where possible, or as close to it as possible. Evidence is needed.
- Planning conditions would be needed to minimise the risk of flooding, to secure details of the SuDS drainage strategy with associated maintenance and management strategy, and certification to ensure correct implementation.

Environment Agency – No objection

The proposal is acceptable subject to planning conditions and informative notes to secure the mitigation of ground contamination, restrictions on drainage systems for the infiltration of surface water into the ground and restrictions on piling/penetrative ground construction.

Southern Water Services – No objection

- Southern Water can provide sewage disposal for the proposal. However, existing water mains and sewer infrastructure needs to be taken into account in the final layout and details of foul and surface water drainage should be secured via planning condition.
- Surface water flows would be reduced, a betterment from the current situation and the developer can discharge surface water flow no greater than existing levels where it is ensured that there is no overall increase in flows into the surface water system.
- The proposal would also need to comply with the following hierarchy a) An adequate soakaway or some other adequate infiltration system, b) A water course, c) Where neither of the above is practicable: a sewer. Appropriate arrangement for long term maintenance of any SUDS facilities would also be required.

Southern Power Networks – Comments:

The proposed development is in close proximity to their infrastructure (sub-station) and guidance is provided for such circumstances including reference to ensuring safe distances are maintained to preserve the amenity of future occupiers e.g. from noise and vibration emitted by transformers, ensuring access is maintained for servicing and ensuring works by the developers close to such infrastructure are done safely, amongst other guidance.

Southern Gas Networks – No response received.

WSSC Archaeology – No Objection

Planning conditions for suitable mitigation measures (below-ground archaeological investigation including field surveys) and finds are adequately recorded.

South Downs National Park Authority – No objection

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the impact on The National Park when making its determination. Due to distance and urban context it is unlikely to have an adverse impact on the setting and special qualities of the National Park. Appropriate lighting should be secured via planning condition.

Sussex Police: - No comments received

NHS Clinical Commissioning Group - Awaited

Head of Housing - Awaited

Borough Landscape and Tree Officer – No objection in principle but further information requested:

- Western boundary - scope for roads and parking bays to run along this boundary but further detail such as distances from trees, road construction, services, kerbs, drainage, method statement to protect tree roots is required;
- North-west corner - some of the largest and densest trees here, houses close to boundary trees would create problems of future pressure to greatly reduce/remove the trees e.g. due to shading;
- Northern (Railway) Boundary - the Conifer trees in good health and provide a useful screening but trees should not be within private gardens to ensure their long term retention and maintenance. In addition, a 4m buffer should be provided in front of these trees;
- Eastern Boundary - 4 metres buffer proposed along the footpath to the Railway Station which is adequate for additional landscaping;
- Southern Boundary – proposal to construct a new road within/close to existing hedge row. Further information required such as position of the road to ensure hedgerow would be retained and adequately protected. Regular maintenance of hedgerow would be required to avoid excessive shading of adjacent dwellings. New tree planting – clarification over whether street trees are in private front gardens or within roads.

Parks Manager – comments that,

The central green does provide an opportunity for informal open space, tree planting and biodiversity enhancements. This area could also provide for an equipped childrens play area and ideally this area of open space should be adopted by the LPA with a commuted sum for its future maintenance. A contribution of circa £100k for off site open space could address the needs for older children play space and formal recreational facilities.

Representations

A total of 7 representations received, 5 of which raise objections (from Bruce Avenue, Upton Gardens, Rosebery Avenue and Shaftesbury Avenue), 1 representation is in support (from New Church Road) and 1 makes comment (from Chesterfield Road).

The objections relate to:

- Insufficient off road car parking being proposed to meet the needs of future occupiers, which, when taking into account cumulative impacts, the proposal would result in an adverse impact on on-street parking demand to the detriment of highway safety
- Adverse impact on air quality taking into account cumulative impacts
- Lack of local infrastructure including school places and medical facilities (GP) to accommodate the proposed development taking into account existing and proposed housing within the locality
- Adverse impact on highway safety through inadequate access arrangements and increased traffic generation on local highways infrastructure from construction traffic and future occupiers. In addition, increased traffic would exacerbate damage existing road surfacing

- Excessive height proposed for the apartments creating intimating environment for route to train station
- Proposal would have an adverse impact on flood risk taking into account an existing underground stream within the site
- Adverse impact on neighbouring residential amenity from loss of light, outlook and privacy from potential 3-storey heights, as well as increased noise, disturbance and smells/odours associated with the proposed commercial uses and the comings and goings of future occupiers
- Adverse impact on existing trees and landscaping with insufficient replacement planting proposed

The comments in support and other comments indicate:

- Proposal would help meet local housing need
- More appropriate form of development on this site to include low density social housing (200 units) with 1.5 car parking spaces per unit, new health centre and more public open space and trees/landscaping
- Car ownership restrictions should be applied to future occupiers of the scheme.
- The supporting traffic surveys are out of date
- In terms of alternative options, plan 'B' could be acceptable subject to the proposed apartments within north-east were limited to 3 or 4 storey to avoid overshadowing to neighbouring properties
- Network rail should be consulted as the pedestrian platform bridge is not usable for disabled, elderly, prams and heavy loads – as it is proposed to become a 24hr hour access, improvements should be considered
- The green footpath to the south of the site (to Barrington Road) should be designated as a public right of way and should remain a path for pedestrians and cyclists to encourage sustainable forms of transport and to promote biodiversity/wildlife corridors – the applicant has confirmed the path will be retained for the use of pedestrians/cyclists.

Relevant Planning Policies and Guidance

Worthing Core Strategy 2006-2026 (WBC 2011): Policy 2, 3, 4, 7,8,10, 12, 13, 15, 16 17, 18 & 19; also Area of Change 8 Land Adjacent to Martletts Way
 Worthing Local Plan (WBC 2003) (*saved policies*): RES7, RES9, TR9 & H18
 Supplementary Planning Document 'Space Standards' (WBC 2012)
 'Infrastructure Delivery Plan' (WBC 2010)
 Tall Buildings Guidance (WBC, 2013)
 Developer Contributions' (WBC 2015)

Guidance on 'Parking Standards for New Development (WSCC 2019)
 The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1 (WSCC 2003)

National Planning Policy Framework (NPPF - February 2019)
 National Planning Practice Guidance (NPPG).

Circular 04/07 'Tree Preservation Orders: A Guide to the Law and Good Practice' (DETR 2000)

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.

Although the site does not adjoin any conservation area or listed building, Shaftesbury Avenue Conservation Area is located to the south of the site and there is duty placed on planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area as required by Section 72(1) Planning, Listed Buildings and Conservation Areas Act 1990, and to have special regard to the desirability of preserving its setting of and any features of special architectural or historic interest (under Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990).

In respect of the Town and Country Planning Environmental Impact Assessment Regulations 2017, this outline application is not considered to constitute Environmental Impact Assessment development. A screening opinion was issued in November 2019 and the application accords with this. In any event many matters of environmental importance are relevant considerations in the determination of this application as considered in the planning assessment below.

Planning Assessment

Principle of Development

Policy 4 of the 2011 Core Strategy seeks to safeguard sites in existing employment use and that other forms of development will only be permitted where it is satisfactorily demonstrated that the site is genuinely redundant and there is no demand for the site for employment purposes. The loss of a small proportion of employment floorspace may be acceptable where it would lead to a significant upgrade of the remaining employment floorspace. In the emerging Local Plan (consultation draft October 2018), the site and an additional 0.8ha 'nib' of land to the west, is identified as an Area of Change (AOC5), for which a future redevelopment of mixed residential (250 dwellings) and employment uses (2,500sqm) would be supported.

Although the emerging plan has little current weight, the proposed application is consistent with NPPF, para 120, which supports the alternative use of land which would contribute to meeting an unmet need for development in the area. In this case there are unmet needs in the Borough for housing, which supports the mixed

use redevelopment approach of emerging policy AOC5. Secondly, the approach can be seen to acknowledge the permitted development changes since 2013, which allow for offices to be converted for residential use. In the case of the application site a Certificate of Lawful Development has been granted confirming that the existing buildings can be converted upto 254 dwellings without planning permission.

Whilst the proposed use would be contrary to Policy 4, the material considerations of the emerging policy, NPPF and permitted development rights combined are afforded considerable weight. It is also recognised that the wider HMRC site includes both the western nib and Durrington Bridge House immediately to the east. In terms of housing need Members are aware that the Council cannot demonstrate a 5 year supply of housing and therefore as indicated BY NPPF there is a presumption in favour of sustainable development and there is a 'tilted balance' in favour of the proposed development.

The current proposals, which would demolish the ageing and deteriorating buildings on site, also provide an opportunity to consolidate employment uses within the more modern office Durrington Bridge House. This could be achieved by legal agreement, to secure a continued use for employment use, whether by HMRC or another future occupier. The applicant has indicated its desire to retain this building in office use although given the uncertainty of future office demand in a post covid world, the applicant has suggested that any restriction would need to be time limited. This would allow some flexibility on the basis that an office occupier may not be found after HMRC vacants the building. The restriction would also prevent the building from being converted to residential use under permitted development rights.

To the west, of the current application the 'nib' land and vacant land parcels comprising the former SGN gasholder (demolished) site to its north and land at Martletts Way are part of Area of Change Site 8 in the 2011 Core Strategy for a mixed development of employment and residential uses. The achievement of suitable access is said to require collaborative working between landowners.

In the emerging Local Plan, the 'nib' land is identified for employment use along with the land to the north (Gasholder and Martletts Way site) to reflect the demand for new employment floorspace in the Borough (Area of Change site AOC6). It states that suitable access and layout arrangements should facilitate development coming forward for the land as a whole.

The current application provides opportunity for access to be extended westwards into the 'nib' and beyond, to facilitate development of part of the Area of Change land. It is understood that the applicant is in discussion with the adjoining land owners as part of a collaborative approach to ensure employment land on the Martletts Way and gas holder sites facilitated by residential development on the nib land. Whilst, this approach would be contrary to the emerging Local Plan, it would form part of a comprehensive development ensuring the long awaited employment development on the Martletts Way site. The 'nib' land has been excluded from the current application site to ensure a more comprehensive development to the remaining parcels of land.

Subject to the completion of a legal agreement for provision of access to the 'nib' and AOC land and the retention of Durrington Bridge House for employment use, the benefits of the development in terms of facilitating and securing future mixed uses in the wider area, are considered to outweigh the presumption against loss of existing employment use under Policy 4. This is particularly relevant in the context of a lack of a 5 year supply of housing and the permitted development rights available to convert the existing buildings.

The acceptability of residential use here also depends upon its potential to provide a high quality and sustainable development, in accordance with NPPF and local requirements including Policy 16 – Built Environment and Design of the Core Strategy, Policy 12 Infrastructure and Policies 17-19, Sustainable Construction, Energy and Travel. These matters are considered in the following sections of this report.

Sustainable Development

In terms of location the site benefits from direct proximity to the railway station and bus services which operate along Shaftesbury Avenue and Goring Road (See Traffic Impact and Sustainable Transport section below). In accordance with current County Parking Guidance car charging points for electric vehicles would apply to at least 20% of parking spaces (this to be increased to 28% in accordance with annually increased standards) with cabling provided for others. Other sustainable Transport measures, including car club vehicles, which lend themselves to higher density developments such as the proposal, are described on the Highways, Accessibility and Parking section below.

In accordance with policies 17-19 of the Core Strategy the applicant proposes that development would incorporate the following sustainability principles:

- Highly efficient building fabric to reduce energy demand and carbon emissions;
- Water saving sanitary fittings and appliances to reduce consumption; and
- Efficient construction and operational waste management.
- Consideration of life cycle environmental impacts as part of materials selection.

Whilst some of these points fall outside planning control, such as the use of efficient building fabric, the following specific measures could be incorporated within the detailed designs, by their inclusion in the Design Code:

- Building orientation and layout to maximise internal daylighting, passive solar gain and natural ventilation
- Solar and photovoltaic (PV) systems
- Energy efficient gas boilers and domestic appliances (where installed)
- Air Source Heat Pump (ASHP) system for heating & cooling
- Combined Heat and Power (CHP) systems using low carbon fuels
- Balanced mechanical ventilation with heat recovery system (MVHR)

The last three of these are more suited to apartment blocks than to individual houses but it hoped that the concentration of these in a group of three or four buildings in the north-east corner of the site will facilitate their provision, particularly of the combined power system. It is noted that proximity of the railway station and railway may well necessitate the use of the MVHR system as part of noise mitigation measures, providing ventilation where open windows might otherwise be exposed to noise, subject to final comments of the Environmental Health officer. Comment

Other matters which may be covered in the Design Code but which are more likely to fall within the control of Building Regulations are the use of Building Energy Management Systems (BEMS) with smart meters and water-efficient fixtures with the aim of achieving water use of less than 105 litres/person/day. Air quality comments are awaited from the Environmental Health Officer but may include recommendations for the use of low NOx emitting domestic boilers and provision of air impact mitigation measures or possibly payment towards air quality mitigation off-site. An update will be given at the meeting.

Housing - Quantity and Mix

As the application proposes a maximum number of houses and apartments to a recently amended total of 287 dwellings, it is important to determine the extent to which this quantum of development can be accommodated satisfactorily on the site. In accordance with NPPF, it should be clear that the proposal can provide for both:

- the assessed size, type and tenure of housing needed for different groups, and
- high quality buildings, places, which is seen as a fundamental role of the planning and development process.

Proposed policy AOC5 identifies the site as part of a larger area of 6.8ha, including the nib land, for an indicative figure of 250 homes and 2500 sqm B1 employment space. Whilst the 0.8ha nib is not included in this application the housing figure proposed in the current application seeks to achieve a substantial housing provision on the remainder, which is greater than the indicative figure. If successful this could be beneficial in helping to meet the well-established need for housing.

In terms of housing needs the Council's recent Strategic Housing Market Assessment, 2020 (SHMA) examines the mix of housing sizes and tenures required. It identifies that for affordable homes the greatest concentration (around 75%) is for one and two bedroom homes. For market housing the need is concentrated around two and three bedroom homes (also around 75%+), and there is a far lower requirement for one bedroom homes.

The applicant is clear that the size / mix of dwellings is intended as a reserved matter rather than one to be determined at the outline stage. However, mindful of the need to demonstrate site capacity at this outline stage and the ability to meet the size and type of dwellings, the *illustrative* plans along with transport information; contemplate two optional layouts with a range of dwelling sizes. Options A & B are shown below and the numbers and indicative mix are summarised in Table 1, (this

is in need of slight revision due to a recent reduction in the maximum number of dwellings from 291 to 287).



Option A (above)

In Option A the grid like layout is based on a main road loop with cul-de-sacs to the north and south. Houses are largely 2-3 bedrooms with larger 4 bed L-shaped homes on street corners. Each house has at least one parking space, some have two; roadside spaces are shared. All houses are maximum 3 storeys. Four apartment blocks in the north east provide 9483sqm of net habitable space (measured from plan), once bin & cycle stores, cores and corridors are deducted. These range from 4 -7 storeys with 2 & 3 storey 'shoulder' wings. The U-shaped 68 bed care home occupies 0.49ha in the south-east corner alongside the entrance, this leaves 5.19ha for houses, apartments and roads and 0.32ha central open space. The Option A layout illustrates 291 homes but it has been agreed very recently that this number is to be amended to 287 and an amended illustrative plan is due to be submitted.



Option B (above)

In Option B the layout is very similar to Option A but one of the four apartment blocks has been removed leaving 6528sqm net habitable apartment space and it is replaced by 10 houses. Seven of these additional houses are indicated as 2-bedrooms. The sizes of the apartments are unknown in Option B but Options B (1) & B (2) in the officer-prepared table below consider scenarios in which they are assumed to be either all 1-bed or all 2-bed. The Option B (1) 1-bed scenario provides the higher overall number of 271 dwellings but is still 19 dwellings less than the total in Option A.

Table 1 (below) shows the overall housing numbers for Options A & B, with Option A prior to the anticipated amendment, achieving 290 dwellings whilst Option B provides between 234 – 271 dwellings, dependent upon the mix of one and two bedroom apartments used. The applicant has recently indicated that approximately 255 would be the probable lower figure.

The bottom rows of the table also contain average needs for dwelling sizes taken from the Council's SHMA. By comparison with these needs there are sufficient homes of each size to meet affordable housing needs. However, in terms of market housing it provides for well-above the proportion of one and two bedroom homes needed, whilst providing less than half of the needed three and four bedroom homes.

Table 1: Options A & B: Summary of dwelling numbers and indicative sizes

	1 bed	2	3	4	Total
Houses					
Option A	0	68	51	13	132
Option B	0	75	53	14	142
Apartments					
Option A	74	84			
Option B (1)*	129	0			
Option B (2)*	0	92			
Total Houses & Apartments					
Option A	74 (26%)	152 (52%)	51 (18%)	13 (4%)	290
Option B (1)*	129 (47%)	75 (28%)	53 (20%)	14 (5%)	271
Option B (2)*	0 (0%)	167 (73%)	53 (23%)	14 (5%)	234
Needs					
Market	10%	42.5%	37.5%	15%	
Affordable	35%	40%	20%	5%	

**Option B (1) assumes all apartments are 1 bed, Option B (2) assumes all are 2 bed*

In the case of Option B the extremities of the 1 & 2 bed ranges shown in Options B(1) & B(2) are used to demonstrate capacity i.e. the total number of 234-271 homes which are achievable under Option B. Neither extreme is desirable in reality as both cause over-supply of one or two bed homes respectively, particularly in the market sector. The applicant's recent suggestion of 255 represents a mid-point.

Whilst a mix which increases the amount of three or four bedroom homes while reducing the two bedroom number and simultaneously not over-relying on one bedroom apartments, would be likely to achieve an improved relationship with the SHMA needs, the location of the site close to public transport and services suggests that a higher concentration of smaller homes could be accepted here and may be necessary in order to meet the maximum number sought by the application..

Care Home and 'Retirement' Apartments

The proposed 68-bed care home is supported by the SHMA's estimated need for 435 additional care bed spaces in the Borough up to 2036 and this is considered acceptable in principle. The indicative images suggest a 2-3 storey building along with a rear car parking for up to 28 spaces.

In respect of the proposed 158no. apartments the application states that these may *come forward as residential or retirement accommodation*. The SHMA identifies a significant future need for retirement living. This amounts to 907 homes, including

accommodation with communal and warden facilities for people over 65. This need is somewhat greater in the market sector (56%) than in the affordable sector (44%). It is noted that if all of the proposed 158 apartments were used in this way it would provide 17% of the Borough's future need.

It is questionable whether such a concentration would be desirable in terms of overall development mix at the site. Furthermore, its proximity to railway station and local services, whilst beneficial in amenity terms, is also quite a bustling environment which may not be conducive to such a high proportion of retirement living.

The applicant is not considering specific provisions for retirement living, such as warden and communal facilities, and with reference to the indicative apartment plans, it is noted that elements such as communal laundries, day-rooms and warden accommodation or office would probably reduce achievable apartment numbers albeit probably to a fairly limited extent. However the applicant wishes to include the option for retirement living although not restricted as such at this outline stage. The question of whether unrestricted occupation of the apartments makes a difference in terms of car parking space requirements is considered in the Highways, Accessibility and Parking section, below.

The SHMA also identifies a need for 300 wheelchair user dwellings in the Borough and that (based on national trends) this need is greater for social rented housing at around 7 percent, with a lower proportion of 2.3 percent for market housing. The development, which is likely to include numerous ground floor apartments, could make provision according to these proportions. Subject to confirmation with the applicant, a planning condition could be used.

Affordable Housing

In accordance with Core Strategy Policy 10, thirty percent of dwellings should be provided as affordable housing comprising a suitable tenure mix, which is typically around 70% rented and 30% intermediate/shared-ownership. The location of the site close to public transport and local services lends itself to full policy provision subject to an assessment of scheme viability.

The applicant has submitted a viability assessment with the application asserting that there is insufficient development value to support full provision. This has been peer-reviewed by the Council's Consultants and focuses mainly on the following:

Site Value ('Benchmark Land Value') also Residual Value after development: Assumptions as to existing value are based on rents which might be achieved from a continued office use, assuming that at least half of the premises could be re-let, also the alternative value which could be achieved if the permitted development change to residential use were implemented, but no costs have been provided for the theoretical conversion works. The following factors also inform residual value -

Sale Value of Proposed Development: A significant area of variation is in the value of apartments if sold for retirement living, which may generate up to 15%

more value than other tenures. It is uncertain whether or how many of the apartments would be for retired occupiers;

Ground Rents: Apartments may generate an annual ground rent of up to £350/apartment. However, potential legislative change affecting freeholds may significantly reduce this and lessen site value;

Abnormal costs: These focus on current unknowns regarding the potential need for remediation of land currently covered by buildings and costs thereof, which may include asbestos in existing buildings; demolition costs could vary accordingly. Construction of the main access road is also cited, although it is unclear why this is considered abnormal.

A copy of the Council's latest peer review is attached as **Appendix 1**.

Following a review of the viability assessment it is apparent that land valuations vary significantly between £2.2m – £3m. The range of variables produces estimated surpluses of between £891,509 and £2,031,802. The Council's Consultant advises:

"The significant variation in appraisal results above supports our continued view that it is too early a stage to fix policy concessions, particularly if nil affordable housing is to be agreed – and perhaps even as a baseline subject to later review. The type/tenure of the apartments is not fixed and may have implications for very different values and build costs, and therefore viability, depending what is decided. At the very least there should be some form of review mechanism to ensure that whichever scenario comes forward in practice makes the appropriate planning contributions...as a minimum in our view there should be a review, if not a low level of AH agreed in conjunction with a suitable review approach."

In response the applicant acknowledges that one potential outcome is that values might not support any affordable housing provision or that well performing sales might produce a degree of surplus. Until the site has been sold and a developer has confirmed the mix of uses (care home and retirement apartments) the value of the site cannot be fully established. However, in order to seek a consent the applicant indicates that they would commit to a minimum 7% affordable homes (with rented/shared ownership mix to accord with the Council's requirements). In addition, the applicant has agreed to an early viability review (at the reserved matters stage) where greater certainty about the future mix and tenure of development would be clear.

The commitment to a minimum 7% provision would be guaranteed despite the applicants view that the degree of potential profit indicated by the Councils Consultant is overly optimistic (10% above their sales values). The applicant also stresses that this affordable housing offer reflects the recent reduction in units from the original proposed maximum of 296 to 287 and that a higher offer could have been made had the scheme density not been reduced further.

The level of affordable housing is disappointing but reflects the high degree of contamination on the site. It is also important to note that the value of the site is 'artificially' increased due to the permitted development rights that exist whereby the

existing buildings can be converted to residential without permission and without delivering any affordable housing. The viability review at the reserved matters stage will provide some comfort that the maximum level of affordable housing can be secured.

The applicant has also committed to pursue Homes England funding to ensure that a policy compliant 30% affordable can be delivered. Members will recall that Homes England had committed public funding to ensure the delivery of on-site affordable housing at Teville Gate but this was only secured on the basis that a Registered Provider was identified and able to use affordable housing grant. Your Officers have discussed the viability issues on this site with Homes England and there is scope for additional grant funding later in the year to assist the delivery of additional affordable housing on the site.

Layout, Scale & Density

Apartments

In the indicative layouts the apartment blocks are clustered towards the north-east corner of the site and their individual locations form part of a 'Building Extents' parameter plan. Their heights are subject of a height parameter plan.



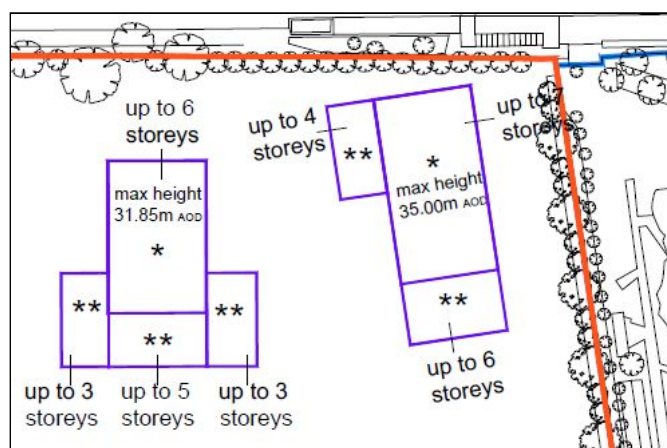
In both Options A and B a pair of four-storey blocks of approximately 37m length and 17m width are shown in the eastern mid-section of the site. They would face one another in a parallel arrangement across an intervening space of approximately 28m. One of these also faces westward onto a public open space the other also faces eastward towards the main site access road and boundary with the five storey Durrington Bridge House and car park.

In terms of height their position well into the interior of the site, the proximity to Durrington Bridge House and separation from the 2-storey houses to the south of Barrington Road and bungalows, provides opportunity for this medium height. In terms of their relationship to one another, the intervening 28m distance is reasonable in terms of privacy between opposing apartments.

There is some concern that a uniform height along the entire 37m face of each building may appear monotonous and perhaps too massive. In the reserved matter detailing the introduction of shoulders, particularly at the ends of the buildings, may be necessary in order to avoid corners which are too sheer or stark. Architectural interest at the building ends will also be important and perhaps a re-planning of the footprint to change the ratio between the narrow ends and wide lengths. It may also assist in the penetration of daylight into the areas between the buildings and windows. Amendment of the parameter plans is recommended to reflect this.

On a further matter, the layout indicates less communal space than is sought by the Council's Space Standards SPD. This is considered further in the following paragraphs which refer to another pair of proposed apartments.

To the north of this pair, in Option A are two taller blocks. These are located in the north-easternmost corner. They are respectively 36m and 43m long and between 17m in width at their narrowest and 24m & 33m respectively at their widest.

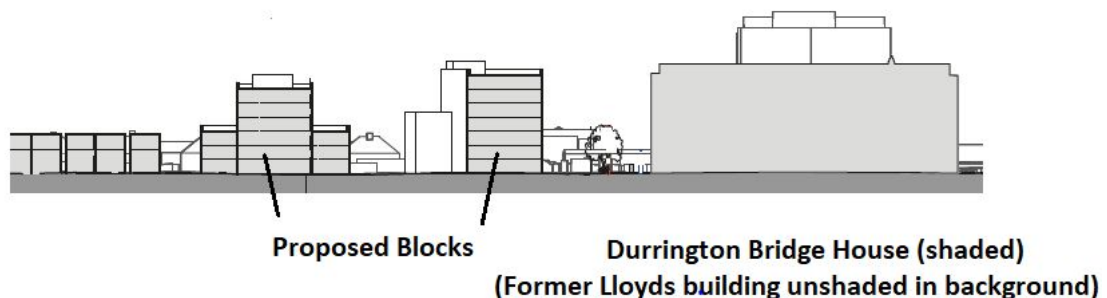


The images here show that these offset and although they are closer than 28m at their closest points, these areas would not contain windows other than obscure

glazed ones, also at the upper floors of their northern end elevations, such that intervening privacy and privacy of neighbours to the north of the railway line would be safeguarded. There is a remaining risk that numerous upper windows in the western side of the building would have a line of sight across proposed rear gardens of houses to the west. The achievement of adequate buffer planting here is important in order to filter these views and a deeper margin for tree planting, compared to that shown below would be desirable

The extract of the height parameter plan (above) shows that heights of these buildings would vary between three, four and five storeys at their shoulders and 6-storeys for western block and 7-storeys for the eastern block. These varied heights serve to create a sense of vertical tapering, which perhaps is more pronounced in the western block than in the eastern one.

The east-west cross-section below shows how these blocks relate in size to Durrington Bridge House to the east (shaded in grey). The more distant and taller former Lloyds building in the Causeway is shown unshaded in the background. The graded heights of the two proposed blocks and their shoulders alongside Durrington Bridge House create a cluster of tall buildings which are considered to integrate reasonably well with the wider existing townscape, subject to detailed design and materials at the reserved matters stage.



However, at closer quarters within the site there are reservations that the blocks may appear somewhat slab-like due their length, footprints and height, despite the use of lower shoulders. They are closer together and closer to boundaries than is desirable for buildings of these heights and could well appear cramped, contrary to the guidance in the Council's Tall Buildings SPD. The slab-effect is most pronounced in the case of the eastern block which would overbearing upon the adjoining footpath. Furthermore, the arrangement of blocks, access roads and parking leaves little communal outdoor space, as sought by the Council's Space Standards SPD.

It is noted that recent development of the Lloyds site in the Causeway 170m to the north, particularly the new-build courtyard element of 5-6 storeys, demonstrates that well designed buildings and settings can sometimes achieve a successful high density enclave in sustainable locations without fully meeting the open space requirements of the SPD.

Something of this approach could be adopted here, particularly as the north east corner is closest to fairly dense existing development focused on the railway station. A successful outcome would probably call for a different layout to the indicative one

The pair of apartments indicated to the south also under-provide communal space and have heavily parked frontages. The proximity of the proposed open space immediately to the west means that residents here would at least have good access to public space but a reduction in car parking here would also be desirable in order to create a pocket of communal semi-private space.

Houses

The illustrative housing layout in both Options A & B is based on a grid format which is defined in a proposed parameter plan. It includes a looped, main access road in the centre of the site to the north of which is a northern row of three cul-sacs. Inside the loop is a second pair of rows 'the central rows' comprise houses which face onto the northern, southern and western stretches of the loop road. To the south is a southern row of cul-de-sacs and the care home site. Each row is shown and assessed in turn, below.



Northern Row (above)

The northern row comprises predominantly two and three bedroom houses and occasionally four bedrooms at corners or street-ends. Typologies are detached and semi-detached in reasonable proportions and in staggered alignments to create design variety.

Distances between buildings are generally good, for example most have 21m or more between rears; 16m front to front and 14m front to flank. A planted buffer along the northern edge with the railway line allows for new tree planting to replace the leylandii hedge, which is overly tall for its new setting and would present future maintenance issues. The use of shared-surface roads without pavements or with partial pavements is acceptable for cul-de-sacs of these lengths and numbers of dwellings. It allows for planted frontages which reinforce their informal and intimate character.

Car parking is typically by a single driveway space for each house. A second in-curtilage space is provided occasionally, such as for 4-bedroom houses for instance those closest to the railway and those facing the central green (bottom right hand corner of image above); the last of these contain side garages or carports.

In order to provide an acceptable amount of car parking space to satisfy current County Parking Guidance, 2019, a series of roadside spaces are also proposed. In the western cul-de-sac these are lined-up in tandem and in parallel with the road edge in between individual driveways. In the middle cul-de-sac they are alongside a turning area and in the eastern cul de sac these are along the railway edge, beneath the existing tree line. On the loop road they are in lay-bys and a chevron cluster is also on the north side of the central open space. These spaces are all unallocated and would be available to residents and visitors.

Following advice from the Highway Authority houses on the east side are to be moved eastward to ensure sufficient road space, maneuvering space and workable car parking bays. A knock-on effect of this is the need to reduce a semi-detached pair of houses in the middle cul-de-sac to a single detached house. In design terms

the series houses at the southern end of the cul-de-sac would need to be dual fronted, in order to avoid blank road-facing frontages to the main access road.



Central Rows (above)

The central rows also comprise predominantly of two and three bedroom houses and modest terraces which combine to create strong, mixed building lines. The street is wider than the cul-de-sacs, and includes pavements which suits its status in the road hierarchy as a main access road and provides for its adoption by the Highway Authority (by contrast side streets and cul-de-sacs would be privately managed). Separation distances between building faces, rear and sides are all acceptable. Parking is typically one forecourt space per dwelling, with infrequent second in-curtilage spaces or garages. Roadside bays provide shared, unallocated spaces.

To the west the section of the looped road runs parallel with the tree-lined western boundary with roadside parking bays beneath the trees. In order to provide improved separation from the trees and workable parking & maneuvering space and a service margin, this western road section is to be moved further eastward. This change necessitates the loss of two houses from the central rows, which in turn also allows for some additional space to be added to the east-west runs of houses facing the main road.

At the south west corner the illustrative layout shows a proposed future link road into the nib land. The Highway Authority has recommended that this should be realigned to create a straighter line and T Junction with adequate visibility. This access will provide for additional future development to the west. A legal agreement can ensure its provision and retention for this purpose.



Southern Row (above)

The southern row comprises two cul de sacs and the U-shaped care home to the east. It also contains a short extension to the western part of Barrington Road in the bottom south west corner, which would serve a few new dwellings and provide an alternative access for emergency vehicles only. Along the southern boundary is the existing narrow footpath used by the public within a wide grass margin. To the north of the path is the tall, mature hedgerow.

The illustrative layout shows a similar mix of semi-detached and detached houses as in the northern row but contains a greater proportion of three bedroom houses, including several with garages facing the central open space towards the east. Layouts tend to use straighter building lines, which in some cases are repetitive with narrow intervening spaces between buildings. There is also a steeply staggered cluster in the western cul-de-sac which it is recommended should be less pronounced. The parking arrangement is similar to the other rows, including tandem roadside rows in between driveways. A rear parking court is also shown between the two cul-de-sacs.

The houses facing onto the southern boundary and hedgerow are set along a parallel road which would link the ends of the two cul-de-sac and thereby avoid the need for turning heads. The Highway authority has requested information to demonstrate that this is sufficient for service and emergency vehicles and information has also been requested to demonstrate that there is space to retain and manage the hedgerow.

As with the northern row, additional manoeuvring space is needed in the cul-de-sacs to ensure sufficient road space and workable car parking bays. Two houses in the section between the two cul-de sacs would be removed to allow for this and to deepen the car-parking court for increased manoeuvring space and to provide a direct pedestrian path for the southern houses. A linking public path would also be created through the hedgerow into the eastern cul-de-sac.

Care Home

The proposed 2-3 storey care home at the east of the southern row is set within reasonably spacious grounds with a central communal garden fronting the main access road. Its rear parking area is set within landscaped margins, although a detailed layout should include a buffer to the rear gardens of the adjoining cul-de-sac and avoid fences along main frontages in favour of rails or railings with planting.

Parking Provision

Provision of parking space in housing areas poses some issues, in particular the extensive use of driveway parking proposed on front gardens could create repetitive, car-dominated street scenes. This could be intensified if future residents then add a second parking space at the expense of vegetation. Some of the tandem roadside rows have a similar negative effect.

Two suggestions which would assist are a wider use of garages or carports to the side of houses and secondly a departure from repetitive use of front gardens to a more mixed approach of grouped frontage spaces with intervening hard and soft landscaping including some 'apron' gardens, as illustrated below from the recent 6th form college redevelopment site in Bolsover Road, nearby. These spaces would be a mixture of allocated and unallocated spaces.

The latter suggestion is unlikely to affect housing numbers but it may only be suitable for unadopted cul-de-sacs rather than the adoptable main access roads. The use of garages, which require wider plots will require greater land take and therefore could affect overall numbers.



Frontage parking arrangements at Bolsover Road site.

Open Space

The proposal includes 0.323ha of public open space, which is located in a central area of the grid, fixed by the public realm parameter plan. Its central position gives good access to both the housing and apartment areas. It also provides a focal point to the site and a foil to the illustrative buildings which face onto it, one of which is a four storey block, the others may be up to three storeys.

In terms of quantum, the recently reduced number of dwellings gives a ratio of 11.25sqm/dwelling, which is slightly greater than the 11.13sqm/dwelling in the

recently completed former 6th Form College site in Bolsover Road, where open space is also provided as a central square, similar to that proposed here.

Its overall dimensions allow for informal recreation, exercise and play. A modest area of children's play equipment is illustrated, details of which are to be informed by the Parks & Open Space officer in comments which are to follow current discussions. It is recognised that the space cannot provide for all recreation needs generated by the development, for instance formal play for older children and teenagers. In accordance with policy x it is anticipated that a contribution towards off-site facilities will be required, which would be secured by legal agreement. An update will be given.

Density

In consideration of the size of the site, and making deductions for the open space area and care home, the net developable area for the houses and apartments is 5.19ha. The range of dwelling numbers proposed, 287 maximum and the applicant's suggested 255 lower figure give respective densities of 55.3 and 49.1 dwellings/ha.

For comparison, the former 6th Form College site equates to 50 dwellings/ha and the emerging policy AOC indicative figure of 250 dwellings (excluding approximately 0.8ha from the 6.8ha emerging Local Plan site to account for some B class development), would produce around 42 dwellings/ha. Accordingly, both the proposed upper and lower figures in the current application, would provide more homes than the emerging plan.

The lower figure is close to that of the former 6th Form College development, which has achieved a good balance of houses, flats, space and urban design on site of similar shape. Accordingly there is confidence that something similar could be achieved on the current application site.

The higher figure tests out the extent to which a 10% greater density can also produce a good balance of these elements. The use of apartments to achieve pockets of higher density is an important element in this, together with concessions on the amount of communal space to be provided and a more progressive use of sustainable transport measures, such as car clubs, which builds on the intrinsically sustainable location, close to transport links and services.

Summary

In summary the layout of housing streets is generally quite good with a mix of housing and street typographies based on a road hierarchy of main access roads and cul-de-sacs. It is noted that the parameter plans suggest that all housing would be up to three storeys. In urban design terms a more selective approach is needed in order to focus these heights on most spacious areas such as facing onto the central open space and perhaps corners, thus creating a more distinctive series of places and avoiding the creation of cramped street frontages elsewhere; also avoiding excessive overlooking (taller buildings would usually need longer rear gardens). Two and two-and-a-half storeys should be more typical.

Furthermore in some areas there is need for increased space within built-up frontages, such as in the long central rows of houses and in some cul-de-sacs. It is anticipated that this will be aided by the selective removal and swapping of plots as part of the manoeuvring-space / tree-space related changes previously described. It is noted that changes to the southern row may reduce the depth of some gardens, but it is hoped that this will increase their width. Information regarding the linking road at the southern boundary is needed to demonstrate adequate access and space to retain the hedgerow. The overall effect of any changes on house numbers will become clear in the amended plans

More generally, information is also needed to demonstrate that roadside trees can be accommodated, which currently appear very constrained at the edges of pavements, driveways and gardens and vulnerable to damage from manoeuvring cars. The use of the Bolsover Road approach, which clearly defines and protects planting space could also assist in this.

In respect of the proposed apartments, their staged/stepped heights are likely to be acceptable in relation to the existing wider townscape. Subject to careful location of windows and obscure glass and space for a tree buffer they are capable of providing reasonable privacy between residents, proposed and existing.

At closer quarters, there are concerns that they would appear cramped and potentially slab-like, particularly the north-eastern block close to the site boundaries and Durrington Bridge House. A more spacious arrangement using a more varied footprint in combination with the proposed stepping would assist. Option B offers an easier solution by removing the north-western block but it might also be possible that a different approach to the footprints of the pair in Option A could provide a workable solution, together with the removal of the Class A retail space and its associated ten parking spaces.

The aforementioned former Lloyds site new-build apartments serve as an example of localised high density enclave design which works with limited communal space. Such an approach would differ from the fixed footprints of the parameter plans and it is therefore recommended that this be replaced by a more flexible parameter which identifies all four apartments as an apartment block area, for instance including the following factors:

- i. Up to four blocks
- ii. Maximum heights to not exceed current height parameters and include shoulders to give stepped profiles
- iii. Intervening distances, especially windows should be no closer than 21m up to the first floor, 28m up to fifth floor and increased distance above this.
- iv. Qualitative descriptions of communal open space, to require a greater proportion of communal space for at least two blocks, with a lesser expectation for the remainder
- v. Inclusion of planted buffers with trees and landscaping.

This more flexible approach includes provision that 2 storey elements could be closer together than the 28m currently shown. The removal of ten parking spaces

will provide a degree more usable or landscaped space but it is noted that parking spaces, if provided at the ratio of 0.8 spaces per dwelling will affect the number of achievable units and may require further sustainable transport measures. This is considered further in the Highways, Accessibility and Parking section, below.

Residential amenities

Whilst the proposal is in outline form, the illustrative plans demonstrate the proposed dwellings could meet national internal space standards. In terms of external amenity space, outlook and privacy, the illustrative plans also indicate that the proposed houses could achieve adequate separation distances and amounts of private garden space. They also show that development could achieve adequate separation distances to neighbouring properties beyond the boundaries of the site to safeguard neighbouring privacy.

As already mentioned, the illustrative separation between apartment blocks indicates that sufficient privacy distances could be observed by use of staged/steped designs and deployment of windows, including some obscure-glazed. It is probable that at least some of the blocks would have less communal space than is sought by the Council's SPD but dependent on the design quality of a final development it is possible that this could still provide a reasonable quality of development, as demonstrated at the former Lloyds enclave nearby illustrates. Features such as spacious balconies, perhaps enclosed 'winter-garden' type balconies, nearest to the railway, may all contribute to the provision of a satisfactory level of external amenity space to meet the needs of future occupiers.

Sunlight and Daylight

A sunlight and daylight assessment submitted with the application has considered potential impacts on the nearest properties in Chesterfield Road and Durston House to the north, Barrington Road to the south and the northern ends of the southern streets at Wellesley and Walpole Avenues, Elgin Road and Rosebery Avenue. It concludes that, overall, the proposal would have a limited impact. Minor harm is identified to one window (1 of 5 windows) at 32 Elgin Road and 2 secondary flank windows (2 of 8 windows) at 66 Barrington Road.

Taking into account the application is outline form; it is considered that the harm identified could be mitigated at the detailed design stage through a careful layout and a final design test of building heights close to the identified dwellings.

In terms of the effect between proposed buildings within the site, careful consideration would be needed at the detailed design stage for new houses close to the boundaries of the site where significant trees are either retained or proposed. This would be particularly important at the north west corner near the large boundary trees, to ensure sufficient distance, and possibly initial pruning, to reduce risks of subsequent pressure to reduce or fell important trees due to overshadowing.

The relationship of the apartment blocks in the north east corner to one another and to the new houses would also need to be tested at the detailed stage to ensure that new flats and houses are not unduly overshadowed by one another.

Noise and Vibration

In light of the proximity to the railway line & station and Durrington Bridge House a noise and vibration assessment has been submitted. This indicates that dwellings along the north of the site, near the railway line would require a combination of acoustic double glazing and acoustically-attenuated ventilation. In other places a lesser level of noise mitigation would be needed. Facades facing into the centre of the site, and away from the roads and railway line may be able to achieve internal noise limits with windows open, or limited open windows whilst others would achieve this with windows closed using passive ventilation, such as trickle vents. The survey goes on to say that 'tactile vibration and re-radiated noise would not raise any significant impacts.

In response the Environmental Officer has requested further information, in particular regarding railway and station noise and any mechanical plant at Durrington Bridge House and the extent to which different levels of mitigation would be needed across the site. An update will be given.

Given that the application is in outline, a flexible approach to the future layout and orientation of buildings will allow for detailed design to further-explore the way in which buildings can provide noise shading and concentrate windows away from these sources and provide noise-shelter for others, including other mitigations including acoustic glazing and types of ventilation.

During the development process a construction environmental management plan (CEMP) is recommended by the Environmental Health officer, along with control of working hours to regulate and guide construction work and the control of impacts including noise, dust and fumes, external lighting, amongst other measures. These could be required by planning condition.

Highways, Accessibility and Parking

Site Accesses

In this outline application access into the site is the only detailed layout matter to be determined. In this case it comprises a reconstructed and narrowed T-junction access to replace the existing wide, gated access at the eastern part of Barrington Road (below). This includes extending existing yellow lines along the southern side of Barrington Road beside no 43 Rosebery Avenue and into the western head of the cul de sac. Tactile paving will assist in pedestrian safety.

The existing pathway at the eastern boundary which leads to the southern gate and platform of Durrington Station would be increased in width to 2m and integrated with the reconstructed junction and the chain link fencing in front (west) of it would be removed, with a new planted buffer behind (east). Future public use of the path would be secured by legal agreement.



Proposed Access at Barrington Road (east)

At the western end of the cul-de-sac the existing narrow tarmac pathway would be widened to a 3m or 3.5m wide shared pedestrian and cycle path. Details of barriers to restrict unauthorised use, for instance by motorcycles, and for suitable lighting would be for approval in consultation with the Highway Authority by planning condition.

At the western side of Barrington Road, the provision of vehicular access to the south western corner of the site (as shown below), is limited to the first two houses of the proposed development. The roadway to the east of the proposed house no.3 below, would be restricted to use by emergency vehicles only. A bollard is shown to provide this restriction but the final detail would also be required for approval in consultation with the Highway Authority by planning condition.

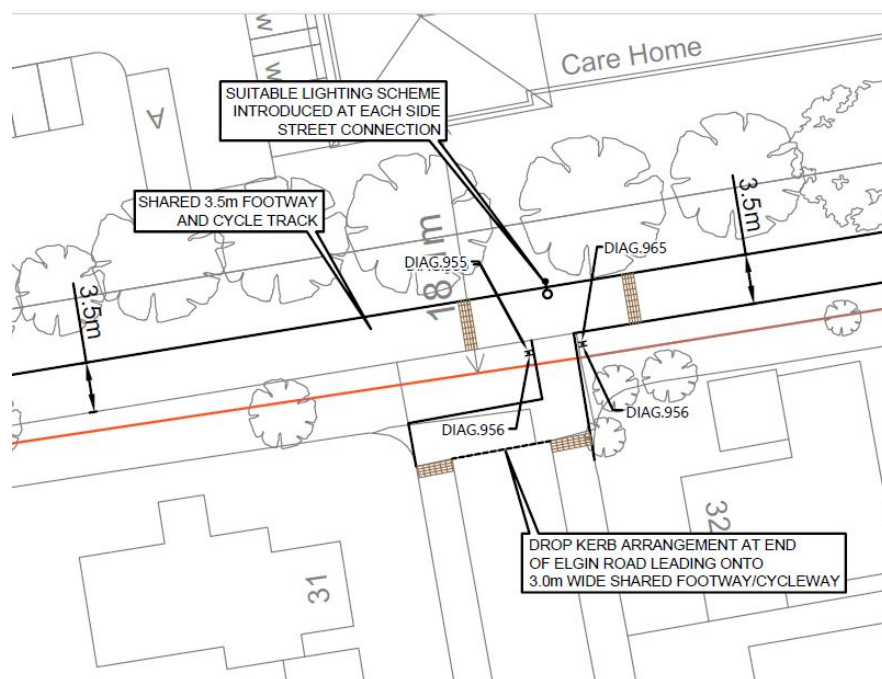
A turning area adjoining the eastern boundary of no 66 Barrington Road, would provide for vehicle turning, subject to its adoption as a public highway. Also shown is the western end of the proposed pedestrian and cycle path, with a barrier also to be approved by planning condition.



Proposed Access at Barrington Road (west)

The image below shows how pedestrian and cycle connections would be made between existing cul-de-sacs to the south (Wellesley Avenue, Walpole Avenue and Elgin Road) and the proposed improved southern foot-cycle path; the layout shown is handed in the case of Wellesley and Walpole Avenues. A proposed connecting path through the hedgerow at the northern boundary is also proposed

This involves the creation of a connecting path in each case across unmade and in some cases, slightly banked-up ground. Removal of part of a line of conifer trees would be necessary at Walpole Avenue. The comments of the Highway Authority on these proposed connections are awaited, including comment as to whether barriers are needed here. An update will be given.



Footpath & cyclepath connections to existing southern streets

The new and improved pathways would be secured through legal agreement and would include new signage. It is anticipated that the southern path would be adopted by the Highway Authority. Clarification has been sought as to whether some or the entire footpath along the eastern boundary would also be adopted.

Internal Roads

The illustrative internal road hierarchy comprises the looped, main access road and narrower side streets/cul-de-sacs. The main road proceeds from the eastern entrance along the eastern side of the care home site then turns westward to form an east-west loop through the proposed development. The road is 5.5m wide with pavements on each side. There are pockets of roadside parking bays containing clusters of unallocated spaces. At the central open space two arrays of unallocated chevron parking bays adjoin the road edge. This road is intended to be adopted and conformation is awaited from the Highway Authority that the amended illustrative plan would meet design requirements for adoption.

The layout has been tested to ensure that there is space for access by service and emergency vehicle. The Council's waste management officer has observed that accessibility relies on there being no on-street parking along this road or inside roads other than in roadside bays. In response, the applicant's Transport Statement states that traffic management controls such as single and double yellow line restrictions, could be included to discourage on-street parking, including risk of parking by commuters using the nearby railway station.

The details of parking controls and their extent would be determined at the reserved matters stage. In anticipation that the main access road could be adopted but not the side streets/cul-de-sacs, parking controls on main access road could be statutorily enforced, although the Highway Authority's comments indicate that this would probably need to apply at the point that the site is occupied rather than retrospectively later on. Those on side roads/cul-de-sacs would require private management, which would be secured by a planning legal agreement.

The series of side narrower roads and cul-de-sacs which lead from the main road are typically 4.8m wide and are typically shared-surface streets without pavements or with only partial pavements. Parallel roadside parking bays at the roadside would fit between individual house driveways or beneath trees at the street edges. For apartments the parking bays would be in long groups at right-angles to these roads.

The Highway Authority has observed that where service margins are not proposed to these side streets, access to services would involve digging up the streets and seeks confirmation that this could operate practically, allowing space for access and manoeuvring. The Authority has also requested that the part of the access road which leads up to the western boundary of the nib land be straightened and a T junction formed. The applicant's amended plan is to include this.

In addition, for the illustrative southern loop between two cul-de-sacs, a demonstration is requested to show that this could operate successfully for access and manoeuvring. As explained in the Tree section of this report below, the relationship of this road on the important southern hedgerow is also being checked

to ensure there is adequate space for its retention and maintenance, which may require some adjustment to the illustrative layout.

Parking

A total of 351 parking spaces are proposed to serve the maximum number of dwellings shown in Option A. This comprises 309 spaces for use by residents and 42 other spaces for visitors.

These 309 resident spaces are derived by using the recent West Sussex Parking Guidance, 2019 which divides the town into a series of parking behaviour zones (PBZs) where differing ratios of parking demand apply. Within the PBZs demand also varies according to dwelling sizes. A percentage reduction of up to 10% can then be applied as an adjustment to reflect the effect of sustainable transport measures. Numbers may also be varied according to whether spaces are allocated to individual homes or unallocated; a greater number of visitor spaces are required where more than 50% of spaces are allocated.

The table below explains how the proposed 309 spaces are derived using the numbers of dwellings and the PBZ parking demand ratios for this area, to which a 10% sustainable transport reduction is applied. The use of unallocated spaces for the apartments has allowed the number of proposed spaces (131) to be reduced below the demand figure (141)

Table 2: Residential Parking (not including Care Home)

OPTION A	Dwelling numbers	Parking Demand (PBZ)	10% Sustainable Reduction	Demand	Proposed Spaces
2 Bed House	65	1.167	1.05	68	70
3 Bed House	51	1.700	1.53	78	78
4 Bed House	13	2.300	2.07	27	28
Sub Total	129			173	176
1 Bed Flat	74	0.800	0.72	141	133
2 Bed Flat	84	1.167	1.05		
Total	287			314	309
Visitors				26	42

The dispersal of these parking spaces is shown in **Appendix 2** to this report. It shows that the unallocated spaces for apartments are grouped close to the proposed apartment blocks, where they are easily accessed by residents. These 133 spaces equate to 0.84 spaces per flat and according to current Guidelines, no separate visitor spaces are needed given the high degree of unallocation. The Highway Authority has indicated that this quantity and proximity of spaces could be accepted in association with sustainable transport measures, which includes two of the three proposed car-club vehicles located within the rank of parking spaces alongside the blocks

For houses, the illustrative plan shows that each house has at least one space within its curtilage. Around 33% have a second in-curtilage space. The total of

in-curtilage spaces meets the overall number required by the adjusted PBZ parking ratio.

Whilst this approach meets the numeric parking requirement, it is noted that in terms of dispersal the illustrative approach would leave many two and three bedroom houses without access to space for a second car. Arguably, where parking ratios are met by a high degree of allocation, there is a need for a counter-balancing pool of unallocated spaces to reflect the expectation in the PBZ ratios of second car ownership. In recognition of this the applicant proposes a greater number of visitor spaces than would normally be required i.e. 42no at a rate of 0.33/house instead of 26 spaces at 0.2/house. These unallocated spaces would be available to residents as well as visitors.

These illustrative visitor/resident spaces are provided in the unallocated roadside bays and rear parking court. Their dispersal is intended to allow households or their visitors to park close by. Appendix 2, which is due to be updated, shows how 10 clusters of houses could have unallocated spaces (shown in green) within them.

Pending updating of this plan, a sample of six of these clusters (A, C, D, F, G & J) comprising 78 houses shows a wide range of visitor provision. In the case of cluster F, alongside the central open space, all houses have a second in-curtilage space and therefore the five unallocated bays would be entirely available to visitors. In four of the other clusters there is space for a second car or visitor on an approximate ratio of 1 per two or three houses, for cluster A it is one per five houses. A car club vehicle would be included within the illustrative housing area in addition to the two beside the apartments and all three would be available to all residents.

From the assessment it appears that sufficient car parking space can be provided in terms of number but that the way in which they are dispersed, if bound by the illustrative layout and the current underpinning grid-format of the parameter plans, could lead to an unequal distribution.

A solution would be the use of an amended parameter plan which does not fix the grid as currently illustrated but allows for this to be a matter of detailed design at the reserved matters stage. Guidance notes regarding the use of car parking ratios can be accompany the parameter plan together with a description of the effects of allocating or not allocating spaces to individual dwellings. One potential outcome is that parking numbers might be lower in the detailed design, although this may well also depend upon increasing sustainable transport components, such as the number of car club vehicles.

Traffic Impact and Sustainable Transport

The applicant's traffic modelling suggests that the existing site has capacity to generate 398 and 380 vehicle movements in the morning and evening peaks respectively. These are mostly (around 90%) in-bound in the morning and out-bound in the evening. This assumes that the site is fully occupied, which it is said was most recently the case in January 2015 when decanting of HMRC services began; it is unclear whether this assumes a uniform occupancy rate for all space, which included significant areas of archives, printing and ancillary staff facilities

such as the refectory. It also assumes that 40% of employees used non-car transport.

By comparison, modelling of the proposed dwellings and care home indicates 162 and 152 vehicle movements in the morning and evening peaks respectively. These are mostly out-bound in the morning (79%) and in-bound (68%) in the evening. This represents a substantial reduction in in-bound trips (90%) and an increase of 92 out-bound vehicles (72%) in the morning peak, which tends to be a more concentrated peak, for instance including school-runs, than in the evening.

The Highway Authority has advised that in response to this modelling, improved road markings are needed at the junction of Barrington Road with Shaftesbury Avenue, in order to facilitate right hand turn movements. This can be secured under s.106 agreement. Sustainable transport initiatives are also important not only due to this change in impact but also in response to current planning policies, County Parking Guidance (the 10% adjustment already described), and the Council's climate change emergency declaration, 2019.

Given its location adjoining the railway station, the site is extremely well located for access to trains serving the wider town, the coast and London. Frequent bus services including The Pulse and 700 routes operating along Shaftesbury Avenue and Goring Road also provide for journeys into town, other retail destinations such as West Durrington and the wider coast. The adjoining network of wide side streets provide relatively safe cycling and walking routes, which connect to the A259 dedicated cycle paths on the busier Goring Road. The proposal includes a new shared cycle-footpath along the southern boundary, in place of the narrow poorly surfaced and unlit path.

Further elements of sustainable transport in the current proposal are:

- Car club: the provision of at least three car club vehicles and a period of up to 3 years paid membership and drive time for residents
- Improved waiting facilities for two nearby bus stops including real time information (and bus shelters, pending advice from Council Engineers).
- Cycle parking – 0.5 spaces per apartment, 1 space for 2-bedroom houses, 2 spaces for larger homes.
- A residential travel plan to include:
 - Welcome pack with timetables and route maps for public transport, particularly buses;
 - Contact numbers and web details for the TfL Journey Planner and National Rail Enquiries;
 - Local taxi company details;
 - Car Club information;
 - Car Sharing information including links to local websites / providers; and,
 - Cycling and walking maps for the local area.

Collectively these measures have potential to make good use of the opportunities presented by this sustainable location. Discussions are underway as to additional provisions for cycles for apartments and other measures which might be added to the travel plan to increase public transport incentives. The various sustainable transport measures would be secured by legal agreement.

Heritage

Designated and Non-designated Heritage Assets

The site does not contain any designated heritage assets. However, there are a number of heritage assets which fall within 500m including, amongst others, the Shaftesbury Avenue Conservation Area 100m to the south east, The Grade II Listed Field Place on The Boulevard 350m to the north-east, The Grade II Listed Thatched Cottage on Goring Road 440m to the south-west and Local Interest Buildings at the Goring Reformed United Church located on the adjacent site approx. 80m to the east and 22 Shaftesbury Avenue 170m to the south-east.

Whilst the proposal is in outline form, taking into account the screening provided by the existing surrounding built form and townscape the site is capable of accommodating a form of development that would preserve the overall setting of surrounding heritage assets. This is subject to control of the overall height of development as proposed and the use of high quality designs and the reserved matters stage.

In the case of the mid C20th Goring Reformed United Church located to the east, whilst this is not listed, it is distinctive and it is recognised there would be an opportunity to enhance the backdrop against which it is seen by replacement of the existing 3-5 storey concrete and glass buildings on the site.

In summary, the proposal would preserve the setting of the nearby heritage assets and there is no overriding constraint to the development as a result of archaeology. The proposal therefore has proper regard to the requirements of Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and would accord with the provisions of Core Strategy Policy 16 and the NPPF in terms of conserving the historic environment, including archaeology, as follows.

Archaeology

It is believed that the site has been occupied from the Neolithic period onwards although in the early 20th century most of the site was a brick earth quarry which is likely to have removed all Paleolithic archaeological deposits before redevelopment in the 1940s, 50s and 60s.

The County Archaeologist has advised that, subject to further archaeological investigations being secured via planning condition to help understand the site's archaeological value further, the impact on features of potential remaining archaeological significance would be adequately mitigated.

Trees & Landscaping

The application is supported by an Arboricultural report, survey and tree protection plan. This indicates 81 individual trees, five groups and 13 hedgerows in and around the boundaries of the site. A total of 41 individual trees one group and seven hedgerows would require removal in order to facilitate development. A further 24

individual trees and one group, attributed low category status are recommended for removal for health and safety reasons.

The report describes the retention of the majority of the hedgerow along Barrington Road, adjacent to the existing footpath which would become a pedestrian/cycle path and is of good amenity value. Other significant tree-lines along the western boundary (including established Holm Oaks) and the northern boundary (established Conifer hedge) are indicated to largely be retained but with new features such as on-street car parking/roadways and housing plots located adjacent to them in the illustrative plans.

New tree planting is proposed in the illustrative public open space and along the eastern boundary footpath. New street trees are indicated along the new road frontages which is said to achieve a 2:1 replacement ratio.

The Councils Tree Officer advises that whilst having no objection in principle, and acknowledging the outline nature of the application, further information is needed to ensure satisfactory separation distances are achieved between retained trees around the boundaries of the site and some of the proposed elements (houses, parking bays and roads) as well as ensuring appropriate tree protection measures are achievable, including root protection areas. This is also to reduce later pressure for their removal due to overshadowing of new gardens or perceived maintenance difficulties.

One such area is the northern line of tall leylandii trees. These currently form a good screen of the site to neighbours in Chesterfield Road to the north. However, their retention close to new houses and streets would very likely cause potential maintenance issues. As such it is considered preferable to fell these in favour of new tree and shrub planting in a buffer margin of up to 4m width. This should form part of an amended parameter plan and avoid large-leaved varieties, in accordance with recent advice from the national Railtrack office.

The overall landscaping strategy is considered broadly acceptable. Some points of required clarification include the proximity of the southern hedgerow to the illustrative southern road loop, which appears to remove trees and possibly areas of hedgerow. At the western boundary, information regarding the coexisting of large boundary trees and the service margin is also needed. Furthermore the planting space for new individual roadside trees appears to be very tightly arranged and prone to damage (e.g. by cars reversing off of driveways). It is also unclear whether these trees would be in the adopted highway or individual curtilages. Further information has been requested for consideration by the Councils Tree Officer and an update will be given.

Subject to the provision of satisfactory information the proposals could represent a net gain in tree planting in accordance with the provisions of Core Strategy Policy 13 and the NPPF.

Biodiversity

The proposal is supported by ecological surveys which consider the biodiversity and habitat potential of the site and its surroundings. Whilst the site is largely of low biodiversity, there is some potential for protected species, for instance foraging by bats associated with the railway verge.

Accordingly ecological mitigation measures including ecologist supervision of demolition and felling works and new planting and appropriate external lighting controls in the new development are likely to have an acceptable ecological impact. Potentially the proposal could provide a net gain in biodiversity through appropriate soft landscaping and the retention of the existing southern boundary hedgerow which serves as a wildlife corridor. With the imposition of appropriate planning conditions to secure ecological mitigation measures and wider soft landscaping/green infrastructure details, the proposal would have an acceptable impact on biodiversity in accordance with the provisions of Core Strategy Policy 13 and the NPPF.

Drainage and Flood risk

The site is located within flood risk zone 1 (FZ 1), with low probability of flooding from fluvial or tidal sources. However, small pockets of localised ponding exist within the site with higher risk from groundwater flooding. The Flood Risk Assessment (FRA) and drainage strategy submitted with the application assesses these risks. In accordance with NPPF and Policy 15 it proposes a sustainable drainage (SuDS) strategy which is aimed at reducing the rate of existing surface water runoff rates. This would include below ground attenuation storage and with a restricted discharge rate to the main sewer. The initial plans also assumed the provision of a swale in approximately half of the open space, which has now been removed in order to provide a workable open-space layout.

It is recognised that forms of SuDS and ground infiltration would need further investigation due to limitations arising from ground contamination, in order to identify more precisely the amount of attenuation which could be achieved. Other approaches such as pumping of surface water are not considered sustainable. Whilst that the detailed design would be determined at the reserved matters the Borough Drainage Engineer and Lead Flood Authority have requested further information and an updated strategy for this outline stage.

In terms of foul water drainage, Southern Water has confirmed they can provide for adequate sewage disposal. A condition can be used to require this for approval in liaison with Southern Water and that the detailed design should take account of existing water mains and sewer infrastructure.

Land Contamination and Remediation

The previous brickfield use of the site and former industrial use of neighbouring land presents a medium risk of land contamination. The supporting contamination assessment identifies site contaminants where samples have been taken around the site. Further sampling would be needed once buildings are demolished.

The Environment Agency and Environmental Health Officer raise no objections subject to conditions to secure further ground investigations and remediation, control over SuDS Infiltration systems and ground piling to safeguard underlying strata and secondary aquifer. Clarification has been sought upon the use of the standard planning condition, which it appears will need an additional stage of investigation once buildings are demolished and a likely separate condition for asbestos removal methods in the demolition work.

Subject to this confirmation it appears that the proposal would meet the requirements to manage pollution impacts in accordance with the provisions of the saved local plan policies RES7, RES9 and the NPPF.

Other Matters

Crime prevention

In accordance with s.17 of the Crime and Disorder Act, management of risk of crime is a relevant consideration. Whilst comments have not yet been received from Sussex Police, the illustrative layout indicates that development could achieve a good degree of passive surveillance in most parts of the site and it would have the benefit of providing lighting and an improved surface for the existing paths along the southern and western boundaries. Lighting will need to balance safety and amenity considerations, for instance to avoid light pollution for existing and new residents or for nature conservation interests. This can be achieved through use of a planning condition.

In the detailed layout it will be important to ensure that all spaces are well defined, purposeful and defensible. For instance the areas between apartment blocks, parking and footpaths, most notably the area towards the well-used railway station and routes to it. Clear open lines of sight within pathways and public realm and well defined defensible boundaries should combine to promote an ambience of safety at all times of day and night. In view of this a planning condition would require the submission of a Safe Environments assessment as part of a detailed application.

Health

The management of demolition and the remediation of contaminated land would be subject to planning conditions for subsequent consideration and discharge in consultation with the Environmental Health officer and, in the case of groundwater, the Environment Agency.

Advice I awaited from the NHS Clinical Commissioning Group regarding health care matters, mindful of the increase in residents and the care home element of the proposal. An update will be given.

Waste and Recycling

Recycling and refuse bin storage for houses will be in private rear gardens with access way, such as side passages which will be at least 1m wide and not more

than 30m long to enable wheeling forward to edge of garden/boundary for collection.

Apartment blocks would have communal, internal ground floor bin stores. An area has been assumed in the illustrative footprint of each block for communal bin sizes to meet the Council's standards and 25m collection distance. The care home would also have an internal ground floor bin store and the plans illustrate accessibility for collection vehicles and a 25m collection distance.

As already mentioned, in the illustrative layouts access for collection vehicles relies upon no roadside parking other than in identified bays.

Phasing

The application is described as phased. This would allow for the development of a series of sub-areas within the site, possibly by more than one developer. It would be important to ensure that relevant infrastructure is provided at appropriate times and appropriate rates, for example, site accesses, including the emergency western access; improved foot & cycle-paths; drainage; open space, parking, car club vehicles and landscaping.

Some of these elements would be subject to a legal agreement, (e.g. pathways, open space and car club provisions), but a planning condition would be needed to manage others and to ensure consistent programming.

Planning Obligations & Community Infrastructure Levy (CIL)

In the event of planning permission a number of provisions would be required by legal. These are summarised in the following Table 3. Alongside these provisions, development would be liable to make payment under CIL towards the provision of local infrastructure. The applicant estimates this to be around £858,000, although the final amount can only be calculated when the precise floor space is known at the reserved matters stage.

Table 3: Matters for Legal Agreement

No	Matter	Note
1	Affordable Housing	Minimum provision of 7% (70 % rented and 30% shared ownership) subject to scheme viability review at Reserved Matters Stage. Commitment to pursue Homes England grant funding to secure 30% affordable housing.
2	Highway Provisions	i) Junction improvement at Barrington Road / Shaftesbury Avenue ii) Provision of bus stop improvements – 2 shelters in Shaftesbury Avenue (or within 400m of the site) with real time information

		<ul style="list-style-type: none"> iii) Obtain Traffic Road Orders (TROs) for works in the highway, including parking restriction at side entrances in Barrington Road (east and west) iv) Road adoption, including short extension to Barrington Road (west) and turning area and emergency access control facility v) Non-adoption road clauses (for areas unsuitable for adoption). vi) Any other highways works outside of the red boundary line. vii)
3	Foot/cyclepaths	<ul style="list-style-type: none"> i) Provision of 3-3.5m wide cycle/footpath at southern boundary at Barrington Road including signage, lighting and connections to adjoining roadway in Barrington Road (east and west) and three streets to south and into development site to the north. ii) Provision of 2m wide footpath at eastern boundary iii) Dedication of cycle/footpath at (3.ii & 3.iii) for public use. iv)
4	Access to western 'nib' land and beyond	Provision of access to western boundary and further provision of access from nib land into 'AOC6 land' to north or west.
5	Travel Plans	<ul style="list-style-type: none"> i) Appointment of Travel Plan co-ordinator to work in liaison with Highway Authority in implementation and monitoring of Travel Plans over five year period. ii) Financial contribution to Highway Authority to cover work in liaison and monitoring
6	Car club	<ul style="list-style-type: none"> i) Provision of three car club cars (first one within one month of first occupation, second at 20% occupation, third at 50%) ii) Subsequent maintenance of car club cars and car club parking spaces iii) Provision of paid membership for all residents at the site for at least three years including one-off £50 drive time payment each. iv) Provision for other car club spaces to be dedicated and used for car club vehicles. v)

7	Recreation	<p>i) Financial contribution £100k for provision of public open space and recreation works, improvement or space within [] wards.</p> <p>ii) Provision of play area within central open space and transfer to Borough Council with a commuted sum to ensure future maintenance.</p>
8	Site Management	<p>Management & Maintenance of:</p> <p>iii) Unadopted public realm (except central open space if transferred to Borough Council), including vegetation, signage and street furniture</p> <p>iv) Unadopted streets</p> <p>v) Parking Management Plan – including car parking spaces and car club spaces and cycle stores;</p> <p>vi) Any on-site communal heating system</p> <p>vii) Surface water drainage – management & maintenance strategy</p> <p>viii) Bin stores and bins</p> <p>ix) Any communal spaces or roof gardens, including watering and pruning;</p> <p>x) any noise attenuation measures.</p> <p>xi)</p>
9	Air Quality Mitigation	Financial contribution [£] if required for air quality mitigation measures and monitoring, within [] wards, or Air Quality Management Area or [metres] distance of site.
10	Durrington Bridge House	No change of use or permitted development conversion to residential or non-Class B purposes within 3 years. Ensure active marketing for office use.

Summary and Planning Balance

Although the site is subject to Policy 4 of the 2011 Core Strategy, which seeks to retain employment use, the subsequent reality of Permitted Development allows for the possibility of residential use, as evidenced in the subsequent Certificate of Lawful Use for the site. The emerging policy AOC5 reflects this and allows for a mixed residential and employment use of the site including the additional nib land to the west.

The current application offers the possibility of a range of residential densities, which although higher than the emerging Local Plan have some successful local precedent at the nearby Bolsover Road, Former 6th Form College at the lower end

of the range. Importantly the current proposals also provide access to the nib land to the west with potential thorough legal agreement, to then unlock further development of unused land to the west for mixed development as part of a wider collaboration. The ability for development of the application site to operate with a range of potential numbers and densities, going somewhat higher than the Bolsover Road example, provides added incentive to realise this wider potential development.

In addition the proposal provides an opportunity to retain employment use at Durrington Bridge House, also owned by the applicant. In light of these merits and mindful of the emerging policy, despite its much lesser current weight, the proposal is considered to be acceptable in principle.

In considering this outline application, much of this report has examined the illustrative material, including the two Option Plans A & B. It is important to note that neither of these are prescriptive, they serve only to test whether the amount of development for which permission is sought, can be accommodated in a manner which produces a high places, in accordance with National policy's view of the fundamental role of the planning and development process; also the extent to which a mix of homes could be provided to reflect local needs.

In this case the assessment concludes positively that this can be achieved, and that whilst there are some points of reservation concerning some aspects of the illustrative plans, such as relationship to trees and hedges and the dispersal of parking spaces and the provision of communal space, there is sufficient latitude to reconcile these matters at a reserved matters stage. However there are some important qualifications to this.

Firstly, the suggested parameter plans using a grid-based approach to the layout, whilst helpful in testing development quantum at this outline stage, are considered to be too rigid for the reserved matters stage. They would dictate a layout, particularly in the case of the apartments, which precludes more varied approaches to form and design. These are likely to be needed to accommodate a high density enclave and address the existing noise climate of the railway and station. A freer hand will also allow reconsideration of the shapes of blocks, lessening the risk of slab-like proportions and allowing the relationship between buildings and in turn their adjoining spaces to produce well defined curtilages and public spaces.

Secondly, in consideration of communal space, it is unlikely that the amount sought by the Councils SPD can be provided in full. The recent Lloyds site redevelopment illustrates that a limited enclave of lesser provision can still produce a successful development, but it is important that a balance is struck in a detailed scheme and that this approach is not too widely used. Where it is used, high quality private or semi-private balconies or terraces would be a reasonable expectation. The presence of the proposed central open space is part of this balance and will require thoughtful design in order to provide for a range of resident's needs and age-groups.

Thirdly, the intrinsically sustainable location is seen as an opportunity for greater emphasis on sustainable transport. Subject to the comments of the Highway

Authority on recent amendments, the amount of parking spaces proposed could be accepted. However, a much less formulaic layout, such as that of the Bolsover Road site, could facilitate a better dispersal of these and integration with landscaping, including spaces for more resilient tree planting than the somewhat pinched and prone arrangements shown.

More fundamentally, the balance of private car parking to other sustainable measures could be pursued further in a detailed application. For instance lower parking ratios for retirement living if suitably justified and evidenced by a future developer. This in turn would allow for a greater amount of space to be used for amenity and landscape purposes. Another way to achieve this is to build further on the club proposals in the current application. A reserved matters application might provide more car club vehicle and justify a reduction in parking space, particularly for residents of future apartments.

In terms of dwelling mix it seems probable that the proportion of three bedroom houses could not be much increased beyond that shown in the illustrative plans, without lowering overall numbers. It therefore remains probable that the development will not accord with the proportions set out in the recent SHMA. However, in this particular location, the achievement of the higher number of dwellings is considered a more appropriate outcome, particularly if this includes greater emphasis on sustainable transport approach and high quality design. An informative attached to a grant of planning permission can emphasise the expectations for high quality and sustainable development.

In respect of affordable housing the offer is low but reflects the high costs of developing this site and the impact of CIL and s106 contributions together with the high land value generated by permitted development rights for the existing office buildings. Nevertheless, with the uncertainty about values at this outline stage the ability to undertake a viability review at the reserved matters stage provides Members with some comfort that there is some potential for a higher percentage to be achieved. The applicant has also agreed to pursue Homes England funding to help address infrastructure costs and hopefully provide affordable housing grant to ensure the delivery of 30%.

There are some outstanding matters on which information is awaited, including noise, surface water drainage, trees and some highway matters and response from the Clinical Commissioning Group. Updates will be given on these points.

In summary the application offers several positive possibilities for a successful future development of the site. Work is ongoing between officer and the applicant to revise and in several cases simplify and hone development parameters in order to provide a clear framework within which a reserved matters application can follow. In terms of planning balance and subject to the outcome of those remaining matters, the proposal can be supported.

Recommendation

It is recommended that the decision to grant planning permission be delegated to the Head of Planning subject to the receipt of satisfactory additional and amended material referred to in this report and satisfactory comments of consultees including the Highway Authority, Environmental Health, Engineer and Clinical Commissioning Group; the completion of a planning obligation (s106) covering the matters set out in Table 3 of this report and subject to the following conditions (and any further appropriate conditions raised by consultees):

** Asterisk denotes 'pre-commencement' conditions. Some matters such as the submission of materials, are to be settled 'before works above ground or slab level'*

1. Approved Plans
 2. Standard 3 year time limit
 3. Reserved Matters details of appearance, landscaping, layout, scale to be approved*
 4. Maximum 287 dwellings
 5. Parameter plans – broad accordance with:
 - a) Scale and height (not to exceed parameters)
 - b) Site layout houses and apartments
 - c) Street hierarchy
 - d) Site boundaries and buffer planting
 - e) Open space quantum and characteristics
 6. Accesses – larger scale detail drawings to be approved*
 7. Access to be provided to western 'nib' land
 8. Details of parking – amount, location and allocation, to be approved
 9. Development phasing to be approved*
 10. Site levels to be approved
 11. Details of drainage to be approved in accordance with drainage strategy
 12. Ground remediation, staged details for approval and verification*
 13. Safeguarding of groundwater/ approval of any piling*
 14. Biodiversity safeguards and mitigation to be approved*
 15. Details of boundaries and means of enclosure
 16. Sustainability plan to be approved
 17. Safe Environments plan to be approved
 18. Archaeological investigation works and reporting to be approved*
 19. Lighting plan to be approved
 20. Construction Management Plan to be approved*
 21. Hours of work*
- And any other appropriate conditions

Adur & Worthing Councils

REPORT (DRAFT v1)

Viability update 30 06 2020

**Development at Durrington Estate,
Worthing
BN12 4XL**

June 2020

DSP19407N (F1)

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DixonSearle
Partnership

Further commentary on viability of proposed development of Durrington Estate

DSP19407N (F1)

1. Introduction

Following our February 2020 review report and subsequent dialogue, the Council has asked DSP to further consider three elements of the viability appraisal:

- Premium over and above “embedded”¹ residential values for the retirement apartments
- Inclusion of ground rents for the retirement apartments
- Approach and value in relation to benchmark land value (site value)

2. Background

As per our previous commentary, and acknowledged by BNP, the scheme proposal is in its early stages, and there is considerable uncertainty over some of its elements and thus the appropriate assumptions to use. This is reflected in the outline status of the application proposals, which in turn had led to DSP’s comments on the appropriateness of/level to which viability should be reviewed or even provisionally settled now – as a comment for/question to AWC.

The Council informs us that layout, design and density might change, affecting the achievable amount of housing generally as well as the mix of development. One key ‘unknown’ is the scheme may come forward with the apartments as standard residential units rather than as retirement housing, in which case both costs and values would differ significantly.

As stated previously, we do not consider this the most suitable stage at which to review viability and agree policy concessions.

The review here is within the context of a large scheme proposal and the effect of even a small change in assumptions, when spread across development of such a scale translates quickly into significant changes in the viability position. As one example of such an effect, during the time this scheme viability has been discussed to date, the build costs within BCIS data (on which the estimate of construction cost is based) have varied by relatively small amounts which have magnified to a significant change in the viability position.

¹ As described by the BNP, which we take to mean the premium on top of general residential values for these apartments.

Throughout the discussion on this site it has been acknowledged that there are various other unknowns too – for example around abnormal build costs. DSP tested the viability using lower abnormal costs than within the submitted assumptions – however BNP have suggested that whilst costs are unknown they could in fact be higher, particularly considering amendments to the infrastructure works which have been requested by the Council. This is not necessarily disputed but affirms the situation as above.

Within the unavoidable limitations above, we will endeavour, as requested, to reach a conclusion as far as possible at this stage on the potential of the scheme to support affordable housing.

3. Assumptions discussion

Premium over and above embedded residential values for the retirement apartments

BNP have asked us to comment further on this aspect.

There is a premium for new-build retirement properties over general market housing. We regularly see this.

RHG² states the following: *“Methods of price setting for retirement housing vary by location. In medium and low value areas the price of a 1 bed sheltered property = approximately 75% of the price of an existing 3 bed semi detached house. A 2 bed sheltered property = approximately 100% of price of existing 3 bed semi detached. In high value areas with a high proportion of flats the price of a 1 bed sheltered property is linked to the price of high value flats, normally with a 10-15% premium”.*

In our experience the premiums discussed here are if anything conservative.

In terms of retirement values for the scheme generally, we maintain that DSP’s original sensitivity test applying values 10% above the BNP proposed assumption represents a suitable assessment given what we know currently, and we note that these values are below average for the area

² The Retirement Housing Group (RHG) is an independent membership organisation working in the property industry.

(acknowledging that the particular location/site may well not support top of the range values for retirement apartments).

We have discussed this with the Council's planners and they consider that whilst located close to basic shopping facilities and some other amenities the site is not especially convenient for access to the main shopping area and demand for the units and/or values may be affected by proximity to the railway line. DSP does have some mixed feelings about this however, as many relatively high value schemes are brought forward adjacent or close to busy roads, junctions, roundabouts and also rail lines – as are often found in the more convenient locations. We will however run our appraisal with the latest values put forward by BNP (A sales rate of £356.30 psf for the retirement apartments) and will test applying increases of 5% and 10% on these values to illustrate the sensitivity of the appraisal to a relatively small improvement in the sales values, given our view on that as a base assumption. This should all be considered as part of an overall view of the viability of the scheme; however the council may wish to include a review mechanism to deal with capturing a share of any uplift that may be achievable from the submitted values, as part of redressing a policy deficiency.

Inclusion of ground rents for the retirement apartments

BNP suggest this should be dealt with via a review mechanism.

However, the Government has now confirmed (in response to its consultation on the matter) that retirement housebuilders will be exempt from the plan to remove the ability to charge ground rents.

BNP/Savills state that nonetheless, there is no intention to charge ground rents. As far as we can see, the Council cannot rely on this happening and perhaps especially as the scheme or elements of it could ultimately be developed by different parties. Furthermore, MHCLG have stated that this exemption will be subject to housebuilders offering buyers the choice of paying a higher purchase price in exchange for zero ground rent; so either way it seems reasonably likely that there will be additional value derived from the potential to charge ground rents.

As an example of a leading developer in the sector's approach, McCarthy & Stone suggest the following, in the light of recent Government announcements:

"Our ground rent terms:

- *Typically between c.£400-£500 per year*

- *On fair and stable terms*
- *Fixed for 15 years, longer than the average stay of our residents*
- *Increases linked to inflation or two per cent per annum if higher, and compounded yearly*
- *We remain as the landlord with all management responsibilities"*

DSP's opinion is, therefore, that ground rental income should be included for the retirement flats. We have included ground rents at £350 per unit per year in our appraisal, which is below the range suggested by McCarthy & Stone, above.

The Council could choose to deal with ground rents via a review mechanism, which would result in a payment being made to the Council at a later stage should ground rents be included (whatever the tenure of the apartments).

Other appraisal adjustments

Referring back to BNP's rebuttal to our review report, we have adopted their suggested build costs (based on updated BCIS figures), marketing and legal costs (based on a compromise between BNP's view and DSP's), thereby applying the following:

- Retail construction £161.92 psf
- Houses construction £133.56 psf
- Retirement apartments £196.82 psf

MARKETING & LETTING

Marketing Resi	1.00%
Marketing Retirement	1.50%
Letting Agent Fee	10.00%
Letting Legal Fee	5.00%

DISPOSAL FEES

Sales Agent Fee	1.50%
Sales Legal Fee	0.50%

We have for now included the external/abnormal costs assumptions as submitted by BNP. As discussed previously, however, these are uncertain and DSP allowed for potentially lower costs, but in coming to this view as a potential compromise we note BNP's statement that these costs could be higher than stated - given that changes have been requested by the Council which are likely to add to the infrastructure costs. Again, a point to consider in the overall viability picture at this early stage.

Profit

We have maintained our assumption (used by BNP in their latest appraisal) of a 17.5% developer return on all elements including retail, which represents the mid-point of the range suggested by the within the PPG in regards to plan-making and also reflecting DSP's recent experience. From experience it could be appropriate to assume a lower profit input for the retail element, at 15% GDV, though we note that this would make little difference to the outcome overall.

Finance

We have assumed our suggested finance rate of 6.5% representative of costs including all fees (accepted by BNP for the purposes of their most recent appraisal).

4. Outcome on this basis - Residual Value

Applying these changes to our appraisal results in a residual value of £2,151,340.

Applying just a 5% increase to the assumed base (BNP) value of the retirement apartments results in a residual value of £3,291,509.

Applying a 10% increase to the assumed base (BNP) value of the retirement apartments results in a residual value of £4,431,802.

These sensitivity tests (based on nil affordable housing on site just for current baseline review/exploratory purposes) illustrate the above points.

5. Approach and value in relation to BLV

The residual value then has to be compared to a suitable benchmark land value.

We understand that there is a certificate of lawful development for conversion of the building into up to 254 residential units. We understand that the design of those potential units and how planning and building control requirements are to be met have yet to be agreed. The applicant team has not provided these details to our knowledge. It is not clear whether 254 units could be provided for the costs suggested (as a conversion for flats would appear very challenging to complete economically within the current floor plan, and would have to meet the council's and

other usual requirements for heating, light and safety etc.), and there is also uncertainty about the values relating to these units too – it is unclear what the market would be for such dwellings in this building, and perhaps particularly without significant investment in the exterior appearance as well as the interior and its cohesive use to support viable values.



We note that the residual value submitted by BNP for the AUV conversion scheme is £3 million, however the residual value for the proposed scheme was originally stated to be negative, and is most recently stated to be £1.325 million in BNP's opinion. This does not appear consistent with a decision to proceed with the proposed scheme rather than the AUV scheme. The Planning Policy Guidance on viability states the following (our highlighting):

“Plan makers can set out in which circumstances alternative uses can be used. This might include if there is evidence that the alternative use would fully comply with up to date development plan policies, if it can be demonstrated that the alternative use could be implemented on the site in question, if it can be demonstrated there is market demand for that use, and if there is an explanation as to why the alternative use has not been pursued. Where AUV is used this should be supported by evidence of the costs and values of the alternative use to justify the land value. Valuation based on AUV includes the premium to the landowner. If evidence of AUV is being considered the premium to the landowner must not be double counted.

See related policy: National Planning Policy Framework paragraph 57

Paragraph: 017 Reference ID: 10-017-20190509

Revision date: 09 05 2019”

BNP have discussed landowner expectation for the value of the site with reference to the AUV of the scheme as permitted development, applying rates paid for similar sites with permission for conversion to residential to the subject site which result in values of over £20 million for the subject site. Similarly, in our view this does not appear consistent with BNP's statement that: *“the Applicant does have a robust alternative scenario in the form of a disposal of the site for a*

conversion to residential”, yet “This is not the Applicant’s preference as they wish to work with the Council in order to deliver the proposed outline development.”

We consider an assessment of the EUV of the building – i.e. as low grade commercial space in current form - to be more appropriate and informative in considering and appropriately setting a Benchmark Land Value.

With this in mind, BNP have also assessed EUV as follows:

“We have assumed that 50% of the floor space of the existing building could be let at a minimal rent for many purposes. This results in a potential lettable area of 94,982 sq ft. We have assumed a modest rent for the accommodation of £2.50 per sq ft resulting in a total rent of £237,455 per annum. After an allowance of one year for letting voids and incentives we have capitalised this income at a yield of 10%. This results in a gross value of £2,158,670. After an allowance for purchaser’s costs in accordance with market practice this results in a net value of £2,011,881 (say £2,000,000).”

The building is outdated and in poor condition, however we understand it was occupied until recently to at least 50% capacity. The above valuation assumes the offices could be let in their existing state, without any refurbishment required in order to find a tenant. The assumed rent is low, reflecting the need for this refurbishment or for the occupier(s) tenant to carry out their own refurbishment of the interior.



The capital value, once the suggested yield has been applied, represents circa £10 psf based on the GIA of the whole building.

There are no comparable properties for let (or sale) in the immediate area. Most of the available office space locally is smaller, or more modern/fully serviced. It is not clear what the demand for a large amount of outdated office space would be – however it is fair in our view to assume that at least some of the space could be let, and indeed we understand that some of the space is currently let to the charitable sector.

We note that some parts of the offices are in better condition and benefit from a better layout than others. Another way to approach the EUV would be to consider a smaller proportion of the building being lettable, but commanding a higher rent more aligned with the local market – this leads to a similar figure.

Overall, we consider a proposed EUV assumption of £2 million to be not unreasonable in the circumstances.

A premium to the landowner can then be considered – usually between 10% and 30% applied to the EUV of a site such as this, to represent the incentive to the landowner to proceed with a change from the existing use. In this case the building is at the end of its life and requires significant investment to bring it up to modern standards and make the whole space usable at anything other than an effectively nominal rent. In that sense there is arguably little incentive required to proceed with its release for development as opposed to maintaining the existing use. However, we acknowledge that a landowner will expect some degree of uplift from existing use value, in order to release premises at a particular point in time.

Applying the middle of this 10% to 30% range to the suggested EUV results in a BLV of £2.4 million. (Without being too conservative, a BLV above £2.2 million and not exceeding £2.6 million seems appropriate).

Whilst there is uncertainty about the demand for/lettable of the building in its current state and what in reality this means for a judgment on the appropriate uplift, on the above basis we consider a value of £2.4 million including premium (i.e. as the BLV) to be suitable for the purposes of this assessment.

6. Latest appraisal results

Comparing the residual value of our appraisal, using BNP's submitted sales values for now, indicates a deficit of -£248,660 against a benchmark land value of £2.4 million. Whilst a negative outcome, this is quite marginal in the overall scheme of things here, and also shown here to be highly sensitive to changed assumptions.

In our opinion, sales values for the retirement apartments (if pursued) are likely to be 5% to 10% higher than the submitted assumptions, however, without being too positive about this.

Applying a 5% increase to the BNP sales values for the retirement apartments indicates a surplus of £891,509 against a benchmark land value of £2.4 million.

Applying a 10% increase to the BNP sales values for the retirement apartments indicates a surplus of £2,031,802 against a benchmark land value of £2.4 million.

We understand the scheme may come forward with the apartments as standard residential units rather than as retirement housing, in which case the increased sales values we suggest as possible would most likely not be realised based on current review and information, as far as we can see, although of course that could be found to be different in due course. The Council has asked us to test this scenario (general residential in place of retirement use). The build costs used in the appraisal are based on rates for retirement housing so we have tested within our appraisal using the values for standard residential apartments as submitted by BNP (at an average of £323 psf) along with a build cost assumption based on the BCIS 5 yr median rate for flatted development (3-5 storeys) which at today's date is £138.24 psf. This results in a residual value of £8,564,080 and therefore a surplus of £6,164,080 against the above noted £2.4m benchmark land value view.

7. Updated summary

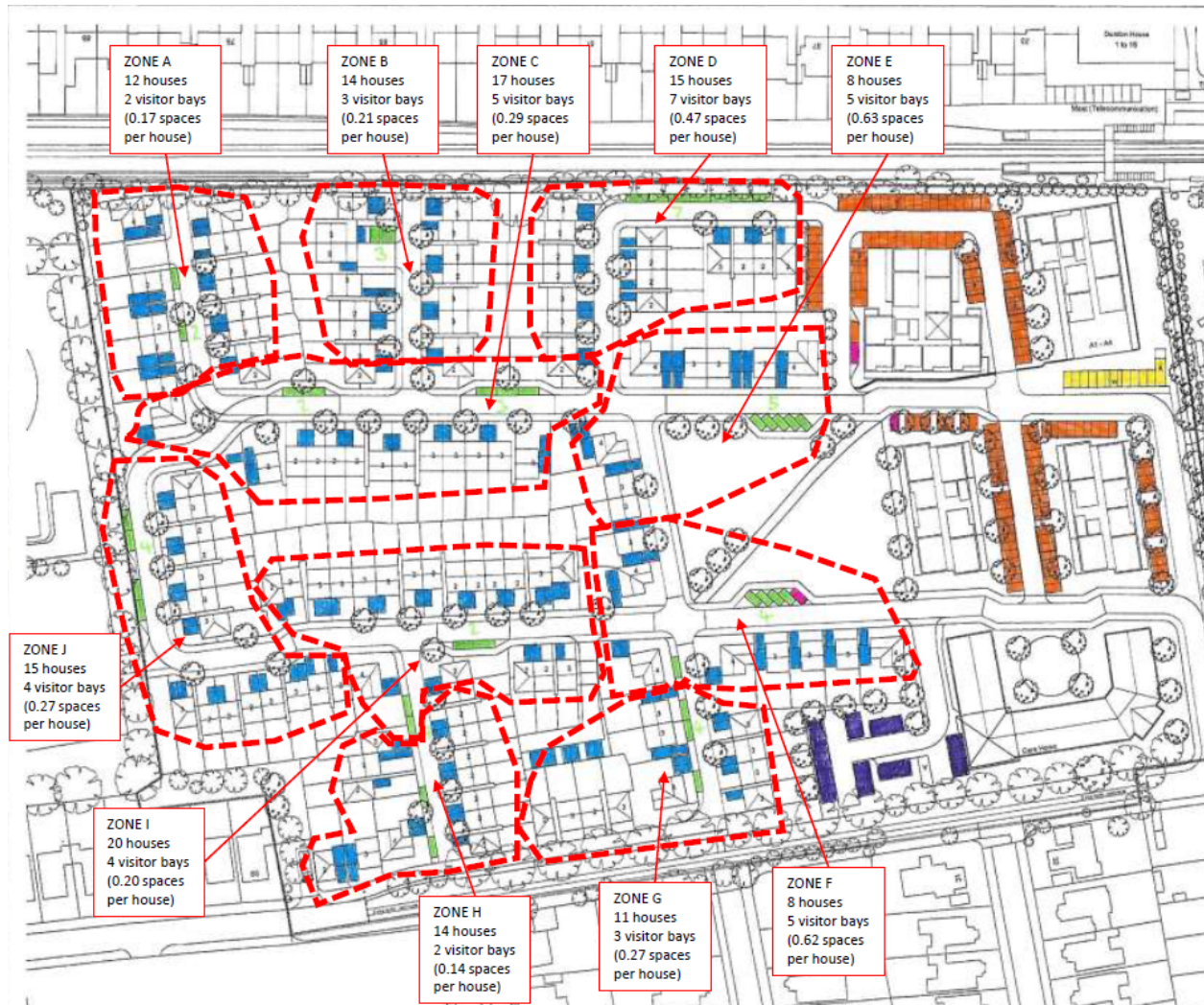
The significant variation in appraisal results above supports our continued view that it is too early a stage to fix policy concessions, particularly if nil affordable housing is to be agreed – and perhaps even as a baseline subject to later review.

The type/tenure of the apartments is not fixed and may have implications for very different values and build costs, and therefore viability, depending what is decided.

At the very least there should be some form of review mechanism to ensure that whichever scenario comes forward in practice makes the appropriate planning contributions.

Alternatively, the Council may wish to engage in discussions which will firm up what is to be delivered and / or to consider that a nil AH outcome or baseline has not been satisfactorily justified; as a minimum in our view there should be a review, if not a low level of AH agreed in conjunction with a suitable review approach.

Report ends
30 June 2020



Parking layout plan
(unallocated spaces in green for housing areas and brown for apartments)

Application Number: AWDM/0769/20

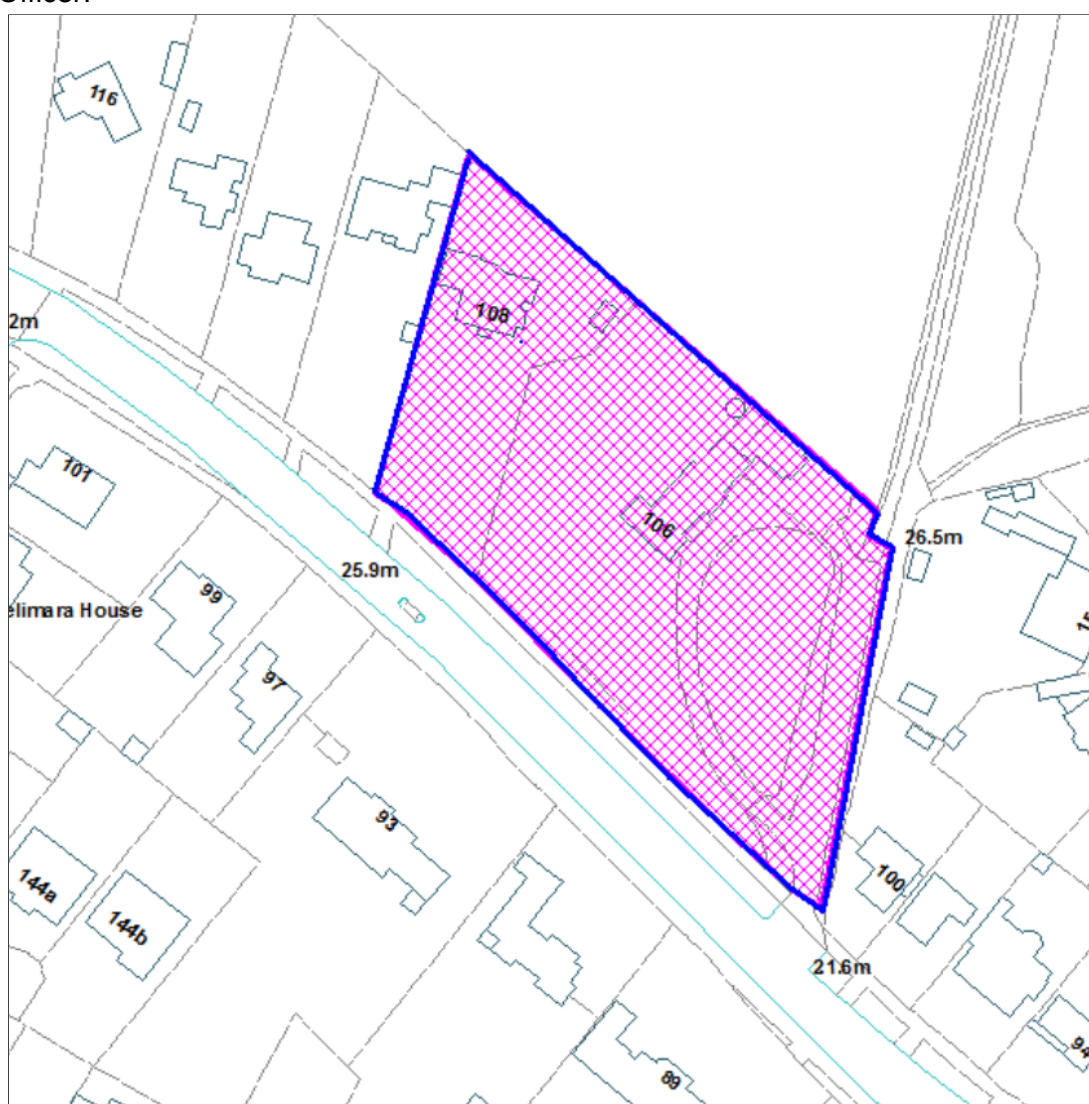
Recommendation – Delegate to Head of Planning for approval subject to the receipt of satisfactory comments from consultees.

Site: 106 -108 Warren Road, Worthing

Proposal: Demolition of No's. 106 and 108 and construction of a two and a half storey 82no. bedroom care home (C2 Use) and associated car parking and facilities.

Applicant: Aspire LLP
Case: Stephen Cantwell
Officer:

Ward: Offington



Not to Scale

Site and Surroundings

The application site lies on the north-eastern side of Warren Road (part of the A27) within a residential area 2km to the north of Worthing Town Centre. It comprises two the existing houses and gardens of nos. 106 and 108 Warren Road. These plots are aligned roughly north-west to south east, fronting onto and parallel with the A27 Warren Road. The site slopes by roughly 7m from the west, downslope the east and approximately 2.5m - 5m above Warren Road, with no.108 being at a higher level than no 106.

To the rear (north) is the woodland edge of Hill Barn Golf Club, which is also the edge of the South Downs National Park and designated a Site of Nature Conservation Importance. A bridleway (no.2081) runs along the eastern boundary between Warren Road and the Golf Club and is partly tarmac surfaces but largely unmade with informal grass and shrub margins, it currently provides two vehicular access points to no.106.

Adjoining the bridleway and slightly downslope are the rear gardens of houses in Hillside Avenue to the east as well as no. 100 Warren Road. Here there are several trees in neighbouring gardens, providing a substantial but partial screen. To the east of the site are detached houses fronting Warren Road, each with individual driveways leading from Warren Road across a wide grassed verge, such as the vehicular access serving 108 Warren Road. Frontages are marked by a long flint wall and gate posts with tall, dense mature trees in front gardens many of which, including those on the application site, are subject of a Tree Preservation Order (TPO) as considered further below.

No 106 comprises a large two-storey detached Georgian-style house with mansard roof and second floor dormer windows facing eastward, it has an associated two storey coach house towards its northern boundary. The house is set well-back from and is at a higher level than Warren Road itself and has a frontage of approximately 100m. No. 108 is a detached two storey house set within a smaller mature plot of approximately 20m width.

To the east, west and south the surrounding context is predominantly residential comprising large two storey detached dwellings set back from the road. The surrounding built form has a variety of designs and external materials including brick, render, tile hanging and feature timber work.

The site is within walking and cycling distance of a range of town centre facilities. Public transport links are available on Warren Road including bus route 23 which provides connections to the north and south linking Crawley and Worthing with stops including Horsham in-between.

As discussed further below, a previous application for a care home within the site related only to the 0.44ha plot of 106 Warren Road, which is noted is significantly wider and larger than others in Warren Road. By contrast the current application site encompasses both 106 and 0.11ha at 108 Warren Road to provide a total site of 0.55ha.

Proposal

Planning permission is sought for the demolition of the two houses and the erection of an 82 bed care home for the elderly (Class C2 use). This would employ an estimated 10 full time and 20 part time staff. The building would measure 65.5m x 34m overall length and depth. This equates to approximately 65 percent of the Warren Road frontage and 60 percent at the bridleway.

In terms of height the central core area of the building would be just over 14m, with a projecting tower feature of 17m. This would provide between three and four storeys of accommodation, with the top floor contained in the roof, lit by dormer windows and those in the tower. The wings would be approximately 11m tall, providing three floors of accommodation, the uppermost also in the roof with dormers. The eastern wing would step down to 10m for the last 8m of its length. The proposed heights compare with the approximate 9.6m height of the existing house at no.106 and its coach house of 6.2m, and at no.108 the approximate 8m existing height.

The proposal would involve cutting into the sloping ground by a depth of 2.3m so that the eastern half of the proposed building is set below that to the west. To the west ground levels would also be partly raised by varying amounts up to 0.9m to create a level surface

The design is broadly traditional in form, using a series of pitched-roof forms and stepped masses and brickwork and tile-hung facades. A series of projecting gables of varying sizes and a tower feature appear Edwardian / Arts & Crafts in character.

Internal accommodation would comprise 82 en-suite care rooms, treatment rooms, café, dining areas, lounges, treatment rooms, nurse stations and other associated facilities including commercial kitchens, laundry areas, staff welfare and plant room. Floorplans show that these secondary spaces are located largely within the basement area, away from resident's areas.

The principle access to the development would be from the Warren Road frontage upgrading of the existing access of no. 108. This access would be for visitors and staff leading to 21 new car parking spaces (2 disabled) in front of the main building entrance. The existing coach house access from Bridleway to the east would provide a second access for servicing and a further 6 car parking spaces. Nine electric vehicle (EV) car charging points would be provided and storage for 4 cycles.

The external layout shows the care home being set back 20m – 35m from the Warren Road Frontage and 21m – 28m from the bridleway with the majority of existing trees retained, although three mature trees in the centre of the site would be felled and replaced as discussed further below. The external layout shows landscaped communal gardens and other facilities for refuse and cycle storage enclosures.

The application is accompanied by:

- Air Quality Assessment
- Noise Impact Assessment
- Design & Access Statement
- Ecological Appraisal
- Flood Risk / Drainage Assessment
- Energy Assessment
- Lighting Assessment
- Plans and Elevations (including overlay of existing)
- Transport Statement and Framework Travel Plan

- Tree Method and Impact Assessment

Relevant Planning History

AWDM/0884/18 – (106 Warren Road only) Demolition of existing house and erection of three and half storey 60 bedroom care home with access from Warren Road following the demolition of the existing building.

The application was refused by Committee on 4 Oct 2018 for the following reasons:

- 1. The proposal by reason of the size, height and mass of the proposed building, its elevated level and its position, which brings development much closer to the site frontages, would create an excessively built-up and over-developed appearance, which in combination with the amount of hard-surfacing and ancillary building at the access and parking and manoeuvring area will erode the spacious character of existing development. Furthermore, the design of the building, with a large proportion of glazing, long unbroken ridgelines and little variation in its main facades, would accentuate its size and variance from the prevailing scale and proportions of surrounding houses, which contribute to the character of the area. This is contrary to policy 16 of the Worthing Core Strategy 2011.*
- 2. On the basis of the information provided, the Local Planning Authority is not satisfied that the proposal, which constitutes a significant intensification of use of the site and associated vehicular, pedestrian and other trips, would provide for the safety and free-flow of traffic on the adjacent truck road and bridleway, including the safety of other users, motorists, pedestrians and horse-riders. The proposal is therefore contrary to Policies 12 & 19 of the Worthing Core Strategy 2011.*

WB/171/74 – Outline Application for residential development (including area land at the golf course to the north) – refused in May 1974 (The site was part of a larger 1ha site, including woodland to the north. No detailed layout was included. Refusal was due to incursion into the then Area of Great Landscape Value, now National Park, and increased traffic affecting flow of the trunk road)

Consultations

West Sussex County Council - Archaeologist: No objection

Risk of any archaeological finds is small, given previous development of site.

West Sussex County Council – Flood and Drainage: No objection

- Low risk of surface water flooding and no recorded flooding within the site but high risk from potential groundwater flooding. Any existing surface water flow paths across the site and watercourses should be maintained and mitigation measures proposed for areas at risk.

- Proposed SuDS features include permeable paving and soak-aways. The final drainage strategy based on sustainable drainage principles should include detailed designs, calculations and maintenance for the Council's approval.
- Refer to Environment Agency for advice regarding water source protection zones

West Sussex County Council - Highways: Further Information required:

- Stage 1 Road Safety Audit for changes to the access to the highway and bridleway points and a Designer's Response.
- Traffic generation – would not lead to a significant increase in traffic on the local highway network. Refer to Highways England for Strategic Road Network advice regarding the proposed Warren Road access.
- Highway Authority agreed way forward for potential access prior to the previous appeal being withdrawn. The current proposals are broadly similar to the 2018 proposal but with an increase in bedrooms [larger site] and an additional access.
- Accessibility - located approx. 1 km from town centre and benefits from nearby public transport links with good pedestrian and cycle facilities nearby to encourage non-car modes of transport.
- In principle access onto the Bridleway is acceptable. The Public Rights of Way (PROW) will also comment separately.

West Sussex County Council – Public Rights of Way: Comments awaited

Highways England (HE): Further Information required

- A Stage 1 Road Safety Audit is required for the proposed accesses.
- HE confirms that the peak hour traffic associated with the type of use proposed would be minimal and therefore no further capacity assessment is required.
- A construction management plan should also be secured via planning condition.
- Informal advice is not to grant approval while HE continues to work with the applicant to secure information requested.

Borough Landscape and Tree Officer: Comments,

Proposal would lead to the loss of a significant number of trees of which the most significant are TPO trees Beech (T22) and Red Oak (T23). Consideration should be given to their retention as a feature within the proposed car parking area.

Borough Drainage Engineer: Further information required

- No objections on flood risk grounds, the site is at low risk from surface water flooding and low risk from surface water flooding.
- The drainage strategy is based on SuDS and demonstrates sufficient space attenuation should it be found that infiltration is not achievable
- Planning conditions recommended to secure winter groundwater monitoring, winter infiltration testing and consequent final detailed drainage design

Environmental Health Officer (public health): No objection

No adverse impacts on air quality and noise environment for future occupiers subject to:

- mitigation measures being secured for contribution of £7,796 towards local air quality improvement schemes.
- electric vehicle charging points,
- travel plan,
- noise insulation measures
- Construction Management Plan,
- hours of construction,
- land contamination information.

Environmental Health Officer (Housing): No comments

South Downs National Park: Comments

Proposal has potential to impact the setting of the SDNP but topography and woodland mean no short to medium views from the SDNP but the roof maybe visible from longer distance views at Cissbury Ring which should be clarified as it may influence the roof form and materials.

Support retained/enhanced planting along the Bridleway boundary with the building being set further west to potentially reduce impact on the Bridleway. Additional vehicular movements on the Bridleway should not harm public users of this bridleway and enhancements such as segregation for users or an appropriate surfacing should be secured.

Mitigation measures within supporting ecological assessment should be secured via condition to protect the Worthing and Hill Barn Golf Course Site of Nature Conservation Importance behind the site. The proposal should be reviewed by the Councils Ecologist to identify any further mitigation.

Consideration should be given to the International Dark Night Skies Reserve, and dark night skies, which are a special quality of the Park. External lighting should be designed to protect this and conform to the Institute of Lighting Professionals guidance, ideally achieving zero upward light and sensitive to bats and other wildlife.

Southern Water Services: No objection and they confirm they can provide water supply and foul sewage disposal for the site.

Conditions and informatives are recommended, including:

- Details of foul and surface water drainage to be approved in consultation with Southern Water,
- Proposed soak-aways should be appropriate, design of the proposed basements and on-site drainage system should consider impact on the public sewerage system.
- Arrangements should be made for management of proposed (SuDS) drainage,
- Separate consent also needed for new water and sewer connections.
- Refer to the Environment Agency for the protection of groundwater which is important to public water supply.

Environment Agency: Awaited

Waste Management: Comments

Appears to be adequate space for refuse service access but need to ensure Bridleway surface can accommodate 20 tonne vehicles to ensure it remains in good condition for other public users.

Public Representations

A total of 9 representations have been received from the occupiers of Hillside Avenue, Warren Road, Cote Street and Beeches Avenue. Of these 8 raise objections and one is a letter of comment.

The objections relate to:

- Over intensive and overdevelopment of the site taking into account the excessive massing, inappropriate bulky design and form that would not harmonise with the surrounding scale of existing dwellings and would be harmful to the character and appearance of the area.
- Adverse impact on the neighbouring residential amenity by way of increased noise and disturbance from the construction process and long term operation of the care home with associated vehicle movements (including servicing vehicles, staff, and visitors) along the public bridleway, taking into account cumulative noise impacts from the A27. Further impacts would also occur including loss of light, outlook and privacy, and overshadowing and overbearing impact due to height and position of the proposal (particularly in relation to immediate neighbours east and west).
- Insufficient off-road car parking provision resulting in increased on-street parking demand, including on private roads where controls are not in force and the Bridleway itself where it meets the junction of the A27 with potentially increased conflict between vehicular traffic and pedestrian users, to the detriment of highway safety.
- Adverse impact on the A27 through increased traffic generation taking into account cumulative impacts.
- Increased local air pollution taking into account cumulative impacts.
- The proposed description of development refers to construction of 2.5 storey care home whereas the plans actually show a 3.5 storey building plus higher 'watchtower'.
- Previous proposal was for a 60no bed car home with this proposal representing an excessive 33% increase in rooms.
- Insufficient supporting information in relation to proposed number of staff e.g. admin, managerial, nursing, nursing assistants, health care assistants, chiropodists, therapists, hairdressers, catering , laundry, building and garden maintenance, supplies delivery, staff and residents' minibus driver.
- Insufficient external amenity space for future occupiers and visitors.
- Harm to the rural edge setting of the South Downs National Park and the Bridleway due to the overdevelopment of the site taking into account its 4-storey scale and height in close proximity to the boundaries of the site, as well increased traffic along the Bridleway detracting from its use by the general public.
- Previous reasons for refusal are still applicable and not overcome by this revised proposal.

- Proposal would set an undesirable precedent for outsized commercial buildings along Warren Road, completely altering the nature of this residential area.

The letter of comment indicates:

- The principal access from/to Warren Road seems to be via the existing 108 plot which is located quite near to the top of the hill; this may cause problems, especially when turning right, either exiting from the new dwelling or entering from Warren Road into the new dwelling. The former would involve crossing the busy Warren Road to go up the hill with traffic potentially travelling at 40 mph.
- The same applies when approaching the dwelling from Grove Lodge roundabout, to turn right into the new dwelling means crossing the busy traffic coming down the hill. The plan shows a fairly tight slip road at right angles to Warren Road.
- Access is understood to be available from the existing 106 via the parking area; hopefully this does not affect the public footpath and provisional parking facilities that currently exist for runners and dog walkers prior to enjoying their exercise up the Downs.

Other comments within the objection letters:

- Recognise that the north side of the proposed building will be set much further back compared with the previous application.
- Appreciate the designers have attempted to take into consideration the slope of the site and that the plans show it will be no higher than 108 Warren Road.
- Existing tree and soft landscaping buffers around the boundaries of the site need to be protected.
- Both of the properties that would require demolition have been occupied constantly during the 27 years, they are highly desirable & will continue to be so when this proposal is rejected.
- The proposal is more financially lucrative than retaining the houses as existing within the site.
- A scheme with scale and form comparable to existing properties would be more acceptable, would preserve neighbouring residential amenity and the visual amenity of the area and would create a higher quality living environment for future occupiers.
- Proposal would result in the devaluation of adjacent dwellings.

Relevant Planning Policies and 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.

Worthing Core Strategy 2006-2026 (WBC 2011): Strategic Objective 1, Policies 8, 9, 12, 13, 15, 16, 17, 18 & 19

Worthing Local Plan (WBC 2003) (saved policies): H18, TR9
SPD 'Space Standards' (WBC 2012))
SPD 'Developer Contributions' (WBC 2015))
SPD 'Guide to Residential Development' (WBC 2013)
WSCC Parking Standards (2019)
National Planning Policy Framework 2019 (NPPF)
National Planning Practice Guidance

The policy context consists of the NPPF and the local development plan which comprises the saved policies of the Worthing Local Plan, and the Worthing Core Strategy (2011). National planning policy contained in the revised NPPF post-dates the adoption of the Core Strategy. Paragraph 11 identifies at the heart of the NPPF a presumption in favour of sustainable development. For decision-making this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.

Paragraph 73 of the revised NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against local housing need where the strategic policies are more than five years old. The housing requirement set out in policy 7 of the Core Strategy is more than 5 years old. An assessment of local housing need has been undertaken as part of the new Worthing Local Plan, but the latter is still at a very early stage and has no formal status in the determination of planning applications. The Strategic Housing Market Assessment, 2019 (SHMA) which will inform the next stages of the Local Plan process, is referred to in the planning assessment below.

Planning Assessment

The main issues raised by this proposal include:-

- Principle of Development;
- Design and Context
- Residential Amenity
- Highways Matters
- Trees, Landscape and Biodiversity
- Drainage and Flood-Risk

Principle of development

The site is within but at the edge of the built-up area, where the principle of redevelopment is acceptable under Policy 13, subject to detailed considerations such as those under Policy 16, which requires good quality design, preservation of the character and heritage of the area, response to important aspects of local character and exploiting of all reasonable opportunities for enhancement. Development, including intensification, should not result in unacceptable reduction in the amenities of local residents (Saved Policy H18). Other detailed policies such as transport and sustainability, are considered in later sections of this report.

Policy 9 allows for the loss of a dwelling if loss would facilitate the delivery of a much needed community use. Policy 8 seeks to deliver a wide choice of high quality homes to address the needs of the community. The supporting text (paragraph 7.13) makes clear that it is important that accessible and adaptable accommodation is provided for everyone including older people, and people with a temporary or permanent physical impairment.

The Council's recent Strategic Housing Market Assessment, 2020 (SHMA), estimates a future requirement for 435 additional care-bed spaces in the Borough for the period up to 2036. The current proposal would make a significant 18 percent contribution to this. The NPPF supports care home provision as part of overall housing supply and notes that this may also allow other housing to be re-used by other households. Accordingly there is no in-principle objection to the loss of the 2 existing dwellings within the site and their replacement by a modern care home of substantial capacity to help meet a very particular type of acknowledged local housing need.

Sustainability & Energy

The proposal is intended to address the emerging energy performance policy requirements of policies CP17 (Sustainable Design) and CP18 (Energy) of the Worthing Draft Plan. The current renewables target is a minimum 10% saving in CO2 with the proposal seeking to achieve a minimum of 15%.

According to the sustainability-energy statement submitted with the application following measures could be incorporated into the scheme at the technical design stage:

- Energy efficient building fabric (including air tightness)
- Energy efficient LED internal and external lighting
- Advance heating control systems
- Energy efficient appliances
- Water usage below 105 litres per person per day
- Waste minimisation and recycling strategy
- Use of sustainable building materials
- Combined Heat and Power (CHP) systems using low carbon fuels
- Air Source Heat Pump (ASHP) systems (heating/cooling)
- Ground source heat pumps
- Solar and photovoltaic (PV) systems
- Solar thermal systems
- Electric. car charging points

Whilst this list contains several measures which are covered by Building Regulations, the proposal could meet emerging energy performance policy requirements and exceed the current policy 10%. A planning condition would require the final details of the above measures, in accordance with the sustainability objectives of Core Strategy Policies 16, 17, 18, Draft Local Plan Policies CP17, CP18, guidance within the SPD Residential Development and the NPPF.

For these reasons, and subject to the detailed consideration set out below, the proposed development is considered acceptable in principle.

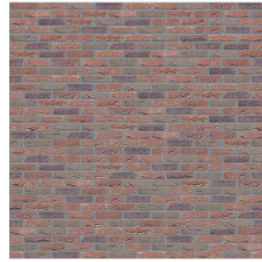
Design and Context

In terms of overall size and form the proposed building would be between 0.5m and 4.5m taller than the existing house at no. 106 and much wider. As such it would become the largest building in Warren Road, with the flats at Buckingham Court of 32m width being the next widest building, and only half the width of the proposal. Great care is required to ensure that redevelopment is respectful of the distinctiveness of Warren Road and the Offington context, including the architectural richness of buildings and their spacious and tree-lined character.

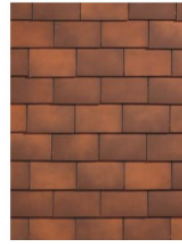
The design incorporates traditional pitched and hipped-roof forms. The central core of the building is characterized by a pair of projecting gables on the south (front) and western side elevations and a tower feature and substantial and detailed chimney stacks to give a varied roofline. The lower subservient wings projecting eastward and westward from gables and are simpler in style, using dormers with simple flat and molded roofs. Facades comprise a mixture of window sizes but using consistent and traditional proportions and divisions. The series of masses and varied levels are in response to the site contours, discussed further below.



External materials and detailing are of brickwork using red tones with feature brickwork around openings. Corner quoins & bands are used to distinguish the central core which contains the main entrance on the western elevation. Tile-hanging over facing brickwork or brickwork only is proposed to give a simpler character to the subservient wings. The roof would be of plain tiles articulated by the dormer windows. The variety of window sizes and openings have been provided to differentiate elements of the building and to reflect local architectural styles but also to avoid repetition or institutional appearance).



Palette of Materials



EXAMPLE CONTRASTING QUOINS/OPENING SURROUNDS



BRICKWORK DETAILING SAMPLE:



WINDOW SAMPLE:
Black aluminium



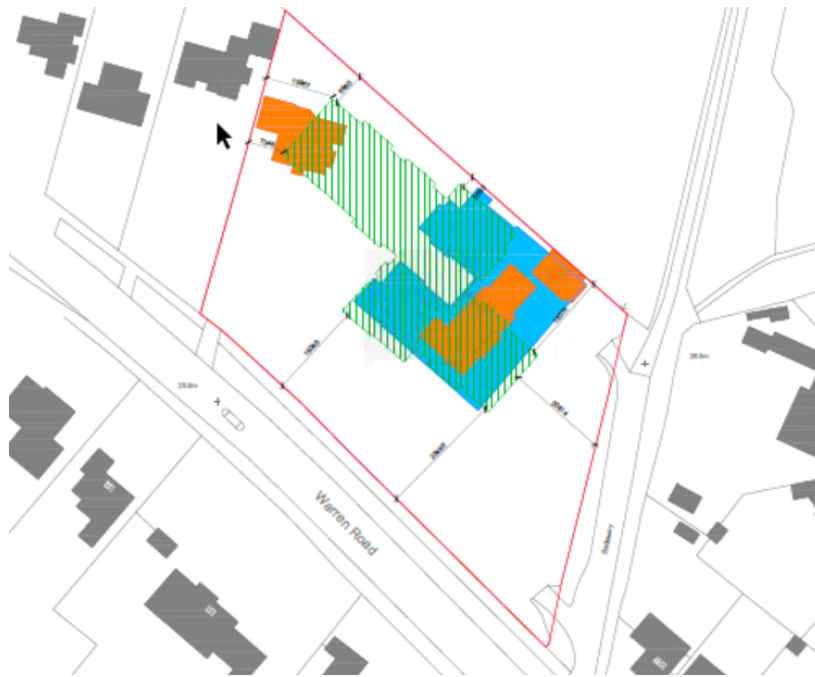
The applicant has asked that consideration also be given to the enlargement of some of the proposed balconies. Simultaneously the Council's Design & Conservation Officer has suggested a review of some of the proposed quoins and decorative bands. This may also include localised changes to the upper part of the proposed tower. An update will be given, including any amended plan received.

In consideration of size, mass and context, the previous building using a substantial and quite unrelenting four storey form, was considered to be excessive in size and mass which in combination with its position in a relatively exposed eastern part of the site created an excessively built up appearance.



The image above shows a comparison between the current proposal elevations in black, the existing buildings in orange and the previously refused scheme in blue. The comparative layout plan below also shows the positions and footprints of the current proposal and the refused scheme, (the proposal is hatched in green).

In the refused scheme the long four-storey roofline created an unrelenting mass at the lowest part of the site. This gave rise to an abrupt change in scale compared with other two storey buildings in the street, discordant with the established rhythm of buildings incrementally which step upslope gradually with the rising contours. Located at the most visible part of the site, its impact was particularly pronounced.



The current proposal takes a very different approach to its context. Firstly, it uses a composite form of three elements; the central core and two wings. The tallest part of the building is located in the centre of the enlarged site and strides a proposed change in ground level, and then quickly steps down to the lower wings. This overcomes both the problem of uniform massing of the previous scheme and the relationship of the building site contours. The central core is punctuated by the relatively modest projection of the tower, which serves as a focal point from which the core and its wings descend in well portioned steps.

In plan form the western wing is located deep to the rear of the enlarged site, well away from the frontage. The eastern wing is further forward but to a marked extent it overlaps the footprint of the existing house; where it projects 8m further eastwards than the existing, its height is stepped again down to 10m, which is slightly taller than the existing 9.6m of the existing house but much lower than that of the refused scheme.

In terms of space, the proposal retains approximately 35% unbuilt frontage to Warren Road and approx. 40% to the Bridleway. These spaces are distributed around the building, retaining trees and allowing for new planting to retain its heavily vegetated character. At the much less visible northern side of the site, where the building would come closest to the boundary, its footprint is stepped deeply such that the impact where visible from the bridleway, is considered to be a modest one. The proportions of space and mass are considered to be well balanced and in keeping with the context of the Offington area.

Heritage

The existing Neo-Georgian-style house at no.106 dates from the inter-war period. Its rendered exterior and simple glazing gives the building an ordered but perhaps somewhat bland appearance. Previously an initial heritage assessment examined both the interiors and exteriors, noting the building and coach-house to be of relatively unexceptional design, lacking the craftsmanship, group value and historical association

which characterises other parts of the Offington estate, such as those opposite on the southern side of the A27 Warren Road. Neither is it suggested to be by an architect of particular note.

The existing house at no.108 is a simple but symmetrical interwar white-rendered villa-style house. It is characterised by a pair of deep and distinctive ground floor windows around a central entrance and a series of three smaller windows at first floor. A side bay has banded rendering and the deep overhanging main roof is punctuated by a symmetrical pair of simply banded chimneys. Whilst, the building is not locally listed, it contributes to the bespoke architectural character of the Offington area.

The southern boundary wall of both nos. 106 & 108 is of lime and flint. This is characteristic of the local area and possibly pre-dates the houses. This has local interest, characterising parts of Offington and the A27 frontage, and is worthy of retention in any redevelopment, and could be sought by use of a planning condition.

In Archaeological terms the site is considered unlikely to hold any interest and the County Archaeologist raises no objection.

Residential amenities

For prospective residents, the proposal would provide 82 care rooms, typically 24-26sqm, including en-suites. Each has an outdoor view to gardens of woodland and some have balconies or a small patio. There are communal dining rooms, lounges and nursing stations on each floor, a hairdressers and café area are indicated at ground floor.

A noise assessment has identified that noise recommended noise levels from external sound (such as traffic), is likely to be adequately managed through acoustic glazing and passive ventilation (e.g. trickle vents). If subsequently mechanical ventilation and higher acoustic insulation were to be required, details can be dealt with by condition, as recommended by the Environmental Health Officer. This would ensure that an effective system also considers heating and cooling, (such as by a mechanical ventilation and heat recovery MVHR system), and that this also is maintained to ensure no arising outward noise from any plant, and to allow consideration of any visual impact.

In terms of outdoor amenities a variety of lawns and seating areas, including an outdoor social area to the east are proposed with level pathways. Detailed planting provides for a range of visual and fragrant garden areas. The applicant's recent request to include first floor balconies on the south façade of the main core will increase outdoor amenity, subject to achieving satisfactory design. It is unlikely that this will impact additionally upon existing neighbours, given the distance. However, a site management plan is recommended in order to ensure that use of outdoor areas and the building generally, (such as sound from within), is managed to minimise impact upon neighbours. A planning condition is recommended to secure this.

External lighting would also be subject of a planning condition, in the interests of residential amenities, to minimise light pollution, mindful of the National Park Dark Skies Reserve, and in the interest of ecology, for instance to minimise impact on bat foraging.

The kitchen, laundry and plant areas are located in the lower ground floor of the west wing, although servicing would also from the Warren Road access via the bridleway. It is

considered important to limit hours of deliveries to avoid noise and disturbance from delivery vehicles in the bridleway or main access outside normal daytime hours and a slightly greater limitation at weekends. Details of ventilation, including acoustic performance of air extractors, and measures to limit odour, can also be required by condition, together with ongoing maintenance arrangements for these.

In consideration of neighbouring privacy and amenities, it is noted that the proposed building would be located between 8m – 14m from the house immediately to the west (no.104 Warren Road). The height of the proposed building, with two storey eaves and dormer window in its roof is considered unlikely to have any greater impact (and probably less) on this neighbour. Side facing windows at first floor and above are to corridors or are secondary windows. A planning condition can require obscure glass and limit opening to safeguard neighbouring privacy.

Part of the new parking area in front of the proposed western wing would be 16m from the front corner of no.104, but partly shielded by the angled corner of the proposed building. A buffer of 2m and more along the western boundary with additional tree and shrub planting would provide a visual screen. The use of the recommended delivery hours' planning condition would limit the risk of noise outside normal hours.

To the east the closest part of the proposed building would be approximately 8m further forward (eastward) of the existing house. This would be approx. 28m from the rear boundary of the rear garden to 15 Hillside Avenue to the east of the bridleway. Currently the existing house is visible from the neighbouring garden, terrace and rear rooms although lines of sight are currently quite widely filtered by trees in summertime. As such part of the first floor windows are glimpsed in places and dormer windows are visible to varying extents, although it is considered that they could be regarded as intrusive and the garden area is generally very well secluded. Wintertime views give a much clearer line of sight to these windows.

The proposal, forward of the existing building, would contain three windows, variously to a bedroom (secondary window), a corridor and a stairwell. A dormer window would light a second floor corridor. It is probable that some lines of sight will be greater from these windows than from the existing windows.

Given the distances of approx. 28m to the neighbouring garden and 50m to the house, the weight to be attached to this impact is a matter of judgement. It would be possible to use a planning condition for obscure glazing and to limit opening to a top light only, which would remove any risk of greater impact. Another option would be to use partial obscure glass, up to 1.7m, which would retain skyline views from within the building and this is considered to strike a fair balance. A condition is recommended accordingly.

The proposed northern wing containing 2nd and 3rd floor windows (five bedrooms and a quiet area) would be visible from the rear of the neighbouring house, most notably its first floor terrace but this is shown to be recessed by 16m from the proposed eastern wing (i.e. 8m deeper than the façade of the existing house). In light of this distance combined with the partial filtering by trees, it is not considered that significant weight could be attached to this impact. It is noted that the distance and size of the proposed building is unlikely to give rise to loss of light or an overbearing effect.

Use of the bridleway to access the eastern side of the site, where six parking spaces, a refuse store are shown, could give rise to some degree of noise, particularly from servicing vehicles. It is recognised that this is an existing access but in light of the potential greater use it would receive, it is considered reasonable to control hours for deliveries, as already mentioned, in the interests of managing risk of noise and disturbance.

To the south of the site, residents on the southern side of Warren Road are considered to be sufficiently distant as to not be adversely affected in terms of light, privacy or visual impact. Vehicle movements to and from the site are also unlikely to be discernible in terms of noise from other road traffic.

Air Quality

Following consideration of the applicant's air quality impact assessment, the Environmental Health officer has confirmed that a payment of £7,796 should be provided towards local air quality improvement schemes. This can be collected as part of any planning permission. Legal advice has been sought as to the simplest mechanism for securing this, given that no other legal agreement requirements are likely to pertain to this application.

Also in terms of air quality, charging points will be provided for electric vehicles. The percentage should reflect current requirements for the County Parking Standards, currently 28%. The remaining spaces are to be cabled for future charging points. A planning condition can secure this.

Contamination

It is noted that the site is not within or close to any known source of land contamination and was not a point of concern in the previously refused application. Further advice has been sought from the Environmental Health officer following the recent consultation response but it is likely that a standard precautionary approach condition can be used.

Highway Matters

Traffic Impact

As set out above, the previous application for a 60 bed care home on the smaller site was refused on the grounds of insufficient highways information including impact on the Bridleway and Warren Road (A27). By contrast the County Highway Authority is now satisfied with the information provided in relation to predicted traffic and along with Highways England, which is responsible for the A27; it has requested the submission of a Road Safety Audit, which the applicant's consultant is preparing in liaison with these Highway Authorities.

It is anticipated that the proposal would generate 9 two-way vehicle movements in the am peak and 10 two-movements in the pm peak WSCC Highways and Highways England have assessed this information and through interrogation of the data and consideration of travel patterns of existing staff members, conclude the proposal would not lead to a significant increase in traffic on the local highway network.

Accessibility

The site is located approximately 1 kilometre from a local centre and benefits from links to public transport, with bus services in Warren Road and Broadwater Road & Upper Brighton Road to the south. It is considered that these public transport modes linked with the good pedestrian leading to the site would offer realistic alternatives to the private car for visitors and staff of the site to travel by sustainable modes of transport.

Proposed Access Arrangements – main access to Warren Road

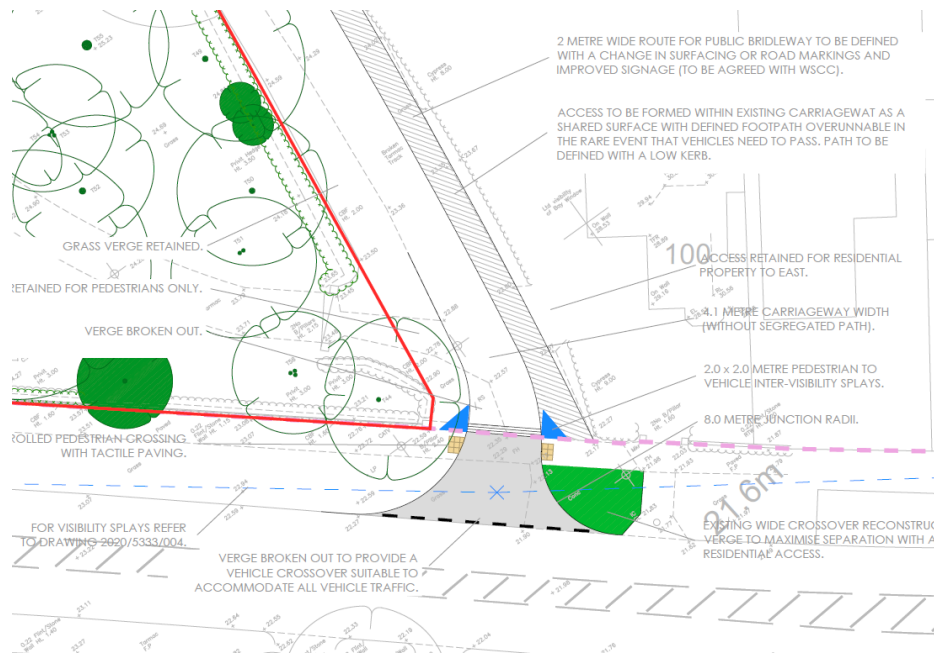
The existing main access at 108 Warren Road would be widened from 3.5m to 6m (as shown below) and its angle changed to create a straighter internal driveway and allow for 2-way vehicle movements. A 1.8m pedestrian footway is also proposed within the site, although an amended plan has been requested to remove this where possible deeper into the site, to allow a shared surface and greater planting space.

Other elements include new tactile paving and rumble strips to slow vehicles. A 2m pedestrian visibility splay would remove and rebuild a short section of the flint boundary wall and adequate visibility is provided across the roadside grass verges. of 120m. The access would lead to the main, 21-space, staff and visitor car park as shown below.



Proposed access arrangements – junction with Warren Road

The proposed service access into the site would be via the Bridleway which is accessed from Warren Road (below). The intention is to upgrade the Bridleway to ensure it can accommodate the additional vehicle movements (including service vehicles), while ensuring safe access for other properties served off the access way, and public users such as pedestrians, horse riders, cyclists, etc.

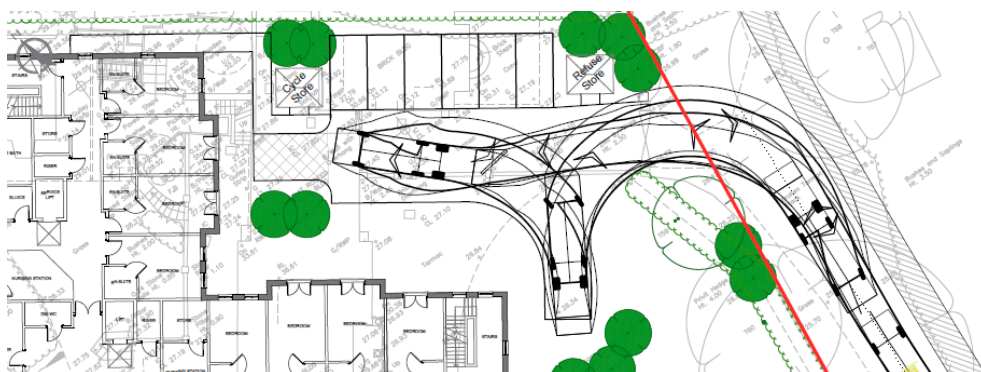


Proposed access arrangements – service access from the Bridleway

Whilst additional highways information is awaited, as illustrated below, one approach is to provide re-surfaced vehicle crossover to Warren Road, with the Bridleway being re-organised to provide a 4.1m wide strip for vehicles and a pedestrian route alongside with new signage highlighting presence of pedestrians. The grassed verge to the western side of the Bridleway would be retained. This would affect vegetation on the east side and care would be needed to retain a large TPO holly.

The design uncertainty of this access was a related part of the previous highway-based reason for refusal. Further comments are awaited from the County Rights of Way team in respect of the current approach. It is also recognised that a balance is needed between technical highways requirements whilst ensuring the character and appearance of the Bridleway, which forms part of an important and well used rural edge. In this respect it is anticipated that the Rights of Way team would not want to constrain the width of the bridleway as indicated above but look for a shared access with appropriate surfacing. The service access is not likely to be heavily used and therefore a shared access before the bridleway narrows as it leads northwards may be acceptable.

Within the site the north-east corner (which currently comprises rough and hard surfacing serving the existing coach house) would be re-planned to facilitate service access and provide 6 further staff parking. (below)



The access arrangements have been considered by the County Highway Authority and Highways England who raise no objection in principle, subject to a satisfactory Road Safety Audit, as requested. The results are expected shortly and an update will be provided.

The applicant has also submitted a 'Walking, Cycling & Horse-riding Assessment (WCHAR)' which provides an independent assessment of local pedestrian, cycle and horse-riding infrastructure and recommends 'opportunities' to improve these facilities. Whilst a WCHAR is not strictly required for this 'Small Highway Scheme' and would typically be undertaken at the detailed design stage, the applicant has prepared this to ensure that any suggested opportunities for enhancement to pedestrian and cycle infrastructure have been considered at this stage.

The WCHAR suggests potential enhancements to the Bridleway to prevent ad-hoc car parking, lighting to assist cyclists, enhanced visibility splays, dropped kerb to allow disabled access into the site from the Warren Road access way, tactile paving for pedestrians around crossing points, improvements to the existing footway along the northern side of the A27, bus stops and cycling infrastructure in consultation with Highways England. Further consultation responses from WSCC Highways and Highways England are awaited in respect of this additional information.

Parking Provision and Travel Plan

The 27 car parking spaces, 2 of which would be for wheelchair users, are considered to meet the requirements of the development taking into account staff shift patterns, in accordance with current County Parking Guidance. Live electric vehicle charging would be provided to meet County requirements, with 100% of spaces cabled for future additions.

A total of four cycle spaces are proposed in a cycle store to the east of the site. However, this is based on historic surveys rather than aims to promote increased further use, mindful of the estimated number of staff (10 full time and 20 part time). A greater number has been requested.

A Travel Plan is proposed. In this case a fairly narrow range of elements are considered to be proportionate to the scale and nature of the development. These are as follows:

- Secure and covered cycle parking on site for staff and visitors;
- Individual lockers and shower and changing facilities for staff;
- Travel information boards in communal areas for staff and visitors, including travel information such as bus and rail timetables, walking and cycling routes, local car clubs and car sharing options.

A planning condition can require implementation of this plan.

Summary

Subject to satisfactory information being provided to address the requirements of the Highways Agency and WSCC Highways, and additional secure cycle provision and

taking into account any cumulative impacts, the proposal is unlikely to have an adverse impact on highway safety and the free flow of traffic within the local highways infrastructure. Highways England has requested a Construction Management Plan, which would assist in managing matters such as delivery times and loading arrangements during the development period.

An appropriate design solution which balances the need for safe vehicular use alongside other users of the bridleway, and retains its informal character as far as possible, remains under discussion. An update will be given.

Subject to conclusion of these matters and satisfactory secure cycle parking provision the proposal would accord with the requirement of Core Strategy Policies 12, 19, Local Plan Policy TR9 and the National Planning Policy Framework.

Trees, Landscape and Biodiversity

The combined site contains at least 50 individual and 6 grouped trees. These contribute greatly to the heavily vegetated character of the site, including the large roadside trees. Many of the trees on site are subject to a tree preservation order (TPO). To the rear (north) is the woodland edge of the golf course, which adds greatly to this wooded character, as can be seen from the bridleway.

The proposal retains all frontage trees to Warren Road and the bridleway (one in poor condition recently fell over and has been removed). Ten additional trees are proposed along the site frontages, comprising lime, maple, cherry and liriiodendron trees, which are in keeping with the type and ultimate stature of existing trees and will occupy existing gaps.

A cluster of trees including a large mature Red Oak, Purple Beech and Maple, in the centre of the site, together with a cluster of slender and smaller mixed trees, would be removed in order to allow for the proposed development. As indicated by the Council's Landscape and Tree Officer the loss of the Red Oak and Beech trees is regrettable but it has not proven possible to find an alternative arrangement for parking to enable these trees to be retained. However, these removals are very unlikely to affect public views of the site, due to the presence of larger frontage trees which would remain. The proposed additional planting along frontages and elsewhere within the site, would outweigh the losses in terms of number and can be seen as renewal of tree stock on the site.

The application contains detailed measures for protection of the trees during development, including the land lowering proposed for the centre of the site. An initiation meeting is proposed, which the Council's tree officer would be invited to attend. The applicant's tree advisor would attend the site at key stages during the works. This can be reflected in a planning condition.

One remaining tree-related matter is the matter of surface water drainage, which is currently the subject to further discussion with the Council's Engineer. It will be important to ensure that tree and root protection is included in the design, particularly if underground soak-aways or tanks are proposed. An arboricultural assessment will be sought on the eventual proposals. An update will be given and it is envisaged that a planning condition could be used.

Biodiversity

The application is supported by an ecological assessment which concludes that the development can proceed with minimal impact to habitats and protected / notable species subject to appropriate mitigation measures are secured, and any measures arising from the further surveys, are implemented.

Based on a confirmed bat presence within the site, the ecologist's report recommends further surveys. Following their completion, a bat mitigation strategy will be produced and submitted to the Council. The report provides further recommendations in respect of birds, hedgehogs and enhancements to the site including the planting of a native hedgerow and the installation of bird boxes. Further information is awaited and updates will be provided.

Subject to satisfactory ecological information being provided, along with planning conditions to mitigate the impact of the development and to secure appropriate enhancements, the proposal would with the provisions of Policy 13 and the NPPF.

Drainage and Flood-Risk

The application is supported by a Flood Risk Assessment which has considered the potential risk of flooding for all sources and has concluded that these are low. The report explains that the existing surface water discharge to the Southern Water foul sewer main is located on Warren Road would be terminated, with the proposed development surface water drainage being discharged to a combination of soakaways on site and permeable paving to the car parking areas. The foul sewer connection would be maintained for the discharge of foul water only from the new development.

The Borough Drainage Engineer has considered these proposals and confirms its low at flood risk status. Recent further information confirms that there is sufficient space for two underground tanks to be constructed if ground infiltration capacity limits the capacity for ground infiltration of surface water (further winter surveys are needed to test this). A planning condition can require final drainage design details once the winter survey information is provided. Confirmation is needed that drainage designs would not harm trees or their roots.

Summary

The proposal would make a substantial contribution to meeting identified residential care needs. The site is of sufficient size to accommodate development of this scale and associated parking and servicing in a manner which safeguards the appearance and character of the site. Inevitably the scale of building would be greater than surrounding development and would involve the loss of a small number of mature trees within the interior of the site, it would also demolish two houses, one of which (no 108), is considered to have some architectural merit.

However, in considering the benefits of providing the type of accommodation proposed here, it is considered that the balance of merits falls in favour of the proposal. Mindful of

this and of the importance of safeguarding the important character of the area, and this prominent site, it is recommended that demolition should only take place once there is a contract for implementation of the care home development. A benefit of this approach is that it will also minimise the risk and duration of a gap site and hoarding.

A design solution for the bridleway will emerge from further discussion with the County Council, including consideration of maintenance implications. This is to ensure an arrangement which is safe and functional for all users and which in aesthetic terms, retains the informal rural character and vegetation as far as possible, which is important for users and neighbours.

Conditions for the management of the site, including the use of outdoor spaces and delivery hours, external plant such as air moving equipment) as well as some extent of obscure, fixed glazing, are also recommended. These would achieve a balance between user needs with neighbouring amenities.

In wider landscape terms the development is unlikely to have an adverse impact, particularly given the extent of tree cover within and surrounding the site, and the extent of other development locally against which the new roofscape would be seen.

For some matters, details are awaited including an ecology update; the relationship of trees to drainage and increased cycle parking & storage but hitherto it appears that these matters can be adequately reconciled. Comments of the Highway Authorities are awaited in respect of the road safety audit. Provision of an air mitigation payment can be achieved by a simple s.106 provision

In conclusion, the application can be supported, subject to the resolution of these awaited matters, a satisfactory design approach for the bridleway, satisfactory comments from relevant consultees (including Highway Authorities – County Council/Highways England & Rights of Way; Tree officer & Environmental Health) and completion of a simple s.106 provision. Having taken account of all the relevant planning policy considerations and other material considerations set out above, it is considered that the proposed development would comply with the development plan when considered as a whole, subject to conditions, and is therefore recommended for approval.

Recommendation

It is recommended that the decision to grant planning permission be delegated to the Head of Planning subject to the receipt of satisfactory additional and amended material referred to in this report and satisfactory comments of consultees including the Highway & Rights Of Way Authority, Highways England; Environmental Health and the Tree Officer; the completion of a planning obligation (s106) and subject to the following conditions (and any further appropriate conditions):

** Asterisk denotes 'pre-commencement' conditions. Some matters such as the submission of materials, are to be settled 'before works above ground or slab level'*

Conditions

1. Standard 3 year time limit
2. Approved Plans
3. No demolition before contract for care home redevelopment secured*
4. Class C2 Care Home use only
5. 1:20 plans of building details
6. Materials to be approved
7. Means of enclosure, including retained boundary flint wall
8. Landscaping implementation of planting – details of internal hard surfaces and retaining wall and railing to be approved
9. Design details of bridleway to be approved
10. Provision of accesses
11. Provision of parking & manoeuvring (including EV charging & cables & cycles)
12. Implement Travel Plan
13. Hours for deliveries
14. Care home management plan to be approved
15. External plant or equipment, including acoustic/odour performance - details for approval
16. Obscure and fixed glazing (to 1.7m above floor level)
17. External lighting, details to be approved
18. Drainage: detailed proposals: surface (SuDS and management) and foul water
19. Drainage: post installation verification
20. Sustainable energy – detailed to be approved
21. Biodiversity measures to be implemented
22. Noise mitigation and ventilation measures – approval if additional provisions made
23. Construction and Environment Management Plan*
24. Hours of development works/construction*
25. Implementation of tree protection*
26. Contamination – precautionary approach during development

22nd July 2020

Local Government Act 1972

Background Papers:

As referred to in individual application reports

Contact Officer:

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Portland House
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stephen.cantwell@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.