



ECE Planning

Planning, Design, Access and Transport Statement

Courtlands,
Parklands Avenue

May 2026



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Project Name: Courtlands, Parklands Avenue

Location Courtlands, Parklands Avenue, Worthing,
West Sussex, BN12 4NG

Client: Courtlands By The Sea Ltd

File Reference: P1818iii

Issue	Date	Author	Checked	Notes
PL1	06.05.2026	R Hoad	C Barker	Initial Draft
PL2	19.05.2026	R Hoad	C Barker	Client Issue

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1. Introduction

- 1.1. This Planning, Design, Access & Transport Statement has been prepared on behalf of **Courtlands By The Sea Ltd** in support of a full planning application and associated Listed Building Consent application at Courtlands, 37 Parklands Avenue, Worthing.
- 1.2. The application follows pre-application discussions with Worthing Borough Council (Ref: PREAPP/0152/25) and responds directly to the written advice dated 5 January 2026. The Council advised that, rather than pursuing amendments under Sections 96a and 73 of the Town and Country Planning Act 1990, a single comprehensive full planning application should be submitted to capture all proposed operational and physical changes at the site, including retrospective works.
- 1.3. Planning permission (Ref: AWDM/2234/21) and Listed Building Consent (Ref: AWDM/2235/21) were granted on 1 September 2022 for the change of use of the site from offices to a care/school facility with overnight accommodation (Class C2), together with associated works.
- 1.4. Since opening in 2023, the site has operated successfully as Courtlands Independent Special School, a day school provision. The approved overnight accommodation has not been implemented, and the facility has operated solely as a non-residential specialist school.
- 1.5. This application therefore seeks:
 - Change of use from a care/school facility with overnight accommodation (Class C2) to a Special Educational Needs (SEN) School (Class F1) for up to 80 pupils;
 - Removal of the previously approved overnight accommodation from the scheme;
 - Retention of two replacement outbuildings (retrospective sheds);
 - Erection of additional lodge-style classroom buildings within the grounds;
 - Installation of a modest Multi-Use Games Area (MUGA);
 - Associated internal and external works.
- 1.6. The development description comprises the following:

"Change of use of the site from a care/school facility with overnight accommodation (Class C2) (approved under reference AWDM/2234/21 and AWDM/2235/21) to a Special Educational Needs (SEN) School (Class F1) for up to 80 pupils, including the removal of previously approved overnight accommodation, retention of two replacement outbuildings (retrospective sheds), erection of lodge-style classroom buildings, installation of a Multi-Use Games Area (MUGA), and associated internal and external works."
- 1.7. The applicant remains the same as under the previous approvals.
- 1.8. This Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the relevant planning history, relevant planning policy, details of the proposed development and an assessment of the relevant planning and heritage considerations.
- 1.9. This statement should be read alongside the following submitted documents and drawings:
 - Planning Application Forms and CIL Forms;

- Educational and Operational Justification Document prepared by Courtlands Independent Special School
- Suite of Architectural Plans including Location Plan and Block Plan
- Heritage Statement and Statement of Significance;
- Arboricultural Impact Assessment & Method Statement and Tree Protection Plan;
- Preliminary Ecological Appraisal and Biodiversity Gain State;
- Flood Risk Assessment and Drainage Strategy.

2. The Site

- 2.1. Courtlands is located in a sustainable location within walking distance from shops and services ('Goring Road' shopping parade and 'the Mulberry' shopping parade) and Durrington-by-Sea train station. The A259 is located a short distance to the north with numerous bus stops linking the site with Worthing to the east and Littlehampton to the west. Worthing Town Centre is less than 3 km to the east.
- 2.2. The site itself consists of Courtlands Independent Special School, a day school provision, which opened in 2023 following planning consent for the change of use from offices (Use Class E) to a care / school facility. This is discussed in further detail in the Planning History section of this Statement.
- 2.3. For the avoidance of doubt, the southern section of the site comprising the lake does not form part of the 'change of use' area and the 'developable area' and 'site boundary' have been noted on the drawings, consistent with the previously approved application under reference AWDM/2234/21.
- 2.4. Courtlands is located within a predominantly suburban residential area characterised by detached and semi-detached properties. The site contains established boundaries comprising hedgerow and mature trees. TPOs are located within the northern section of the site, close to the existing building.
- 2.5. The Government's Flood Maps for Planning have been reviewed and reveal that the site is situated within Flood Zone 1 which means that the land and property have a low probability of flooding. The site is subject to some minor surface water flooding which is discussed in further detail within the accompanying Flood Risk Assessment and Drainage Strategy.

Heritage Assets

- 2.6. Five Grade II listed structures are recorded on the site (including the main building itself) as follows:
 - Courtlands Hospital
 - Garden Archway at Courtlands, South West Formal Garden
 - Balustraded Terrace to the Rear of the House at Courtlands
 - Sundial situated to the east of Courtlands House
 - Gazebo at Courtlands to the East of the House
- 2.7. Of most significance is the listing of Courtlands (listed under Courtlands Hospital). The listing notes the following:

'TQ 10 SW PARKLANDS AVENUE (West side), West Worthing 24/90 Courtlands Hospital 23.7.74 II Originally house, later hospital. Early C19 reworked in early C20. Brick with stone dressings and slate roof with brick chimneystacks. A large rambling 2 and 3 storeyed building, greatly altered and added to and possibly with an older core. The North front has a columned porch. The pilasters and iron-work on the south front are said to be re-used Adam features. The East front has a projecting bay on columns. The interior was re-furnished in the early C20 and has reused C18 features. The iron balustraded staircase is said to be by Adam and the hall has plasterwork in the Adam style, there is a C20 marble floor and C18 marble fireplace with panel of cherubs, alternate glyphs and paterae, corner urns and fluted pilasters. There is a painted glass dome in the Adam style said to have come from the 1788 Cordwainers Hall, No 7 Cannon Street in the City of London on its demolition in 1909 but most likely to be of

the latter date. The Queen Ann~ Room has early C20 oak panelling. The Drawing Room is later C18 with gilding, pilasters, mirrors and an exceedingly fine coffered ceiling enriched with rosettes and moulding which is not in situ as one end covers over a bow window the width of the house. There is a tradition that the ceiling came from Paris but it is possible that this room could be part of Sylvanus Hall's work for the Cordwainers Hall of 1788, which was demolished in 1909. The L-shaped part of the hospital to the right is not of special architectural interest. Source: Howard Colvin "A Biographical Dictionary of British Architects. 1600-1840. Third edition 1995 p449. '

- 2.8. A Heritage Statement and Statement of Significance has been prepared and by Orion in support of this application. Please refer to the Statement's for further information.

3. Planning History

- 3.1. A search of the Council's online register of planning applications has been carried out and reveals an extensive list of history pursuant to the site. The following applications comprise the most relevant applications:

Reference AWDM/2234/21. Change of use from offices (Use Class E(g)(i)) to care/school facility with overnight accommodation (Use Class C2) together with associated fencing, gates, bin storage and extraction equipment. Granted 1 September 2022

AWDM/2235/21. Internal alterations associated with the above change of use and associated external works. Listed Building Consent granted 1 September 2022

- 3.2. As discussed briefly within this Statement, the above applications are directly relevant to the current application and comprise the same Applicant. Following consent in 2022, the school opened in 2023 and has operated as a day school since. The permitted overnight accommodation element was not implemented and therefore this application seeks to regulate planning on the land.
- 3.3. In addition to the above, discussions have been carried out with West Sussex County Council (WSCC) Education Department who have recommended expansion of the facility in terms of allowing more children to attend the facility at once. This follows positive feedback as a result of a recent OFSTED inspection. As such, this new application seeks to expand teaching space in order to accommodate the additional pupils.
- 3.4. A pre-application enquiry (**PREAPP/0152/25**) was submitted in October 2025 proposing amendment applications under Section 96a and Section 73, to amend the previous planning consent AWDM/2234/21, in order to accommodate the school expansion and regulate planning matters on the land.
- 3.5. The Council advised in a formal response dated 5 January 2026, that the scale and nature of the changes - particularly the shift from residential care (C2) to a day school (F1) for up to 80 pupils - represented a materially different form of development requiring a fresh full planning application and Listed Building Consent. This application responds directly to that advice.
- 3.6. A summary of the pre-application advice received is set out below:
- A fresh full planning application is required. The council does not agree that the proposed changes can be dealt with by a Non-Material Amendment or Section 73a minor material amendment to the 2022 permission. In their view, changing from the approved C2 care/school facility with overnight accommodation to a day school (Class F1) for up to 80 pupils is materially different in character and impact.
 - The principle of an SEN school use is broadly supported. The council indicates it is supportive in principle of improved education facilities, including this type of provision, subject to assessment against policy.
 - The key planning issues will be:
 - Transport and highway safety, especially peak-time traffic, drop-off/pick-up impacts and on-street parking in Parklands Avenue.

- Heritage impacts, because the site includes a Grade II listed house and other listed garden structures. Any proposals must be supported by a Statement of Significance and Heritage Impact Assessment, with strong justification for works and careful attention to the setting.
- Impact of new buildings in the grounds, including the proposed lodge/classroom buildings and replacement sheds. The council is concerned about a piecemeal spread of structures around the grounds and advises that some locations shown are unlikely to be supportable, particularly the north-east lodge near the listed gazebo and visible from Parklands Avenue.
- Trees, landscape and biodiversity, including impacts on TPO trees, the garden, lake and woodland setting. An arboricultural report and ecological appraisal will be needed.
- Neighbour amenity, including noise, activity, and the relationship of new lodges to nearby homes. The current proposed lodge positions near 35 Parklands Avenue and 3 Warnham Close are considered potentially unneighbourly.
- A site-specific flood risk assessment will be required.
- BNG and sustainable design requirements will also apply.
- Listed Building Consent will also be needed for any internal or external alterations affecting the listed building or listed garden structures.
- Unauthorised sheds/enforcement: The council notes the two sheds under construction are subject to an enforcement complaint.

3.7. Overall, the Council's conclusion is the use may be acceptable in principle, but a comprehensive new planning application and listed building consent application will be needed, supported by robust technical evidence, and there are concerns about traffic, heritage impact, siting of new buildings, trees/ecology, and neighbour amenity.

3.8. As a result of the Council's feedback, the proposals, in particular the lodge placement, has been reviewed and amended to be positioned further away from direct neighbours and to respond to technical matters following tree survey results. This application is supported by a number of technical reports

4. The Proposal

- 4.1. The application seeks full planning permission and Listed Building Consent for the following:
- Change of use from a care/school facility with overnight accommodation (Class C2) to a Special Educational Needs (SEN) School (Class F1) for up to 80 pupils;
 - Removal of the previously approved overnight accommodation from the scheme;
 - Retention of two replacement outbuildings (retrospective sheds);
 - Erection of additional lodge-style classroom buildings within the grounds;
 - Installation of a modest Multi-Use Games Area (MUGA);
 - Associated internal and external works.
- 4.2. The proposed change of use responds directly to the current use of the site, which has been operating as a day school provision since 2023. The approved overnight accommodation was not implemented and therefore the previously approved room sub-division was not implemented.
- 4.3. Following positive OFSTED inspection, WSCC Education Department have recommended expansion of the facility to allow more children to attend the facility at once. The proposals therefore seek consent for up to 80 pupils to be on site at once.
- 4.4. In addition to the above, this application seeks consent for the addition of 2no. new lodge buildings within the grounds of Courtlands, to be used as new classrooms and therapy rooms. The location of the buildings can be seen in the accompanying Plans and have been slightly re-positioned following feedback at pre-application stage, and following receipt of the Arboricultural surveys. These buildings are required to accommodate the increased capacity of pupils at the site and will assist with more complicated cases where a child requires adapting time / additional care away from the other children.
- 4.5. In addition to the 2no. new classrooms, the Applicant is seeking to regularise planning at the site in the form of activity which has already taken place. As discussed with the Council separately, this activity comprises of replacing an old, disused shed with 2no. new sheds. The location of these new sheds can be seen in the accompanying Plan.
- 4.6. Whilst not presented at pre-application stage, this application seeks consent for a modest Multi-Use Games Area (MUGA) to be erected near the entrance of the site. The location of the MUGA has been given careful consideration and specifically located behind the existing hedgerow on the eastern boundary to have minimal impact on the historic environment. This is assessed in further detail in the accompanying Heritage Statement.
- 4.7. The proposals have been informed by specialist input and pre-application advice and are supported by technical assessments addressing heritage, drainage, arboriculture and ecology.

5. Policy Overview

5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Worthing Local Plan (2023).
- 5.1.3. Other material considerations include The National Planning Policy Framework ('the Framework') and Planning Practice Guidance ('PPG'). The Council also has a suite of Supplementary Planning Documents (SPDs) which are noted as appropriate.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. Updated in February 2025, the following are considered the most relevant sections of the Framework applicable to the proposed development and have been fully considered in the preparation of this application:

- **Chapter 2 – Achieving Sustainable Development**
- **Chapter 6 – Building a Strong, Competitive Economy**
- **Chapter 8 – Promoting healthy and safe communities**
- **Chapter 9 – Promoting Sustainable Transport**
- **Chapter 11 – Making Efficient Use of Land**
- **Chapter 12 – Achieving Well-Designed Places**
- **Chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change**
- **Chapter 15 – Conserving and Enhancing the Natural Environment**
- **Chapter 16 – Conserving and Enhancing the Historic Environment**

5.3. Planning Practice Guidance (NPPG)

- 5.3.1. Published in March 2014, the guidance is updated regularly and supplements the overarching objectives of the Framework. The relevant sections of the PPG have been fully reviewed in the preparation of this application.

5.4. Worthing Local Plan

- 5.4.1. The Worthing Local Plan (WLP) was formally adopted at Full Council on 28 March 2023 and supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 5.4.2. The WLP sets out the strategic development and land-use priorities for Worthing (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within that area will be made. The main policies of relevance are:
- SP1 – Presumption in favour of sustainable development
 - SP2 – Climate Change
 - SP3 – Healthy Communities
 - SS1 – Spatial Strategy

- DM5 – Quality of the Built Environment
- DM8 – Planning for Sustainable Communities / Community Facilities
- DM15 – Sustainable Transport and Active Travel
- DM16 – Sustainable Design
- DM18 – Biodiversity
- DM19 – Green Infrastructure
- DM20 – Flood Risk and Sustainable Drainage
- DM23 – Strategic Approach to the Historic Environment
- DM24 – The Historic Environment

6. Planning Appraisal

6.1. Introduction

6.1.1. This section of the Statement details how the proposed development complies with the policies set out within the Development Plan. The following matters are the principal considerations with regards to the proposal:

- **Principle of Development**
- **Design, Form and Appearance**
- **Heritage Impact**
- **Transport and Highway Safety**
- **Residential Amenity**
- **Flood Risk and Drainage**
- **Arboriculture**
- **Ecology and Biodiversity Net Gain**

6.2. Principle of Development

6.2.1. The principle of educational use at the site has already been established through planning permission AWD/2234/21. While that permission included a residential care element (Class C2), the site has lawfully operated as a school since 2023. The current proposal regularises the position by formally establishing the use as a Class F1 SEN school without residential accommodation.

6.2.2. This application further seeks to expand the pupil capacity from 23 to up to 80 students, following recent independent education reviews, which identify a significant and growing demand for specialist SEN provision across the county. This demand is further endorsed by both the West Sussex County Council (WSCC) Education Department and Ofsted, who have each recognised the acute shortage of suitable places and the pressing need for sustainable expansion within high-quality existing settings such as this.

6.2.3. Paragraph 100 of the NPPF gives great weight to the need to create, expand or alter schools. Local Plan Policy DM8 similarly supports community facilities where they meet identified needs.

6.2.4. The applicant's Educational and Operational Justification Statement confirms that there is a need for this type of school and for the expansion of the facility, as summarised below:

- 100% of pupils have Education Health and Care Plans (EHCPs);
- The majority present with Autism Spectrum Condition and associated needs;
- There is a clear and growing demand for specialist SEN provision locally;
- The school operates at capacity and maintains a waiting list;
- West Sussex County Council supports expansion to reduce out-of-area placements.

6.2.5. The removal of overnight accommodation reduces the intensity of use outside school hours and eliminates residential activity entirely. The proposal therefore represents a more focused and policy-aligned educational use. The following extract from the pre-application response with the LPA is important in the consideration of this application:

"I understand OFSTED are supportive of your client's proposals and, as discussed at our meeting, I consider the Council would be supportive in principle of improvements

to education facilities, having regard to Government planning policy set out in paragraph 100 of the NPPF, and LP policy DM8."

- 6.2.6. The expansion to up to 80 pupils is supported by demonstrated need and makes efficient and sustainable use of an established educational site. The principle of development is therefore strongly supported by national and local policy.

6.3. Design, Form and Appearance

- 6.3.1. Policy DM5 of the Local Plan is concerned about 'Quality of the Built Environment' and states that all new development should be of high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area. In addition, new development should make a positive contribution and be well built, and fit for purpose.
- 6.3.2. The change of use does not require any internal alterations and seeks to operate as currently converted. It should be noted that a number of room sub-divisions were approved under the previous approval. These were however largely not implemented as a result of not proceeding with the overnight accommodation aspect. As such, the proposals no longer seeks to sub-divide a number of the rooms, as shown in the accompanying drawings. This approach therefore seeks to conserve the Listed building, as discussed in further detail later in this Statement.
- 6.3.3. The proposals seek consent for 2no. new lodge buildings within the grounds of Courtlands, to be used as new classrooms and therapy rooms, as shown in Figure 1. The location of the buildings has been informed by the accompanying Arboricultural information. In addition, the proposals seek consent to regularise planning in relation to retaining the 2no. new sheds, as shown in Figure 1, and which replace the existing old and disused sheds.



Figure 1 - Proposed Site Plan

- 6.3.4. The proposed lodges and sheds are considered to comply with Policy DM5 of the Local Plan by respecting the character of the area and providing buildings of appropriate character whilst fulfilling a need. It should be noted that the buildings are single storey in height and therefore are not visible from the public realm due to existing and established boundaries. The lodges and sheds are entirely fit for purpose for use by the main host building / school. As such, the proposals are considered to be entirely compliant with Policy DM5.
- 6.3.5. The proposed MUGA is located close to the entrance of the site, to the south of the access, as demonstrated in Figure 2. The MUGA measures 14m x 9m and has been located outside of any Root Protection Zone (RPZ). The MUGA is considered entirely necessary for the success of the school as it will provide a secure play area for the children to use for play and for educational purposes. A review of the entire site has been carried out and due to the site constraints and established tree roots, this is considered to be the only feasible location and is appropriately located behind existing boundary vegetation. As such, the proposed MUGA is considered to be compliant with relevant planning policy.

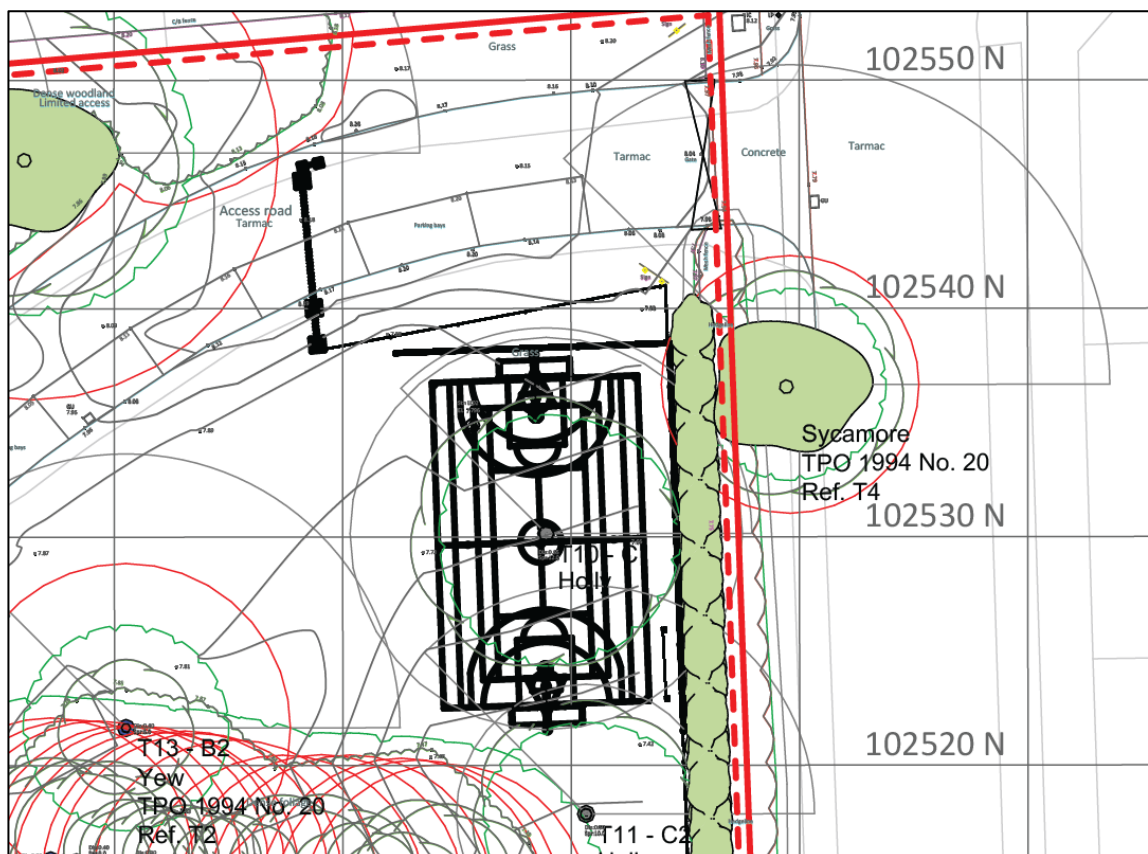


Figure 2 - Proposed MUGA Location

- 6.3.6. To conclude, the proposed design, form, scale and appearance of the proposals is considered to be entirely acceptable and would comply with local and national planning policy.

the Multi-Use Games Area (MUGA) would cause low-level less than substantial harm through a minor adverse change to the landscaped approach, and Classroom 1 would generate a low level of less than substantial harm through a small adverse change to the setting of Courtlands."

- 6.4.8. In conclusion the Heritage Assessment states that:

"The assessment concludes that the MUGA, Classroom 2, its ancillary shed, the gravel path and the retention of the lakeside shed would result in no harm to the significance of the listed garden structures. Classroom 1 would result in a small adverse change to the immediate setting of the Grade II listed gazebo, assessed as the lowest level of less than substantial harm. Classroom 1 would also result in a minor adverse change to the setting of the Grade II listed sundial; however, this effect would be negligible and would not harm the sundial's significance.

In terms of impacts on designated assets in the wider vicinity, the assessment has concluded the proposals; would not generate any harm to their significance.

The assessment has concluded that the 'Local Interest Buildings' identified in Section 4 of this report would not be adversely affected by the proposals in visual terms due to the nature and siting of the proposed works."

- 6.4.9. Please refer to the accompanying Heritage Assessment and Statement of Significance for further information.

6.5. Transport and Highway Safety

- 6.5.1. The pre-application advice received from the Council stated the following in relation to transport and highway safety:

"I am aware that the Local Highway Authority (WSCC) raised no objection to the previous planning application AWDM/2234/21 following the submission of TRICS data relating to trips generated (compared to the former office use of the building). This information essentially related to staff journeys, as it was anticipated that students would be resident at the premises. Clearly, this will not be the case in relation to the proposed school."

- 6.5.2. The previous planning application (AWDM/2234/21) received consent for a maximum of 23 children at any one time with approximately 30-35 members of staff. It was anticipated that 10 members of staff would stay overnight depending on user requirements. The proposed application seeks consent to extend pupil capacity to 80 students which would generate a need for 40 members of staff. In effect, this represents an increase of 57 pupils and approximately 5 additional staff when compared with the previously consented baseline.
- 6.5.3. In considering the likely transport effects of the proposal, it is important to recognise the specific characteristics of the use. The development is for a Special Educational Needs (SEN) school, and pupils would not be expected to travel independently by private car. Instead, pupil journeys would continue to be primarily managed through parent/carer drop-off and pick-up and local authority-commissioned taxi or shared transport arrangements.

- 6.5.4. As set out in the Applicant's supporting statement, the current travel patterns are understood to be as follows:
- 60% local authority taxis and multi car share
 - 30% parents
 - 10% foot or cycle.
- 6.5.5. Arrival and departure activity is also tightly managed and occurs within clearly defined periods, namely:
- Monday to Friday only
 - Morning drop-off: approximately 8.30am
 - Afternoon collection: approximately 3.30pm
- 6.5.6. These arrangements have operated successfully since the school opened in 2023, and there is no indication that the fundamental travel pattern would change as a result of the proposed increase in pupil capacity. Given the nature of the use, the structured arrival and departure periods, and the continued reliance on shared and managed transport, any increase in vehicular activity is not considered likely to give rise to a severe impact on the local highway network.
- 6.5.7. In terms of staff travel, the proposal would result in only a modest increase of approximately 5 additional staff over and above the previously approved position. The site benefits from adequate on-site parking provision, and, as noted in Section 2 of this Statement, is in a location accessible by a range of sustainable transport modes, including bus, rail and cycling. Staff would therefore have a choice of travel options and would not be wholly dependent on the private car.
- 6.5.8. Having regard to the extant fallback position, the established operation of the school, the managed nature of pupil transport, and the modest increase in staff numbers, it is considered that the proposed development would not result in an unacceptable impact on highway safety, nor would it give rise to severe residual cumulative impacts on the road network. The proposal is therefore consistent with the relevant provisions of the NPPF.

6.6. Residential Amenity

- 6.6.1. Policy DM8 of the Worthing Local Plan states that *"The Council will support improvements to health, education, social, community and cultural facilities to ensure they meet the needs of local communities where it is demonstrated that there would be no unacceptable impact on the occupiers of adjacent properties."* As set out in Section 2 of this Statement, the surrounding uses comprise predominantly residential and is characterised by detached and semi-detached properties. The potential effects of the proposal on neighbouring amenity have therefore been carefully considered.

- 6.6.2. In its pre-application response, the Council advised as follows in relation to residential amenity:

"Careful consideration will need to be given to the effect of the development proposals on the amenities of neighbouring residential occupiers in accordance with policy DM8. As well as the physical impact of the proposed new buildings, this will include consideration of the effects of increased comings and goings to and from the school by pupils and staff, as well as potential increased noise and disturbance arising from a more intensive use of the external grounds and provision of new facilities to support additional pupil numbers.

In my opinion, the siting of the proposed classroom 'lodges' in proximity to 35 Parklands Avenue and 3 Warnham Close is somewhat insensitive and in both cases is likely to have an unneighbourly impact on these properties."

- 6.6.3. It is important to note at the outset that an educational use has already been established at the site through planning permission ref. AWD/2234/21. Whilst that permission included a residential care element (Class C2), the site has been operating as a school since 2023. The current proposal therefore does not introduce an entirely new form of activity in this location; rather, it regularises the existing position by formally establishing the use as a Class F1 SEN school without residential accommodation, whilst also seeking to increase pupil capacity from 23 to 80.
- 6.6.4. In amenity terms, the main considerations are the potential effects arising from:
- the increased number of pupils and staff using the site;
 - the use of external areas, including the proposed MUGA; and
 - the siting and form of the proposed classroom buildings.
- 6.6.5. In respect of general activity levels, the proposal is not considered likely to result in unacceptable noise or disturbance to neighbouring occupiers. The site is already in educational use, and the day-to-day operation of the school is managed in a structured manner, with clearly defined arrival, departure, lesson and break times. Given the specialist nature of the school and the supervised operation of the site, external activity would remain managed and controlled rather than informal or unrestricted. The proposal would therefore intensify an existing use, but not in a manner that would materially alter the character of the site or give rise to unacceptable living conditions for nearby residents.
- 6.6.6. The proposed MUGA has been positioned towards the front of the site, fronting Parklands Avenue. The nearest neighbouring properties would be approximately 27 metres away, with separation provided by the highway and existing boundary treatment, including established hedgerow planting. In particular, the nearest dwelling to the east is located on the opposite side of Parklands Avenue, whilst No. 39 Parklands Avenue lies approximately 27 metres to the north. These separation distances are considered reasonable in the context of the surrounding suburban environment. Moreover, the MUGA would not be in constant use throughout the day; rather, it would provide a controlled space for structured and supervised activity. Its inclusion is an important part of the school's provision, helping to support pupils' physical wellbeing, emotional regulation and outdoor recreation, whilst also reducing pressure on internal accommodation.
- 6.6.7. In relation to traffic movements and associated disturbance, as set out in Section 6.5 above, the proposal would not result in severe residual cumulative highway impacts. Equally, no unacceptable amenity impacts are anticipated from vehicle activity. Arrival and departure times are concentrated within limited periods and the school has operated successfully on this basis since opening in 2023. The proposal would continue this established pattern of use, and the increase in pupil and staff numbers is not considered likely to give rise to harmful levels of noise, activity or disturbance for surrounding residents.
- 6.6.8. With regard to the proposed classroom 'lodges', the concerns raised at pre-application stage have been carefully considered. The proposed buildings would be single storey in scale and would be read in the context of the existing developed site. Owing to their limited height, siting and the presence of existing boundary treatment, they would not appear unduly prominent or overbearing when viewed from neighbouring properties, including 35 Parklands Avenue and 3 Warnham Close. As such, the proposals are not considered to give rise to unacceptable impacts in terms of outlook, enclosure or visual intrusion.

- 6.6.9. In addition, any noise generated from teaching activities within the classroom buildings would be typical of a school environment and would be contained to a significant degree by the built form itself. Noise emanating from the classrooms can be appropriately managed through normal school operation, including keeping doors and windows closed where necessary. This, together with the existing boundary treatment and separation distances to neighbouring dwellings, is considered sufficient to ensure that no unacceptable noise impact would arise. Should the Local Planning Authority consider it necessary, any further operational controls could be secured by planning condition.
- 6.6.10. Overall, having regard to the established educational use of the site, the scale and nature of the proposed development, the separation distances to neighbouring dwellings, and the managed operation of the school, it is considered that the proposals would not result in unacceptable harm to the amenity of adjacent residential occupiers. The development would therefore accord with Policy DM8 of the Worthing Local Plan and is acceptable in residential amenity terms.

6.7. Flood Risk and Drainage

- 6.7.1. The Government's Flood Maps for Planning have been reviewed and reveal that the site is situated within Flood Zone 1 which means that the land and property have a low probability of flooding. The site is subject to some minor surface water flooding and as such, a Flood Risk Assessment (FRA) and Drainage Strategy has been produced by Motion in support of this application.
- 6.7.2. The submitted Flood Risk Assessment concludes that the site is located within Flood Zone 1, signifying a very low risk of flooding from fluvial and tidal sources. Whilst climate change may result in some marginal changes in flood risk over time, the report confirms that this does not preclude the proposed development, particularly having regard to the nature of the proposed buildings and the wider flood management context.
- 6.7.3. In relation to surface water flooding, the Environment Agency's Risk of Flooding from Surface Water (RoFSW) mapping identifies that the majority of the site is at very low risk, with some areas of low, medium and high risk located primarily along the south-western boundary. Importantly, the Flood Risk Assessment confirms that the proposed MUGA pitch and Classrooms 1 and 2 lie outside both present and future surface water flood risk areas.
- 6.7.4. The two replacement sheds are identified as being located just within present and future surface water flood risk areas. However, as confirmed by the Motion report, these structures are not water-tight and would allow floodwater to enter in the event of a surface water flooding incident. They would therefore flood in a similar manner to the surrounding ground and would not obstruct overland flow routes, displace floodwater or increase flood risk elsewhere on or off the site.
- 6.7.5. In addition to fluvial, tidal and surface water considerations, the Flood Risk Assessment also reviews other potential sources of flooding. This concludes that the site is within an area of low groundwater flood risk, with only limited potential for groundwater flooding, primarily affecting below-ground structures. The site is also considered to be at very low risk of sewer flooding, is not at risk from reservoir flooding, and there is no known history of flooding affecting the site.
- 6.7.6. In drainage terms, the proposed development would incorporate an appropriate sustainable drainage strategy. The Motion report confirms that SuDS Pods are proposed to drain the roofs of the lodge buildings, providing an effective means of surface water management whilst also delivering water quality, amenity and biodiversity benefits. The

submitted strategy confirms that the proposals comply with the relevant national standards for sustainable drainage.

- 6.7.7. Having regard to the findings of the submitted Flood Risk Assessment and Drainage Strategy, it is evident that the site is suitable for the proposed development in flood risk terms. The development is located in an area of lowest flood risk, the most vulnerable elements of the proposal are sited outside areas at risk of surface water flooding, and the drainage strategy provides an appropriate and sustainable means of managing surface water runoff.
- 6.7.8. Overall, the proposed development would not be at unacceptable risk of flooding, nor would it increase flood risk elsewhere. The proposals are therefore considered to be acceptable in flood risk and drainage terms and consistent with national planning policy.

6.8. Arboriculture

- 6.8.1. Paragraph 136 of the NPPF recognises the important contribution that trees make to the character and quality of urban environments, as well as their role in helping to mitigate and adapt to climate change. The retention and protection of existing trees is therefore an important material consideration in the assessment of the proposals.
- 6.8.2. The site contains a number of existing mature trees, including a small group protected by Tree Preservation Orders (TPOs). In light of this, the application is supported by an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, prepared by ACD, which assess the likely effects of the development on the existing tree stock and set out appropriate protection measures.
- 6.8.3. It should be noted that the proposals have been refined since the pre-application stage in response to detailed arboricultural input, particularly in relation to the position of existing trees and their Root Protection Areas (RPAs). As a consequence, the proposed classrooms and MUGA have been repositioned in order to reduce their impact on retained trees and to ensure that the layout responds appropriately to the arboricultural constraints of the site.
- 6.8.4. As amended, the proposals require the removal of only one tree in order to facilitate the MUGA at the front of the site. The tree in question is identified as a Category C specimen, meaning that it is of low quality and limited arboricultural merit. In this context, its removal is considered to be justified and would not result in any significant harm to the overall arboricultural value or visual character of the site.
- 6.8.5. In addition, a limited number of tree surgery works are proposed, as detailed in Section 3.8 of the accompanying arboricultural report. These works are necessary to facilitate the development and are not considered likely to have any unacceptable impact on the health, longevity or amenity value of the retained trees. The submitted arboricultural documentation also sets out a range of mitigation measures and site controls to be implemented during construction, including protective fencing and working methods, in order to safeguard retained trees throughout the development process.
- 6.8.6. In relation to the two sheds which have already been erected on a retrospective basis, ACD has inspected the area and confirms that no noticeable adverse impact on surrounding trees was evident at the time of survey due to the lightweight nature of the sheds which sit on top of the ground. On this basis, no further arboricultural concerns arise in relation to these structures.

- 6.8.7. Overall, the application has been informed by detailed arboricultural assessment and the scheme has been amended to respond appropriately to the site's tree constraints. Subject to the implementation of the recommended protection measures and method statement, the proposed development would not result in unacceptable harm to retained trees or the wider arboricultural character of the site. The limited loss of one Category C tree is justified in the context of the overall scheme, and the proposals are therefore considered acceptable in arboricultural terms.

6.9. Ecology and Biodiversity Net Gain

- 6.9.1. Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing valued landscapes, sites of biodiversity value and minimising impacts on, and providing net gains for, biodiversity. In addition, Policy DM18 of the Worthing Local Plan seeks to ensure that development conserves and enhances biodiversity and is supported by appropriate ecological information where necessary.
- 6.9.2. In light of the nature of the site and the proposals, the application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Essential Ecology. The PEA is based on a desk study, an extended UK Habitat Classification survey and habitat suitability assessments for protected and notable species, including Badger, bats, nesting birds and Great Crested Newt.
- 6.9.3. The PEA confirms that there are no statutory ecological designations within 5km of the site and no non-statutory ecological designations within 1km. The nearest European sites are at a considerable distance from the application site, and the report concludes that no significant adverse effects on statutory or non-statutory ecological designations, ancient woodland, ancient or veteran trees, or off-site Priority Habitats are anticipated as a result of the proposals.
- 6.9.4. In habitat terms, the site comprises a mix of buildings, hardstanding, modified grassland, introduced shrub, woodland, pond, trees and hedgerows. The PEA identifies the site's principal Important Ecological Features as the native hedgerows and woodland W2, the latter being classified as a poor example of lowland mixed deciduous woodland Priority Habitat. These features are retained as part of the development proposals.
- 6.9.5. The PEA also confirms that most of the site's other habitats are of limited ecological value, with the majority of the affected areas comprising modified grassland and developed land. While a small level of intervention is proposed within woodland W3 and in the vicinity of certain hedgerows, the report concludes that the vast majority of habitats of ecological value, including mature trees, woodland, hedgerows and the onsite pond, would be retained.
- 6.9.6. In relation to protected and notable fauna, the PEA identifies the presence of Badger setts within the southern part of the site and confirms that the site provides opportunities for roosting bats, foraging and commuting bats, nesting birds, hedgehog and other small mammals, amphibians and reptiles. However, subject to the implementation of the recommended mitigation and precautionary measures, the report concludes that the proposed development would not result in significant adverse impacts on protected species or other biodiversity interests.
- 6.9.7. The mitigation measures recommended within the PEA include, amongst other things:
- safeguards for retained woodland, hedgerows and trees during construction;

- protective measures in relation to the onsite pond;
- updated Badger survey work and appropriate working methods in proximity to setts;
- precautionary measures for Great Crested Newt, amphibians, reptiles and small mammals;
- safeguards for nesting birds during vegetation clearance;
- and a sensitive external lighting strategy to avoid adverse effects on foraging and commuting bats.

6.9.8. In addition to mitigation, the PEA identifies a number of biodiversity enhancement opportunities, including:

- new native tree, shrub and hedgerow planting;
- provision of bat boxes;
- provision of bird boxes;
- creation of brash piles for small mammals, amphibians and invertebrates; and
- the creation of a stumpery / buried log pile to provide habitat for invertebrates, including Stag Beetle.

6.9.9. Such enhancements can be secured by condition.

6.9.10. The PEA concludes that, subject to the implementation of the recommended mitigation, compensation and enhancement measures, the proposed development is not likely to result in significant adverse impacts to biodiversity at the site or in the local vicinity, and that there is a clear opportunity to deliver ecological enhancement as part of the development.

6.9.11. In respect of Biodiversity Net Gain (BNG), the accompanying Biodiversity Gain Statement confirms that the development within the developable area will result in a net loss of habitat units and no net change of hedgerow units. As such, the proposals seek to obtain habitat and hedgerow units from a habitat bank, prior to commencement of development, in order to comply. The purchase of the units prior to commencement of development can be secured by condition.

6.9.12. Overall, the proposals are considered acceptable in ecological terms and accord with the biodiversity objectives of the NPPF and Policy DM18 of the Worthing Local Plan.

7. Conclusions

- 7.1. This application seeks full planning permission and Listed Building Consent for the change of use of Courtlands from a care/school facility with overnight accommodation (Class C2), as approved under references AWDM/2234/21 and AWDM/2235/21, to a Special Educational Needs (SEN) School (Class F1) for up to 80 pupils, together with the removal of the previously approved overnight accommodation, retention of two replacement outbuildings, erection of lodge-style classroom buildings, installation of a MUGA, and associated internal and external works.
- 7.2. The proposals respond directly to the site's established and successful operation as a day school since 2023, and regularise the planning position in a way that reflects the actual and intended use of the site. The development also responds to an identified and growing need for specialist SEN provision, supported by the Applicant's operational case, recent Ofsted outcomes and the support of West Sussex County Council Education Department for expansion of the facility.
- 7.3. The principle of the development is strongly supported by national and local planning policy, including paragraph 100 of the NPPF and Policy DM8 of the Worthing Local Plan, which support the creation and expansion of education facilities where appropriate.
- 7.4. In design terms, the proposed development has been carefully informed by technical input and pre-application discussions. The additional lodge buildings, sheds and MUGA are modest in scale, appropriate to their function, and have been positioned to respond sensitively to the character of the site, the setting of the listed buildings, existing trees and neighbouring occupiers.
- 7.5. The application is accompanied by robust supporting information addressing the principal material considerations, including heritage, transport, residential amenity, flood risk and drainage, arboriculture, ecology and biodiversity. These assessments demonstrate that the proposals would not result in any unacceptable adverse impacts and that the development can be satisfactorily accommodated on the site.
- 7.6. In heritage terms, the proposals have been designed to preserve the significance of the listed building and associated heritage assets, with any identified impacts falling at a very low level and being outweighed by the clear public benefits of the scheme, including the expansion of valuable SEN educational provision.
- 7.7. The proposals would not give rise to unacceptable impacts in terms of highway safety or neighbouring amenity, would be acceptable in flood risk and drainage terms, and have been developed with due regard to the site's trees, ecological features and biodiversity interests. Appropriate mitigation and enhancement measures are proposed where necessary.
- 7.8. Overall, the application represents a sustainable and policy-compliant form of development which would deliver important educational and community benefits through the expansion of an established specialist school in a suitable and accessible location. For all of the reasons set out within this Statement and the accompanying technical documents, it is respectfully requested that planning permission and Listed Building Consent are granted.

Appendix A – Pre-Application Response Reference PREAPP/0152/25 Dated 5 January 2026



Ms Rebecca Hoad
ECE Planning Limited
By Email

Our reference: PREAPP/0152/25
Please ask for: Jo Morin
Direct Line: 01903 221350
Date: 5th January 2026

Dear Rebecca,

**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 2015
COURTLANDS, 37 PARKLANDS AVENUE, WORTHING, BN12 4 NG**

I refer to your client's pre application enquiry setting out proposals for the use of the above grade II Listed property as a school (Class F1) for up to 80 children with special educational needs, consisting of a covering letter, Proposed Block and Location Plan (ARC/012/25/21) and Proposed Classroom plan (ARC/012/25/21).

This written response follows our online meeting on 15th December 2025, together with your Client and Alex Page (ArchEvolve Architects).

Planning permission was granted on 1 September 2022 under AWDM/2234/21 for: *Change of use from offices (Use Class E(g)(i)) to care/school facility with overnight accommodation (Use Class C2). Erection of 1.8m high powder-coated green pre-galvanised steel security perimeter fencing to part north, east and southern site boundaries, plus black metal estate railings to grounds; erection of 3.34m high gate piers (with in-built CCTV camera) and automated metal entrance gates to drive, bin storage within car park and kitchen extraction duct/equipment to south elevation (of western building component).*

Listed building consent was granted on 1 September 2022 under AWDM/2235/21 for: *Internal alterations involving removal and insertion of internal walls and doors in connection with change of use from offices (Use Class E(g)(i)) to care/school facility with overnight accommodation (Use Class C2). Erection of 1.8m high powder-coated green pre-galvanised steel security perimeter fencing to part north, east and southern site boundaries, plus black metal estate railings to grounds; erection of 3.34m high gate piers (with in-built CCTV camera) and automated metal entrance gates to drive, bin storage within car park and kitchen extraction duct/equipment to south elevation (of western building component).*

It is known that since the school opened in 2023 it has operated as a day school 'Courtlands Independent Special School', with no residential accommodation provided.

It is not known if the approved 1.8 metre high powder-coated green pre-galvanised steel security perimeter fencing has been erected to the part north, east and southern site boundaries, or the automated entrance gates and 3.34 metre high gate piers installed/constructed.

My understanding is that the kitchen extraction duct/equipment has not been installed.

I am aware that the approved black metal estate railings have been erected within the grounds albeit not shown on the Proposed Block and Location Plan ref: ARC/012/25/21 submitted with this enquiry.

The covering letter proposes a route to secure planning permission for a proposed school/education establishment (Class F1) for up to 80 pupils by means of:

- A Non-Material Amendment (NMA) application to AWDM/2234/21 to remove reference to the overnight accommodation from the description, followed by: -
- A S73a (Minor Material Amendment) application to vary condition 1 (approved plans) and condition 11 (number of pupils) of AWDM/2234/21 to retain and utilise existing room layout to expand teaching space and remove the residential accommodation and increase pupil capacity at the school to up to 80 students.
- A fresh application for Listed Building Consent would be submitted to reflect changes to the internal floorplans as required for the proposed use.
- An application for full planning permission for the erection of 2no new lodge/classroom buildings in the grounds.

The application for full planning permission would also seek retention of 2no unauthorised 'sheds' that are under construction within the grounds. The latter are the subject of a current enforcement complaint AWEN/0152/25.

As discussed at our meeting, in my opinion the proposed use as a school (Class F1) for up to 80 pupils and removal of overnight accommodation is materially different in character and impact to the permitted use as a residential /care facility (Class C2) granted under AWDM/2234/21. Accordingly, it would not be appropriate to amend the planning permission AWDM/2234/21 in the ways suggested. A fresh full planning application for the proposed development will be required.

Any forthcoming planning application will be considered on its merits in relation to the NPPF and the following relevant policies contained within the adopted Worthing Local Plan:

SP1 - Presumption in Favour of Sustainable Development
SP2 - Climate Change
SP3 - Healthy Communities
SS1 - Spatial Strategy
DM5 - Quality of the Built Environment
DM8 - Planning for Sustainable Communities/Community Facilities
DM15 - Sustainable Transport & Active Travel
DM16 - Sustainable Design
DM18 - Biodiversity
DM19 - Green Infrastructure
DM20 - Flood Risk and Sustainable Drainage
DM23 - Strategic Approach to the Historic Environment
DM24 - The Historic Environment

Principle of Development

I understand OFSTED are supportive of your client's proposals and, as discussed at our meeting, I consider the Council would be supportive in principle of improvements to education facilities, having regard to Government planning policy set out in paragraph 100 of the NPPF, and LP policy DM8.

The key considerations in assessing any forthcoming planning and listed building consent applications will be transport and highway safety impacts, the effect on designated heritage assets and their settings, the effect on green infrastructure (trees) and biodiversity, and on the amenities of neighbouring residential occupiers.

Fundamentally, the planning and Listed Building Consent applications should take a comprehensive approach to outlining what new facilities will be necessary to support the proposed development and associated increase in pupil numbers.

Transport and Highway Safety

I am aware that the Local Highway Authority (WSCC) raised no objection to the previous planning application AWDM/2234/21 following the submission of TRICS data relating to trips generated (compared to the former office use of the building). This information essentially related to staff journeys, as it was anticipated that students would be resident at the premises. Clearly, this will not be the case in relation to the proposed school. In my opinion, a Transport Statement (with Travel Plan) should be prepared to support an application, which considers accessibility (including by sustainable modes of transport), trip-generation, modal-split and parking. I would encourage your client to seek pre application advice from WSCC on the scope of a Transport Statement prior to making an application.

Based on the previous planning application, I anticipate concerns about increased traffic generation and the potential impacts of such for on-street parking in Parklands Avenue (during peak drop-off and collection times) will generate significant local interest. Consequently, it is important that a planning application is supported by robust evidence setting out the transport impacts of the development and along with any mitigation measures considered necessary.

Impact on Visual Amenity and Designated Heritage Assets

As you know, the former house at Courtlands is Listed Grade II. In addition to the house, the sundial, gazebo, balustraded terrace and garden archway located within the grounds are all separately listed Grade II.

Section 66 Planning (Listed buildings and Conservation Areas) Act 1990 confers a statutory duty on the Local Planning Authority to have special regard to the desirability of preserving or enhancing the listed building or its setting or any features of special architectural or historic interest which it possesses. This duty is reinforced by Section 16 of the NPPF reaffirming these assets as an irreplaceable resource that should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraphs 212-213 of the NPPF state that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

A Listed Building Consent application will be required for any alterations (external or internal) to the fabric of the building, or the above-mentioned garden structures. It can reasonably be expected that as bedrooms are no longer required, previous impacts arising from the proposed subdivision of rooms on the first and second floor of the building will be removed. On the other hand, alterations now considered necessary to facilitate the use of the upper floors as classrooms may well have different impacts that will require justification.

The provision of new lodge buildings and replacement sheds will not require Listed Building Consent but will require an application for full planning permission.

It is imperative that the current proposals are reviewed and any forthcoming planning and Listed Building Consent applications supported by an adequate 'Statement of Significance' and 'Heritage Impact Statement'.

These statements should pay particular reference to the Historic England Guidance 'The setting of Heritage Assets (GPA3) in forming any conclusion or specific design proposal for development proposed within the grounds (including new buildings, hard surfaces/paths etc.).

The Council's Heritage Advisor has advised that the piecemeal and 'peppering' of ancillary buildings and associated hard surfaces/footpaths within the grounds should be avoided with proposals for new development paying considerable attention to context and justification of need.

The Heritage Advisor states that whilst the provision of a classroom 'lodge' with a more intimate, informal woodland setting *may* be acceptable, random placement that erodes the formality of the gardens will not be accepted.

The size and placement of the proposed replacement ancillary storage 'sheds' shown on the submitted drawing ARC/012/25/20 will need to be fully justified in terms of need and located within an ancillary area.

In planning the siting of proposed outbuilding(s) and any other facilities necessary to support the development, it is advised that careful consideration is given to long views across the gardens both to and from the main house with intervisibility of structures avoided. To this end it is noted that the proposed classroom 'lodges' are sizeable structures, likely to project a strong visual presence, which it may not be possible to mitigate through siting and context alone.

The siting of the proposed northeast lodge building in proximity to the listed building, particularly the listed gazebo, and where it would also likely be visible in public view from Parklands Avenue (in angled views across the frontage of No.35), is unlikely to be supportable.

The garden, lake and woodland are all important elements that contribute positively to the setting to of the listed house (and associated listed garden structures). Many of the trees in the grounds are subject to TPOs No.20 of 1994 and No.1 of 1972. Any forthcoming planning application should be accompanied by a full arboricultural report and survey that assesses the effects of any proposed new buildings, structures and surfaces on the health and future wellbeing of all existing trees.

Policy DM19 states that new development should not result in a net loss of trees and any trees removed where practical and appropriate should be replaced on a greater than 1:1 basis to support levels of canopy cover and contribute to biodiversity

Residential Amenity

Careful consideration will need to be given to the effect of the development proposals on the amenities of neighbouring residential occupiers in accordance with policy DM8. As well as the physical impact of the proposed new buildings, this will include consideration of the effects of increased comings and goings to and from the school by pupils and staff, as well as potential increased noise and disturbance arising from a more intensive use of the external grounds and provision of new facilities to support additional pupil numbers.

In my opinion, the siting of the proposed classroom 'lodges' in proximity to 35 Parklands Avenue and 3 Warnham Close is somewhat insensitive and in both cases is likely to have an unneighbourly impact on these properties.

Other matters

Parts of the site are located within EA Flood Zone 2 and 3, and some parts shown to be at high or medium risk of surface water flooding taking into account the effects of climate change. The proposed school development (Class F1) is a 'more vulnerable' use, and a planning application should be accommodated by a site-specific flood risk assessment.

The woodland area around the lake has been unused for many years and lies outside the 'developable area' of the development considered under AWD/2234/21. Any forthcoming planning application should therefore be accompanied by a preliminary ecological appraisal (PEA) to identify ecological constraints, the need for any additional ecological surveys and potential mitigation measures.

I draw your attention to legislative and LP policy requirements of for BNG. Although the Government's recent announcement has signalled a change to mandatory BNG for small sites, the site area in this case exceeds the planned exemption (up to 0.2ha).

Attention is also drawn to the requirements for sustainable design set out in LP policy DM16.

Finally, regarding the unauthorised works that have recently taken place on the site (AWEN/0152/25), you state the 'sheds' under construction are replacements for existing sheds and will be used for storage. I should point out that this contradicts the complaints we have received. I strongly urge that no further work is undertaken on the buildings and that they are not used (for storage or any other purpose) unless and until planning permission is granted. I must inform you that at this stage there is no certainty of planning permission being granted, particularly in the absence of any detailed drawings, any justification for their need (or why they are larger than the sheds to be replaced), an appraisal of their impact on the setting of the listed building (and other various listed garden structures), or their effects on existing and TPO trees.

I hope these comments are of assistance.

Yours sincerely

Jo Morin
Principal Planning Officer (Worthing West)

