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# PLANNING STATEMENT

**IN RELATION TO:**

***'Erect 2 no. semi-detached dwellings. Repair of  
fire damaged Listed building'***

**Site Address:**

**Land at Thatch Cottage, Pond Lane, Worthing,  
West Sussex, BN13 2RH**

**November 2025**





## 1. INTRODUCTION

- 1.1 This Planning Statement accompanies an application for planning permission and listed building consent, which is submitted on behalf of Drew Bailey ('the Applicant'). The planning application proposes the erection of 2 No. 3-bedroom semi-detached dwellings on land located to the west side of Thatch Cottage on Pond Lane in Worthing.
- 1.2 The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal in light of the relevant policy and all other material planning considerations.
- 1.3 The application is presented with a full package of plans, which have been prepared by Manorwood. The application also includes:
- Heritage Statement, prepared by Manorwood (which includes at Appendix 1 a detailed list of the anticipated costs associated with the 'Listed Building Repair and Reinstatement', and at Appendix 2 a 'Case for Development Financial Model');
  - Flood Risk Assessment & Drainage Strategy, prepared by Hilson Moran;
  - Tree Report, prepared by Arbortrack;
  - Bat Scoping Assessment, prepared by The Ecology Co-op;
  - Biodiversity Impact Calculation, prepared by The Ecology Co-op; and,
  - Biodiversity Net Gain Statutory Metric, prepared by The Ecology Co-op.



## 2. SITE CONTEXT

- 2.1 The Application Site comprises a fire damaged Grade II Listed building (Thatch Cottage), and associated garden area, which is positioned on the south side of Pond Lane in Durrington. The site area measures approximately 0.1 hectares.



**Fig 1.** Aerial Map (the site is outlined in red indicatively). (Courtesy of Promap)

- 2.2 The site is to the south of Pond Lane recreation ground, whilst further to the west there is a lorry park. There are residential properties opposite including Durrington Farmhouse, which has a frontage onto Pond Lane. Also opposite in a building used



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by a Sea Scouts. To the immediate west of Thatch Cottage are a pair of flint cottages, which were understood to have been built in circa 2012. To the rear are properties on Birkdale Close. Further to the east, towards the junction with Durrington Lane, is an area of vegetated and undeveloped land that is outside of the Application site area.

- 2.3 The site is located within the defined built-up area boundary, where the principle of development is accepted subject to policies in the plan. The site is not within a Conservation Area. Some of the trees on the site are covered by a Tree Preservation Order.
- 2.4 As detailed within the FRA that accompanies this Planning Application, *“The Environment Agency (EA) Flood Map for Planning has identified that the site is wholly within fluvial Flood Zone 1 (low risk), with no flooding of the site in the current or future defended or undefended scenarios. The EA Risk of Flooding from Surface Water Maps shows that the site is at “High Chance” of surface water flooding”*.



### 3. RELEVANT PLANNING HISTORY AND PRE-APPLICATION DISCUSSIONS

#### (i) Planning History

- 3.1 According to the Council's online planning records, the Thatch Cottage has had a number of previous planning applications, the majority of which relate to the provision of 2 new cottages on land further west. These houses have now been constructed following planning permission that was granted by Worthing Borough Council on 31<sup>st</sup> March 2021 (planning application reference: WB/11/0042/FULL refers).

#### (ii) Pre-Application Advice

- 3.2 More recently, and on behalf of the Applicant, a scheme for new housing at the Thatch Cottage site was presented to the Borough Council by Manorwood (pre-app reference: PREAPP/0076/23)
- 3.3 The pre-app scheme proposed two new detached dwellings, one to the east and one to the west side of the retained Listed Building.
- 3.4 The proposals were considered by the Planning Officer (Rebecca Hincke) and the Council's Design & Conservation Architect. The Officers confirmed that the principle of development on this site is accepted, and therefore *"additional dwellings in this location in principle would not be a departure from policy. Enabling Development would not apply here."*
- 3.5 The Officer's confirm that the approved and constructed new dwellings to the west are situated on what was previously curtilage to the Thatch Cottage and help to *"screen the setting of the Listed Building from the lorry park. That development appears as a relatively sensitive infill development with the simple form to the buildings sympathetic to the form and design of Durrington Farmhouse opposite. The remaining side garden areas at Thatch Cottage with mature trees still provide*



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*an attractive setting to the Listed Building and make an important contribution to the streetscene and to the landscape setting of the site.”*

- 3.6 The Officers commented that providing 2 no. new detached houses (one to either side of Thatch Cottage) would reduce the curtilage and alter the character of the streetscene. The Council’s Design and Conservation Architect has commented that the proposed new 2 storey dwellings sited close to the flanks of the listed building would significantly change the setting of Thatched Cottage, and the resultant level of harm, although less than substantial, would still be high within this range.
- 3.7 The Planning Officer went on to comment that *“However, our Design and Conservation Architect is of the view that there may be scope for a smaller new dwelling to the west of Thatched Cottage. The relationship with other residential buildings in Pond Lane would need careful consideration.*

*Although the character of the street changes further to the west, in the immediate vicinity of the site there is a distinct character. The low flint boundary walls provide continuity and contribute to the coherence to this part of the streetscene in my view, where other similar boundary treatments exist at Durrington Farmhouse opposite and in the more recent development of flint cottages to the west. I think that the opening of sections of wall to form the access to the new dwellings and car parking for the cottage would create marked breaks in the continuity of boundary walls and hedges and potentially expose an expanse of parking and hard landscaping treatments. You would need to ensure that any design would not make parking visually prominent in the scheme.*

*The proposals would result in the loss of five trees. I have consulted with the Council’s Senior Tree and Landscape Officer who has raised serious concerns over the impact of the development particularly that to the east of Thatched Cottage, but considers that there may be scope for a dwelling to the west subject to a suitable tree report being provided with any subsequent application.”*



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- 3.8 The pre-app reply also provided comments in respect of the amenities of occupiers of adjoining properties (including Thatch Cottage), confirming that *“Any subsequent proposals would need to be carefully designed taking account of separation distances, height and position of windows.”* The Officer also drew attention to the Governments Nationally Described Space Standards, and Policy DM2 of the Worthing Local Plan 2023 in respect of the provision of external space.
- 3.9 Further comments were also provided by Officers in respect of the need for a Flood Risk Assessment, compliance with Biodiversity Net Gain (BNG) requirements, and parking and highway matters.





## 4. THE PROPOSAL

4.1 This Planning Application seeks planning permission for the provision of 2 no. semi-detached 3-bed houses to be positioned to the west side of Thatch Cottage. The new houses would be 2-storeys. Car parking for the new houses and the Thatch Cottage would be provided to the east, as indicated below. This would utilise an existing access and hardstanding area.

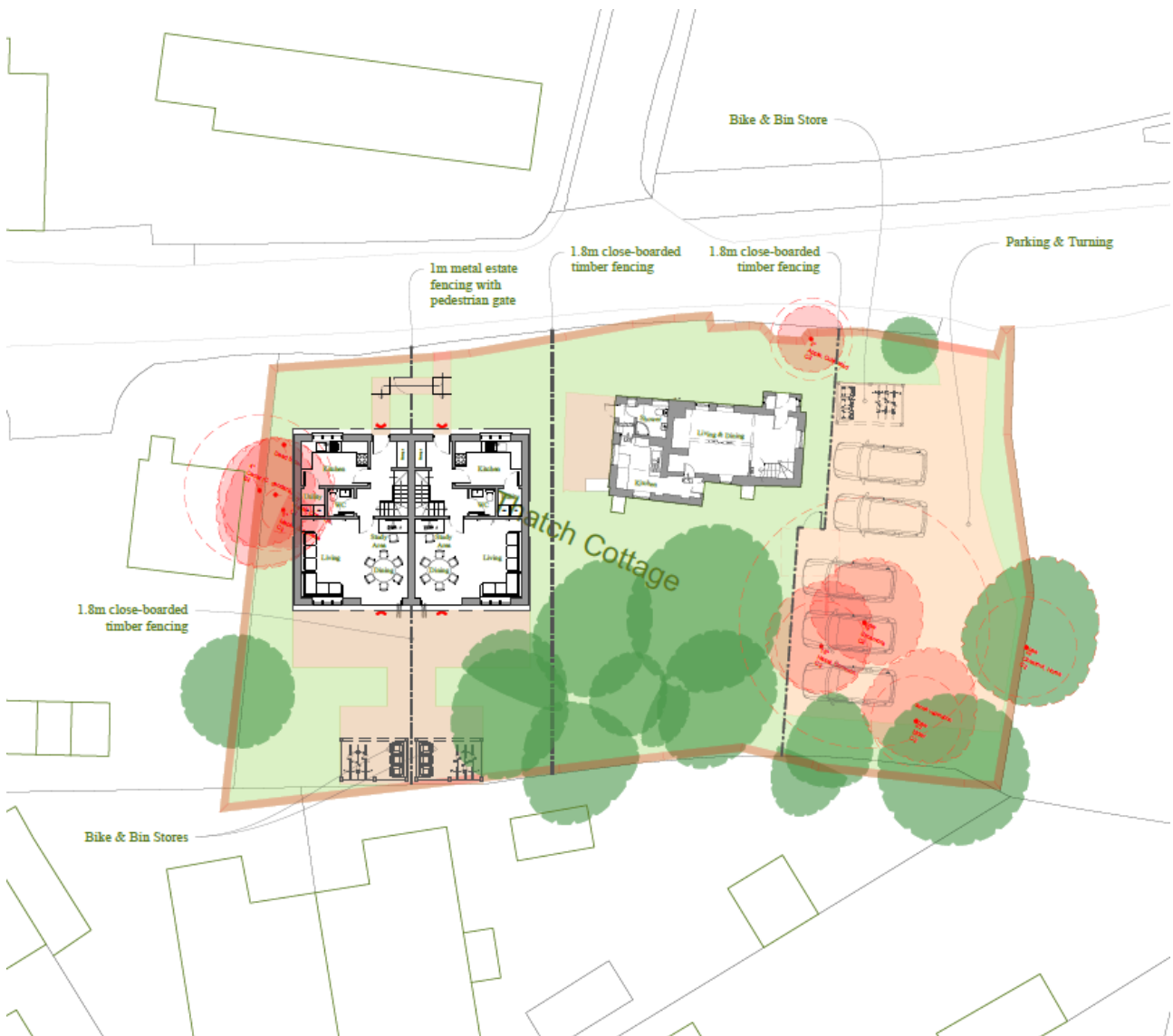


Fig 2. Proposed Site Plan



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- 4.2 The new dwellings would each measure 93.01 sqm. The properties would have a living/dining area, kitchen with utility space, and a WC at ground floor level. At first floor each house would have 3-bedrooms with a family shower room. The elevations will be in coursed flint with red brick quoins and dressings, traditionally styled casement windows and doors, under a steep pitched clay tile roof.
- 4.3 Externally the new houses would have good sized rear gardens, with an area for bin and bicycle storage.
- 4.4 The fire damaged existing Listed building will be completely restored as per the schedule in 'Appendix 1: Listed Building Repair & Restoration' at the end of the accompanying Heritage Statement. This application also seeks Listed building consent in this respect. The accompanying Heritage Statement confirms that the proposals include to reinstate the *“former internal plan form and external appearance. This may include leaving its flint and brick elevations unpainted, dependent on the condition of remaining masonry once cleaned and/or evidence of early lime wash.”*
- 4.5 The proposed boundary treatment would comprise 1.8m close boarded timber fencing to the side boundaries. At the front of the 2 new cottages, it is also proposed to provide metal estate fencing to subdivide the front gardens. A single pedestrian entrance point is provided to serve the 2 houses. Elsewhere the low level masonry and flint wall to the site's frontage would be retained.



## 5. POLICY CONTEXT

### a. NATIONAL PLANNING POLICY

#### (i) The National Planning Policy Framework (NPPF)

- 5.1 The National Planning Policy Framework (NPPF) was originally published in 2012 and has been subject to a number of revisions subsequently, with the most recent version being published on 12th December 2024.
- 5.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *“at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and to achieve sustainable development there are *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9).



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- 5.4 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) 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:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*
- 5.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.*
- 5.6 Paragraph 14 is relevant in this case. It states *“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*



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- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70);*

- 5.7 Section 4 of the Plan refers to Decision Making. At paragraph 39 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.
- 5.8 The Framework also sets out that there are only limited circumstances where decision-makers should give weight to policies in emerging plans, and generally *“refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan”* (paragraph 51).
- 5.9 Section 5 relates to delivering a sufficient supply of homes. It reiterates at paragraph 61 that the Government’s objective is to significantly boost the supply of new homes. Paragraph 65 confirms that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).
- 5.10 Paragraph 73 continues *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out*



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*relatively quickly. To promote the development of a good mix of sites local planning authorities should... d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes...”*

- 5.11 Section 9 discusses promoting sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles. At paragraph 116, the framework confirms that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”*.
- 5.12 Section 11 is entitled ‘Making effective use of land’. Paragraph 119 confirms that *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*.
- 5.13 Paragraph 125 sets out that decision makers are required to give regard to benefits of development, including environmental gains, and should *“(c) give substantial weight to the value of using suitable brownfield land within settlements for homes ...[and] (d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively...”*.
- 5.14 Paragraph 127 states that *“decisions need to reflect changes in the demand for land.... applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area”*.



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- 5.15 Paragraph 129 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability, existing character and setting, and *“the importance of securing well-designed, attractive and healthy places.”*
- 5.16 Section 12 refers to achieving well-designed and beautiful places. Paragraph 131 states *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development...”*
- 5.17 Paragraph 135 sets out that *“decisions should ensure that developments: (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users 51 ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.*



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- 5.18 Paragraph 139 confirms that *“development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design , taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes”*.
- 5.19 Section 16 relates to Conserving and Enhancing the Historic Environment. Paragraph 207 states that *“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*.
- 5.20 Paragraph 212 states 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”*.
- 5.21 Paragraph 215 states that *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”*.
- 5.22 Also of relevance is paragraph 221, which says that *“Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.*



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- 5.23 The NPPF seeks to conserve and enhance the historic environment with much emphasis on “significance”, defined in Annex 2 as: *“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”* Setting is defined in Annex 2 as: *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*
- 5.24 The NPPF states that flood risk and surface water disposal are material considerations for Local Planning Authorities when determining individual land-use planning proposals. The NPPF reinforces the importance that the Government attaches to the management and reduction of flood risk in the land-use planning process, whilst also adopting a precautionary approach and fully accounting for the effects of climate change. The NPPF states how flood risk should be considered at all stages of planning and development, in an attempt to reduce future loss of life and damage to property. The NPPF also states that surface water disposal is a material consideration for Local Planning Authorities when determining individual land-use planning proposals and that SuDS should be incorporated into a development wherever practical development *“unless there is clear evidence that this would be inappropriate. The systems used should:*
- a) take account of advice from the lead local flood authority;*
  - b) have appropriate proposed minimum operational standards;*
  - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
  - d) where possible, provide multifunctional benefits.”*

5.25 The NPPF is supported by Planning Practice Guidance, which provides further information on key issues in the implementation of policies identified in the NPPF.

**b. LOCAL PLANNING POLICY**

(i) Worthing Local Plan

5.26 Worthing Borough Council formally adopted the Worthing Local Plan 2020-2036 at Full Council on 28<sup>th</sup> March 2023. The Worthing Local Plan (2023) now forms part of the statutory Development Plan. The site is within the defined built up area boundary as defined by the Worthing Local Plan Policies Map (please see **Fig 3** below).

5.27 The relevant policies are as follows:-

- Policy SP1: Presumption in Favour of Sustainable Development
- Policy SS1: Spatial Strategy
- Policy DM1: Housing Mix
- Policy DM2: Housing Density
- Policy DM5: Quality of the Built Environment
- Policy DM15: Sustainable Transport and Active Travel
- Policy DM16: Sustainable Design
- Policy DM17: Energy
- Policy DM18: Biodiversity
- Policy DM20: Flood Risk and Sustainable Drainage
- Policy DM22: Pollution
- Policy DM24: The Historic Environment

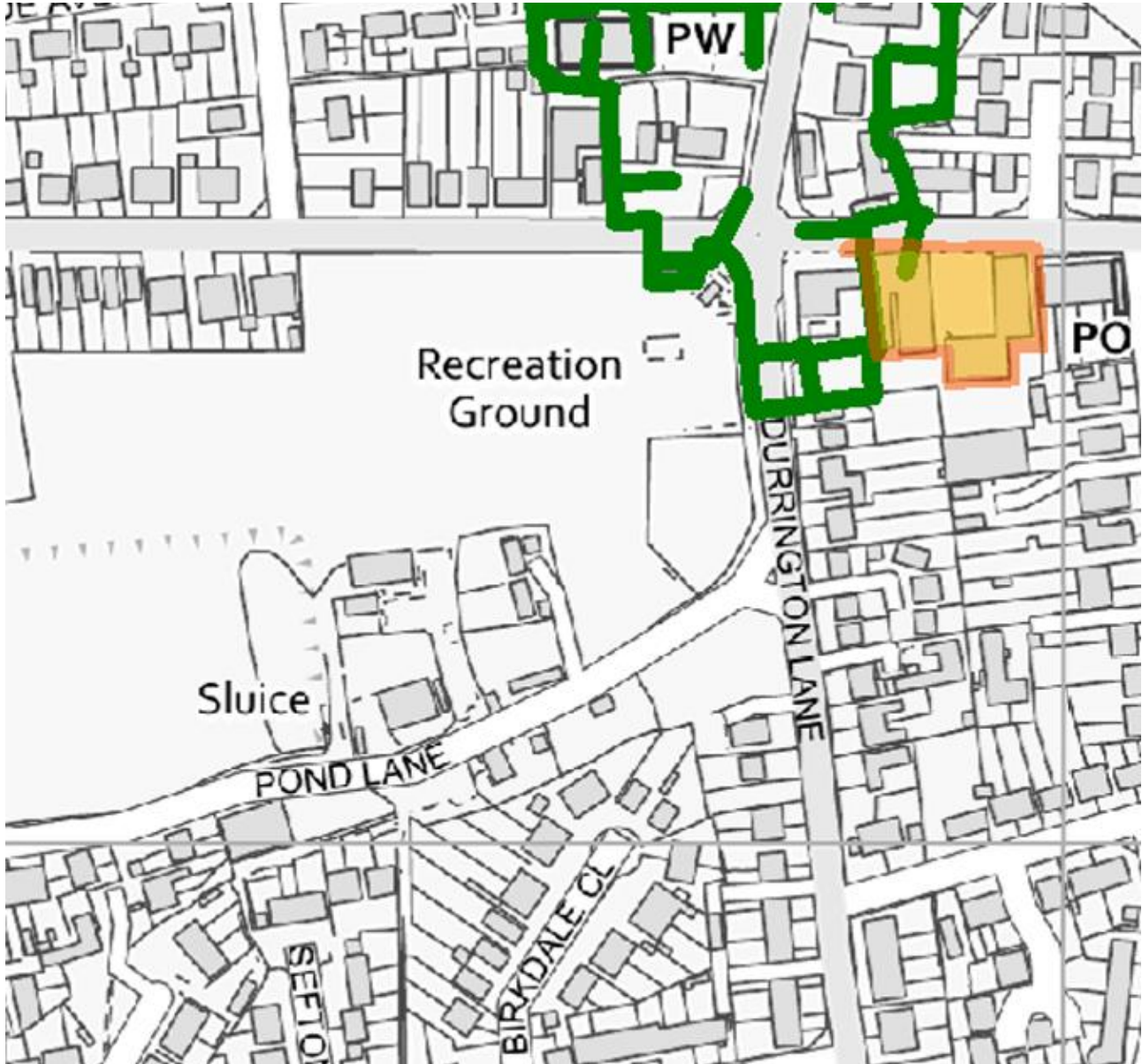


Fig 3. Extract from the Council's Local Plan Policy Map

(ii) Supplementary Planning Documents

5.28 The Council's SPD Guide for Residential Development also provides guidance on infill development. It recognises the role garden space has including contribution to local character, green infrastructure biodiversity, flood risk and mitigating the effects of climate change and that such matters will need to be considered in assessing any



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application that would involve the loss of such space (para 4.27). It states that infill development requires sensitive design and good landscaping if new buildings are to be fitted successfully into small sites in established residential areas. Insensitive infilling that will negatively impact on areas character or amenity will be resisted (para. 4.33).

(iii) Neighbourhood Plan

5.29 It is understood that this area of Worthing Borough does not have a Neighbourhood Plan at the current time.



## 6 PLANNING ASSESSMENT

### Need for Development

- 6.1 The proposal seeks planning permission for the erection of 2 No. semi-detached houses, to the west side of the Grade II listed Thatch Cottage. The site lies within the defined built-up area, and the Planning Officer has confirmed that development is therefore acceptable in principle terms.
- 6.2 The development is proposed to provide funds that would be used to restore the fire damaged Listed building. This is explained in detail within the accompanying Heritage Statement, which has been prepared by Manorwood. Due to new development being acceptable in planning policy principle terms, Planning Officers have advised that it does not meet the 'enabling development' test as outlined in the NPPF.
- 6.3 The Heritage Statement acknowledges this, but says that *"Irrespective of the name used to describe it, the Case for Development' [see Heritage Statement Appendix 2] illustrates the realistic minimum development necessary on the site in order to generate sufficient funds to save the listed building and return it to its optimum viable and beneficial use... The objective of the financial model is to illustrate the minimum development necessary to generate the funds required to ensure the security of the heritage asset and return it to its optimum viable use..."*
- 6.4 In terms of delivery and implementation, the Heritage Statement confirms that *"A fixed price programme of development will prevent cost overrun risk eating into the funds generated for the conservation need. A proposed Section 106 Agreement will link and control the funds generated by the development directly to addressing the conservation needs. Construction will be in accordance with a detailed and approved heritage specification."*



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6.5 Within the 'Case for Development' section of the Heritage Statement, the Applicant's Heritage Consultants (Manorwood) state *"Whilst it is acknowledged that this development proposal does constitute less than substantial harm to the setting of the designated asset (please refer to page 14 Impact Assessment), it is considered that this harm is at the lower end of less than substantial and is outweighed by the public benefit in saving the heritage asset.*

*Furthermore, whilst the scale of the proposed new dwellings presents a challenge from a planning perspective (one reason for a previously refused application in 2008), and garden amenity spaces are less than is typically required by local guidance, the need to find a scale of development that presents the minimum viable release of capital to save the heritage asset is considered to outweigh these challenges.*

*The proposed development should be permitted to fully fund the necessary repair works and secure the listed building because the dis-benefits of departing from some normal planning policies are outweighed by the benefits of conserving the asset."*

Setting of Heritage Asset

6.6 As indicated above, it is acknowledged that the proposed development would lead to 'less than substantial harm' to the setting of Thatch Cottage.

6.7 The accompanying Heritage Statement assesses the impact of the proposed development on the setting of the heritage asset, and confirms that the proposals will have *"a minor negative impact on the aesthetic value of the building and its setting, although the value of the building's relationship with the mere or pond(s) and the rural nature of the area had already been completely eroded since the pond was drained in the 1985 and the subsequent modern development. Even so, the proposed new dwellings will result in less than substantial harm at the lower end of the scale."*



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- 6.8 In terms of the benefits of the proposals, the Manorwood statement confirms that *“The repair and restoration of the fire-ruined listed building, including the removal of inappropriate modern materials that have been found to have been added over recent years, will clearly have a highly positive impact on the evidential and aesthetic values of the building and its setting. Historic materials will be retained in their original locations where still serviceable and the building will be returned to its former appearance, enhancing the street scene... Opening up the eastern section of the plot in particular and the frontage in general will have a highly positive impact on the aesthetic and communal values of the building and its setting. The eastern elevation of the building will become more visible in the street scene and the perceivable depth of the plots will be reinstated. Pond Lane will appear far less enclosed here as result and the building’s relationship with Durrington Farmhouse opposite will be restored.”*
- 6.9 In conclusion Manorwood confirm that *“The proposal clearly sets out a positive strategy for the conservation of the heritage asset at great risk as required in Paragraph 203 of the NPPF. The proposal focuses heavily on the conservation of the heritage asset whilst acknowledging less than substantial harm to its significance as required in Paragraph 212 of the NPPF. The proposal weighs the less than substantial harm created by the new development against the clear public benefits to the listed building and its setting by restoring it and securing the optimum viable, thereby conserving and enhancing its significance. It is accepted that proposals specifically designed to facilitate repair of designated heritage assets are permissible only in the interests of the asset rather than of the owner. However where there is no alternative to achieving the long term security of the asset, such schemes must be acceptable in principle. The impact of the works proposed in this report have been assessed and they are considered overall to conserve the significance of the Listed Building and its setting. The proposal outlined here is therefore considered to be compliant with the Planning (Listed Building and*



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*Conservation Area) Act 1990, the National Planning Policy Framework (NPPF), PPG and The Worthing Local Plan (adopted 28th March 2023)."*

Flood Risk & Drainage

- 6.10 The Application is accompanied by a Flood Risk Assessment and Drainage Strategy report that has been prepared by Hilson Moran.
- 6.11 Although the Environment Agency (EA) Flood Map for Planning has identified that the site is wholly within fluvial Flood Zone 1 (low risk), with no flooding of the site in the current or future defended or undefended scenarios, the EA's Risk of Flooding from Surface Water Maps shows that the site is at "High Chance" of surface water flooding. The accompanying report from Hilson Moran states this is *"primarily due to local topography causing ponding and flow routes originating from Salvington Road and terminating near Long Croft Park... The EA's Long-Term Flood Risk Map predicts surface water flooding depths up to 30 cm across most of the site, with deeper flooding (up to 90 cm) confined to the southwest depression."*
- 6.12 Detailed modelling results confirmed flooding occurs across the site, with depths varying depending on the scenario. The Hilson Moran report confirms that *"Although a flood exclusion strategy cannot be achieved for the existing Thatch Cottage due to listing constraints, flood exclusion can be achieved for the two new dwellings, even for the 1 in 1000-year event, by setting the ground floor Finished Floor Levels (FFL) at 10.89 m AOD. For Thatch Cottage, raising ground floors is impractical due to its Listed status. Instead, a flood entry strategy is recommended, accompanied by the following measures:*
- Use of water-resistant materials within heritage constraints;*
  - Install sealed doors/windows and non-return valves in drainage systems, where practical.*
  - Elevate electrical systems, meters, and appliances above predicted flood levels.*



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- *Avoid ground-floor sleeping accommodation; with the first floor providing safe refuge.”*

6.13 With reference to Planning Practice Guidance (PPG), it is understood that there is no requirement for the development proposals to pass either the Sequential Test or the Exception Test. Nevertheless, the submitted FRA confirms that the Sequential Test is passed because the restoration of Thatch Cottage is only viable if funded by the two new dwellings on the same site, and no alternative sites can accommodate this requirement.

6.14 With respect to the Exception Test, the Hilson Moran documents also confirm that this is passed because of the following:

- *“Community benefits: The scheme restores a historic building, improves visual amenity, and contributes to housing supply.*
- *Safety: This FRA demonstrates occupiers remain safe for the development’s lifetime, with refuge on upper floors and safe egress routes to higher ground within 85 m.*
- *No increased flood risk elsewhere: TUFLOW modelling shows negligible off-site impacts (max depth increase 10–25 mm), with no significant change in hazard classification or risk beyond the site boundary.”*

6.15 With regard to the Drainage Strategy, it is noted that the scheme proposes a marked reduction in on-site permeable surfaces. However it is acknowledged that without mitigation, runoff would increase, and therefore a SuDS-based strategy is proposed.

6.16 The FRA clearly demonstrates that flood risk from the site only comprises current and future surface water flood risk, and that with the adoption of the proposed layout, design, and mitigation measures presented in in the FRA, occupiers of the site will remain safe from the current and future surface water flood risk. Additionally the proposals do not result in an increase in flood risk elsewhere. The Applicant is



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fully committed to carrying out any required mitigation measures and would be content for this to be ensured via a suitably worded condition. This application for 2no. new dwellings would be compliant with the NPPF and **Policy DM20** of the Worthing Local Plan.

Residential Amenity

- 6.17 The proposed houses would be positioned adjacent to Pond Lane, west of the host dwelling. To the west of the site boundary is a garage and vehicle parking/turning area that serves the adjacent cottages. These neighbouring properties are set a considerable distance away, and the proposals have in any case been designed to have no side facing windows.
- 6.18 To the immediate south of the site are semi-detached bungalows on Birkdale Close. It is acknowledged that these neighbouring properties have relatively short and small back gardens, however given that the proposed dwellings are situated to the north of Birkdale Close, it is not expected that the proposals would lead to loss of light to these neighbours. The proposed new houses would also be provided with private rear gardens of sufficient length, which when combined with boundary treatment and intervening vegetation, will ensure that the proposals will not lead to harmful levels of overlooking or loss of privacy to these neighbouring properties.
- 6.19 Consideration has also been given to the future occupiers of the refurbished Thatch Cottage. By setting the Thatch Cottage and the 2 no. new houses off the proposed mutual boundary, there is a reasonable separation distance provided between the flank of the easternmost semi-detached dwelling and the side elevation of the Thatch Cottage. It is not considered that the proposed siting, design and scale of the new semi-detached houses would lead to undue amenity impacts to the residents of the Thatch Cottage.



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6.20 In conclusion, it is our opinion that the proposal would not cause demonstrable harm to the residential amenities of any neighbouring property, and the application proposals would be compliant with **policy DM5** of the Worthing Local Plan, and the Council's SPD Guide for Residential Development.

Character

6.21 The NPPF and Policy DM5 of the Local Plan seek to promote good design that respects the qualities of the existing built environment. The design for the 2 no. new semi-detached houses has been carefully considered, with attention given to the comments received at the previous pre-application stage.

6.22 It is acknowledged that the proposals will create a change to the streetscene, with the loss of side garden space that forms part of the curtilage of a heritage asset. However the sensitive approach to design, siting and scale ensures that the development will sit comfortably with the host dwelling, and will also appear as an attractive and cohesive feature in the streetscene.

6.23 The accompanying Heritage Statement explains that the new dwellings *“have been designed to blend with the local building character of historic Durrington Farmhouse opposite, in a similar way to the recent development of nos. 7 & 9 a little further to the west. These will be set back from the existing front boundary wall, respecting the building line of Thatch Cottage... The elevations will be in coursed flint with red brick quoins and dressings, traditionally styled casement windows and doors, under a steep pitched clay tile roof.”* To the east of Thatch Cottage, it is proposed to provide a off-street car parking area to serve Thatch Cottage and the 2no. new dwellings. This will be opened up a little from the eastern approach to ensure adequate space is available to provide parking and turning areas adequate to serve all three dwellings. However, the overriding verdant character will be retained.



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6.24 In conclusion, it is our opinion that the proposed development would represent a high quality development in this location, which would appear perfectly in keeping with existing development and would not detract from the character of the surrounding locality. The application proposals therefore comply with the NPPF and **Policy DM5** of the Worthing Local Plan.

Future Occupiers Living Conditions

6.25 The proposed houses would project further to the rear than Thatch Cottage, but the layout and garden area adequate for 2 x 3-bed dwellings is considered to be entirely adequate given the size of the new houses. Indeed the garden areas are similar if not larger than those provided for the two cottages that lie to the immediate west (No's 7 and 9), and as noted above, there is evidence of smaller gardens to some properties on Birkdale Close to the south. The houses have been designed with their outlook from habitable rooms orientated towards the front and rear. Therefore it is considered that the living conditions of future occupants would be adequate in terms of garden space and outlook. The development would therefore comply with Policy DM5 of the Local Plan, in so far as it relates to potential users of the site.

6.27 The proposed houses, each having a gross internal floor area measuring 93.01 sqm, have been designed internally to meet the requirements laid out in the Governments 'Technical Housing Standards - nationally described space standard' document.

Access & Parking

6.28 The application proposal will be served via an existing crossover to Pond Lane. The access will lead to an improved existing car parking and turning area, where there will be sufficient space for the parking of at least 5 vehicles. Space for refuse store and cycle stores are provided for each dwelling, as detailed on the submitted plans.

6.29 Further car parking is available nearby at the public car park off Pond Lane that serves the recreation ground.



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6.30 The proposals would accord with **Policies DM5(a)(vi)** of the Worthing Local Plan in that the proposals will not give rise to any traffic or transport concerns.

Trees

6.30 A Tree Report accompanies this application. This confirms that *“Low-quality trees 2, G3 (partial), 4-6, G7 & 18-20 will be removed to allow or facilitate development. The loss of these trees is a low and acceptable impact and is likely to have a minimal amenity impact on the surrounding area. There is also some scope for replacement planting on site if deemed necessary...”*

6.31 The Tree Report makes recommendations in relation to hardsurfacing areas, with some areas advised to be surfaced to a porous specification and/or ‘No Dig’. These matters can be dealt with satisfactorily via a suitably worded planning condition if deemed appropriate.

6.32 The Arbortrack Tree Report confirms that *“The great majority of site works will take place beyond the RPA of retained trees and canopies. Retained trees will be protected throughout the course of development by fencing to the specification recommended by BS5837:2012”*.

Ecology

6.33 The Application is supported by a Bat Scoping Report, which has been prepared by the Ecology Co-op. Having undertaken 2 site surveys, the report confirms that *“the suitability of the building to support roosting bats is rated as ‘negligible’... considering the condition of the building and its context within suitable foraging habitat for bats. As such, it is concluded that the proposed development will not impact on roosting bats, and no further surveys are recommended in this instance... To mitigate disturbance to foraging and commuting bats from artificial lighting, the proposed development should include an ‘ecologically sensitive lighting scheme’ in*



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*accordance with guidance produced by the Bat Conservation Trust... should lighting be proposed.” It is understood that this issue can be dealt with by condition.*

Biodiversity Net Gain

- 6.34 The Ecology Co-op have provided the necessary BNG documents, and these are submitted in support of the planning application. This confirms that “The Statutory Biodiversity Metric calculation has demonstrated that the proposed scheme will result in a likely net loss of 0.53 habitat units (-37.26%)... The current scheme does not satisfy the trading rules within the Statutory Biodiversity Metric. The current scheme does not achieve a 10% net gain. In addition, the calculation has identified a ‘Medium Distinctiveness Broad Habitat Deficit’ of 0.46 Habitat Units and a ‘low Distinctiveness Broad Habitat Deficit’ of 0.07 Habitat Units.”
- 6.35 Therefore in order to satisfy the BNG requirements, the Applicant is aware of the need to purchase off-site credits. It is understood that this can be dealt with by condition.

Sustainable Construction/Energy Efficiency

- 6.36 The proposed residential units will be designed to utilise sustainable and energy efficient construction measures. In this context it is demonstrated that the proposed development would accord with Local Plan **policies DM16** and **DM17**.

Community Infrastructure Levy

- 6.37 It is understood that Worthing Borough have adopted CIL, which is now the dominant means for securing financial contributions from development in the Borough. CIL is charged in £ per square metre and is levied on the gross internal area (GIA) of the liable development. The CIL charge depends on the size, type and location of the development proposed. The Council’s revised charging schedule (August 2021) advises that residential development of 10 dwellings or less a levy of £125 per sqm will be applicable.



## 7 CONCLUSIONS

- 7.1 The Application Site is situated within the defined built-up area boundary in a sustainable location. The principle of new housing development is therefore accepted subject to other policies in the Development Plan.
- 7.2 The main consideration in this case is the need to refurbish the fire damaged Listed building, Thatch Cottage. Heritage consultants, Manorwood, have been instructed to engage with the Borough Council and design a scheme for new housing on the curtilage of the heritage asset. The proposals have been re-designed following input from the Council's Planning and Conservation Officers.
- 7.3 The owner of the Thatch Cottage has been in discussions with a local developer to establish the minimum level of development of the site that would be necessary to subsidise the reinstatement of the listed building. Although this scheme is not 'enabling development', Manorwood's 'Case for Development' illustrates the realistic minimum development necessary on the site in order to generate sufficient funds to save the listed building and return it to its optimum viable and beneficial use.
- 7.4 Manorwood explain in their Heritage Statement that *"It is difficult to envisage a successful, publicly beneficial future for the listed building, should there be immovable opposition to a pragmatic, admittedly compromising solution... The accompanying drawings illustrate the proposed construction of a pair of 3-bedroom semi-detached cottages in the grounds to the west of the listed building and to rebuild the listed building to its former internal plan form and external appearance."*
- 7.5 Manorwood go on to confirm that *"Whilst it is acknowledged that this development proposal does constitute less than substantial harm to the setting of the designated asset... it is considered that this harm is at the lower end of less than substantial"*



*and is outweighed by the public benefit in saving the heritage asset... the need to find a scale of development that presents the minimum viable release of capital to save the heritage asset is considered to outweigh [any planning] challenges... The proposed development should be permitted to fully fund the necessary repair works and secure the listed building because the dis-benefits of departing from some normal planning policies are outweighed by the benefits of conserving the asset."*

- 7.6 It is our opinion that in any case, the sensitively designed revised proposals for this site take into account the comments received from the Local Authority Planning Officer and Conservation Architect, and ensure that the new houses will not appear as an overdevelopment or visually cramped, and they will sit comfortably within the streetscene. The proposals have been carefully designed to ensure that impacts on neighbouring residents are minimal, whilst future occupiers would be provided with an acceptable standard of accommodation.
- 7.7 The Applicants have instructed a range of specialist consultants, including those dealing with flood risk and drainage, trees, protected species and biodiversity net gain. The accompanying reports confirm that there are no grounds to resist the development having regard to these matters. Adequate vehicular access is provided with an improved area for car parking and turning.
- 7.8 The proposal comprises sustainable development, and it is our opinion that the overwhelming weight of evidence supports the proposal as it is shown to comply with the aims and objectives of national and local planning and conservation policy. Permission should therefore be granted.

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November 2025