

DESIGN, ACCESS & PLANNING STATEMENT

IN RELATION TO:
***‘PROPOSED 2-STOREY OFFICE EXTENSION TO
SOUTH ELEVATION OF EXISTING CARE HOME
BUILDING. RECONFIGURATION OF EXISTING
FLOORSPACE TO CREATE 4 NO. NEW
BEDROOMS FOR CARE HOME USE’***

**WESTHOLME CLINIC, 10 CLIVE AVENUE,
GORING-BY-SEA, WORTHING, BN12 4SG**

JULY 2026

(i) INTRODUCTION & EXECUTIVE SUMMARY

This Statement is submitted in support of a detailed planning application. The application proposes the erection of a 2-storey extension to the south side of the existing care home, known as 'Westholme Clinic'. The proposed office building will serve as the dedicated administrative and operational hub for Westholme Clinic and its associated companies. Functions to be accommodated include care management, HR, finance, compliance, staff training and senior leadership. Due to the multi-faceted nature of the organisation, these are not generic office uses that could be located anywhere — they are functions that must be physically co-located with the care facility they support.

The application is presented with a full package of proposed and existing drawings, including location and block plans, floor plans and elevations. These have been prepared by the applicants' architects. In addition, the planning submission is supported by the following technical documents: -

- Energy & Sustainability Statement, prepared by ERS Consultants Ltd.
- Preliminary Ecological Appraisal, prepared by The Ecology Co-op.
- Biodiversity Impact Calculation, prepared by The Ecology Co-op.
- BNG Statutory Metric, prepared by The Ecology Co-op.
- Arboricultural Impact Assessment & Method Statement, prepared by Arbortrack Systems Ltd.
- SuDS & Foul Drainage Statement, prepared by gta Civils and Transport.

(ii) DESIGN & ACCESS STATEMENT

(a) Use

The site is currently a care home (C2 use class) providing a total of 52 bedrooms, with associated office and storage space associated with the running of the home.

The proposal intends to create a new office building, which will serve as the dedicated administrative and operational hub for Westholme Clinic and its associated companies. Functions to be accommodated include care management, HR, finance, compliance, staff training and senior leadership.

Westholme Clinic is a functioning care facility with a growing workforce and increasing operational complexity. The administrative and managerial functions of the organisation are currently housed in spaces that were originally designed and built as residential bedrooms. These rooms are fundamentally unsuitable for office use: they are too small, poorly connected, lacking in natural light for sustained desk-based work, and unable to accommodate the equipment and collaborative working practices that modern care administration demands.

The consequence of this is a fragmented and inefficient working environment. Meeting rooms, training facilities and operational workspaces are currently spread across multiple areas of the main building, creating unnecessary movement and barriers to effective communication between teams. There are insufficient staff welfare facilities — including staff rooms, breakout areas, meal spaces and WC provision — which falls short of the standards expected of a modern employer and places unnecessary strain on staff retention and wellbeing.

The proposed office building directly addresses these failings. It will consolidate all administrative and managerial functions into a single, purpose-designed space, freeing up rooms within the main building for their intended residential use. This is

not speculative development — it responds to an existing, demonstrable operational need that is constraining the quality of both care delivery and staff experience.

The Applicant's confirm that *"The proposed office building will serve as the dedicated administrative and operational hub for Westholme Clinic and its associated companies. Functions to be accommodated include care management, HR, finance, compliance, staff training and senior leadership. Due to the multi-faceted nature of the organisation as a whole, these are not generic office uses that could be located anywhere — they are functions that must be physically co-located with the care facility they support.*

The nature of regulated care delivery requires that managers, administrators and clinical leads are immediately accessible to frontline care staff and, where necessary, to residents and their families. Operational decisions — including staffing, medication management, safeguarding and care planning — often require rapid, face-to-face communication. Relocating these functions off-site would introduce delays, reduce oversight and create risk, both to the quality of care and to regulatory compliance.

Westholme does not have access to alternative sites. No other land or premises in the locality are available to the organisation, and there is no suitable space within the existing building that could be repurposed without compromising resident accommodation or care delivery. On the contrary, the intention is for the new office building to release the spaces currently misused as offices back to residential use, delivering a net gain in care capacity. The proposed development is therefore both necessary and site-specific."

(b) Amount

The proposed 2-storey extension is of very similar scale to the existing building, and it will appear entirely subordinate to the current principal structure on the site.

The total proposed additional floorspace that would be created by this application is 302 sqm.

(c) Layout

In terms of the site layout, the extension will be located south of the existing building and would not be positioned any further forward towards the street scene than the existing building. In relation to the internal layout, the building will comprise 3 No. offices, an open plan office space, kitchen and w.c. at ground floor level, with a further 4 No. offices, meeting room, kitchen and w.c. at first floor level.

(d) Scale

The office extension will be two storeys in height, with a design approach that would sympathetically relate to the main building in terms of scale, form, siting and design.

(e) Landscaping

A new 1.8m high timber fencing is proposed to the site boundary, as detailed on the submitted plans. The proposals also provide new hard landscaping comprising Marshal paving slabs for paths and patio areas (colour and size of slabs to be confirmed). With the addition of soft landscaping, this will result in a visual enhancement, creating an improved environment for residents, staff and visitors like. With development on the southern and western sides of the site, set no further forward (west) than the existing care home building, then the open plan frontage/ corner at Clive Avenue and Barrington Road retains the open plan estate feel to the original development of the street.

(f) Appearance

The development proposal will be in keeping with and complement the host building in scale, form, siting, design and use of materials.



Fig 1. 3D Landscape View



Fig 2. 3D Landscape Views

The proposal would comprise a two-storey flat roofed extension, which would be the same height as the host building, ensuring that the proposals respect the existing form and appearance of the care home buildings. Great care and attention will be

given to the articulation, proportion and rhythm of the openings to the extension. It is acknowledged that although the existing building has no particular architectural merit, it does have a certain pattern and uniformity to its fenestration, which this development proposal seeks to respect. The result is an addition that is in keeping and breaks up any horizontal emphasis of the building.

(g) Access

The site has good access to local shopping facilities, and in addition has good public transport links for staff and visitors.

The building has been designed for inclusive access for all, including employees. Patients and employee lifts and Disabled access w.c.

(iii) PLANNING SUPPORT STATEMENT

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a detailed planning application. The application proposes the erection of a 2-storey office building to the south side of an existing care home, known as 'Westholme Clinic'.
- 1.2 The Planning 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.

2. SITE CONTEXT

- 2.1 The application building, which is the subject of this planning application, comprises a purpose-built residential care home facility (C2 use class), providing a total of 52 bedrooms (19 at ground floor, 33 at first floor). In June 2021, planning permission was obtained on this site for a 2-storey extension to provide extra bedrooms for the care home (AWDM/0775/21 refers). Although some conditions were discharged (split decision issued in October 2023 – see AWDM/0943/22), the works were not implemented and this permission has now lapsed.
- 2.2 The total site area measures approximately 0.4 hectares. Vehicular access to the site is via Barrington Road to the north, with an access leading to a parking area for 11 vehicles. It is noted that surrounding residential roads have unrestricted on-street car parking available.



Fig 3. Aerial map showing the site and its surroundings (courtesy of Promap)

- 2.3 The premises is located on a corner site, adjoining Clive Avenue to the west and Barrington Road to the north. West Park School adjoins the site to the south side, whilst the school's open playing fields lie to the immediate east side of Westholme Clinic.
- 2.4 Aside from the educational use adjacent, the site lies in a primarily residential area, with surrounding properties varied in their character with both Barrington Road and Clive road comprising a mixture of bungalows, chalets and 2-storey properties.
- 2.5 In terms of site designations, the application site is located within the defined built-up area boundary for Worthing. To our knowledge, no other constraints or restrictions relate to the site.

3. PLANNING HISTORY

3.1 According to the Council's online planning register, Westholme Clinic has the following planning history: -

- **Planning ref: AWDM/0943/22/:** Application for approval of details reserved by conditions 3 (materials schedule and samples), 4 (external surfacing), 7 (foul sewerage), 8 (surface water drainage), 9 (surface water maintenance) and 11 (CMS) of previously approved AWDM/0775/21. Split Consent 16th October 2023.
- **Planning ref: AWDM/0919/22/:** Application for a Non-Material Amendment to previously approved AWDM/0775/21. Amendment: Minor roof extension to provide lift shaft over-run, roof mounted solar panel (PV) array. Application Permitted 29th December 2022.
- **Planning ref: AWDM/0813/22/:** Proposed portacabin for a temporary (1 year) period to north of site. Application Permitted 11th July 2022.
- **Planning ref: AWDM/0775/21/:** Proposed 2-storey extension to south elevation of existing care home to provide 19 bedrooms, and detached single storey staff/ office block to the north west side of the site. Provision of new secure cycle store for 10 bikes (resubmission of AWDM/0702/20). Application Permitted 17th June 2021.
- **Planning ref: AWDM/0702/20/:** Proposed 3 storey extension to south elevation of existing Car Home to provide an additional 16 en-suite bedrooms and associated communal office and training space. Provision of new secure cycle store for 10 bikes. Withdrawn Application 27th August 2020.
- **Planning ref: AWDM/0242/17/:** Application to vary condition 1 of previously approved AWDM/1764/16. Amendment to increase size of freestanding conservatory from 6ms to 8ms. Application Permitted 23rd March 2017.
- **Planning ref: AWDM/1764/16/:** Free standing conservatory to house new Bone Scanning Facility with access ramp. Application Permitted 17th January 2017.
- **Planning ref: 04/01473/FULL/:** Erection of a PVCU conservatory to the side elevation. Application Permitted 9th February 2005.



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- **Planning ref: 03/00115/FULL/:** Extension to east elevation to provide administrative office accommodation. Application Permitted 4th April 2003.
- **Planning ref: 02/01350/FULL/:** Installation of a portacabin for a temporary period for use as a doctors office and consulting rooms. Application Permitted 15th January 2003.
- **Planning ref: 96/05205/FULL/:** Installation of replacement double glazed windows. Application Permitted 29th May 1996.



4. THE PROPOSED DEVELOPMENT

- 4.1 The proposal seeks planning permission for the erection of a 2-storey side extension to the existing care home ('Westholme Clinic'). Below is the previously approved site plan under ref: **AWDM/0775/21** and the site plan, as now proposed.



Fig 4. AWDM/0775/21 Site Plan (Approved)

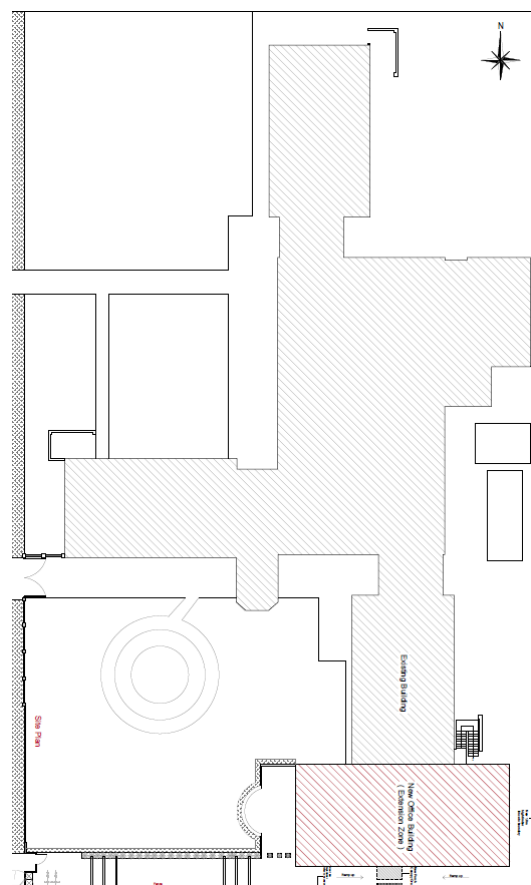


Fig 5. Proposed Site Plan

- 4.2 The office extension to the south side will serve as a dedicated administrative and operational hub for Westholme Clinic and its associated companies. Associated with this extension, the proposals allow for the reconfiguring of existing floorspace within the existing building, which will facilitate the repurposing of rooms currently used as offices back to their intended residential use, increasing care capacity

without the need for a larger footprint. There is therefore a net gain of four additional residential bedrooms for care home use.

- 4.3 In relation to the proposed internal layout, the extension area will comprise 3 No. offices, an open plan office space, kitchen and w.c. at ground floor level, with a further 4 No. offices, meeting room, kitchen and w.c. at first floor level.
- 4.4 The proposed material schedule would be as follows: -
- Brickwork and white render elevations to closely match existing building.
 - Bay below window openings will be finished in either white weatherboard cladding (to match existing) or white brickwork.
 - Either powder-coated white aluminum double glazed casement windows (white – RAL Colour tbc.) trickle vents in staff wing. Full height glazing and associated doors – Aluminum
 - Powder coated (grey) aluminum parapet capping.
- 4.5 The development proposal would comprise a floor area of 302 sqm. The existing total floor area is 1,722.5sq m (existing care home floor area 1,704.4sqm; existing Sussex Osteoporosis clinic building floor area 18.1 sqm).
- 4.6 New 1.8m high timber fence is proposed to the site's boundary, as detailed on the submitted drawings. The existing access and parking arrangements will remain unchanged as a result of the proposed development, with 11 no. parking spaces on site. A new secure cycle store is proposed to serve employees and visitors, with provision of 10 no. cycles.
- 4.8 In terms of employment, the proposals will lead to an additional 4 members of full-time equivalent staff being employed (two additional full-time equivalent care staff and two additional full-time equivalent administrative and clerical roles). The level of proposed employment is unchanged from the 2021 application.

5. POLICY CONTEXT

(i) The National Planning Policy Framework (NPPF)

- 5.1 The National Planning Policy Framework (NPPF) was originally published in 2012, there have been a number of revised versions since this time, with the most recent being 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 to 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 in order 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).
- 5.4 The economic objective states that *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available*

in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”.

- 5.5 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”.

- 5.6 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”.*

- 5.7 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 Section 6 relates to building a strong, competitive economy. Paragraph 85 states that *“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”*.
- 5.9 Section 8 relates to Promoting healthy and safe communities. Paragraph 96 states that *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*

c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”.

5.10 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.

5.11 Paragraph 113 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport”.*

5.12 Paragraph 115 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide:

“a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”.

- 5.13 At paragraph 116 the Framework also 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...”.*
- 5.14 Section 11 is entitled ‘Making effective use of land’. Paragraph 124 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”.*
- 5.15 Section 12 refers to achieving well-designed places. Paragraph 131 states that *“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, creates better places in which to live and work and helps make development acceptable to communities”.*
- 5.16 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

5.17 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 such as design guides and codes. Conversely, significant weight should be given to:*

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

5.18 Further parts of the Framework that are of particular note include Section 14, which relates to meeting the challenge of climate change, flooding and coastal change and Section 15, which refers to the desire for development to conserve and enhance the natural environment.

(ii) Worthing Local Plan 2023

- 5.19 The Worthing Local Plan (2023) now forms part of the statutory development plan, which sets the strategic development and land-use priorities for Worthing (outside the South Downs National Park) up to 2036, and contains the policies against which development management decisions within that area will be made. The Local Plan supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 5.20 According to Worthing Local Plan 2023 – Interactive Map the application site is located within the defined built-up area boundary for Worthing. To our knowledge, no other constraints or restrictions relate to the site (refer to **Fig 6**).

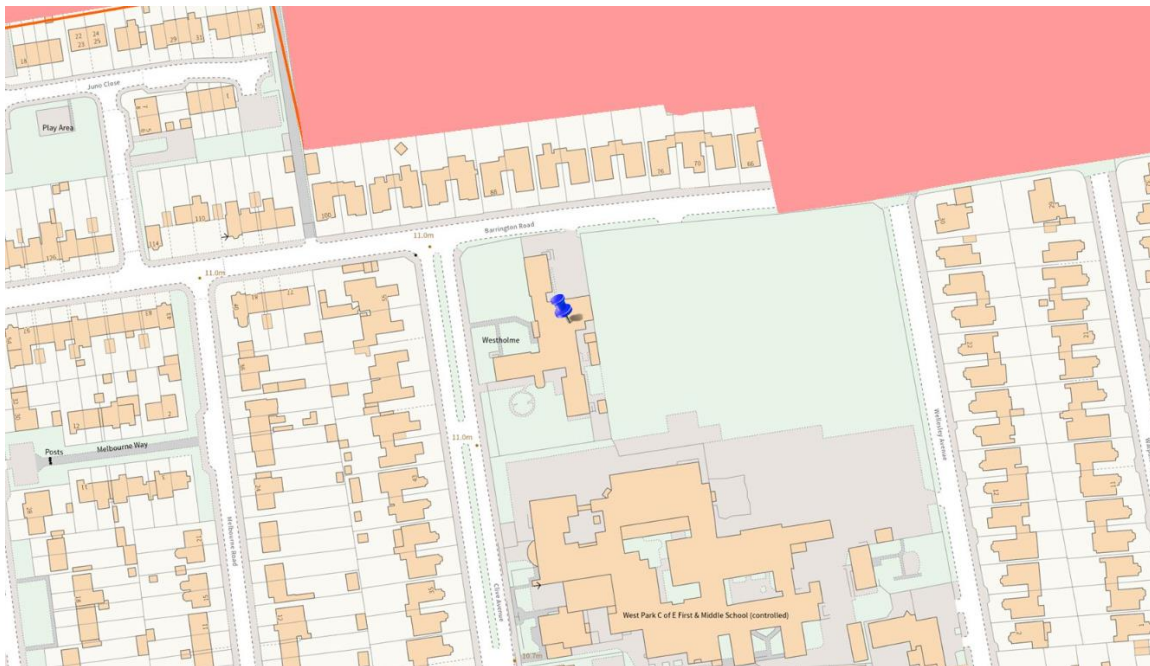


Fig 6. Extract from Worthing Local Plan 2023 – Interactive Map

- 5.21 There are no policies within the Worthing Local Plan, which specifically relate to Care Home facilities – although the supporting text to Policy DM1 ('Housing') does acknowledge the ageing population and higher levels of disability and health problems amongst older people, which will necessitate specialist housing options,

to include care home. Additionally, the following policies are considered to be of relevance to this Planning Application:-

- 5.22 **Policy SP1** is a general policy, which relates to presumption in favour of sustainable development. It states that *“planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay”*.
- 5.23 **Policy SP3** (‘Healthy Communities’) says that *“The Council will support proposals for new and improved health services and facilities in locations where they can be accessed by sustainable transport modes”*.
- 5.24 **Policy DM5** relates to the Quality of the Built Environment. It states that: -
“a) All new development (including extensions, residential annexes, alterations, ancillary development, change of use and intensification) should:
i) be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area. This will include consideration of proportion, form, design, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping;
ii) enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping, tree canopy, impact on street scene and layout of the development;
iii) make a positive contribution to the sense of place, local character and distinctiveness of an area;
iv) respect, preserve and where appropriate enhance, heritage assets and settings;
v) be well built, accessible, fit for purpose, and adaptable to changing lifestyle, demography and climate;
vi) include a layout and design which: take account of potential users of the site; create safe conditions for access, egress and active travel (walking and cycling)

between all locations; provide good links to integrated public transport; and have acceptable parking arrangements (in terms of amount and layout); vii) make a positive contribution to creating a safe and secure environment by integrating measures for security and designing out opportunities for crime;

viii) not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise giving rise in significant adverse impacts, or vehicular movements resulting in severe cumulative impacts on the road network, or loss of important open space of public value (unless it satisfies any of the exceptions set out under Policy DM7 – Open Space, Recreation and Leisure);

ix) respect the existing natural features of the site, including landform, trees and biodiversity and contribute positively to biodiversity net gain. Where appropriate, this will include the protection and integration of existing trees and green infrastructure into new developments; x) ensure that lighting incorporated into developments provides the minimum for public safety, is energy efficient and avoids light pollution...

... Ensuring Good Design

d) Development must reflect government guidance on design and take into account any local design guidance and supplementary planning documents such as design guides and codes. Weight will be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally, so long as they fit in with the overall form and layout of their surroundings”.

- 5.25 **Policy DM11** (‘Protecting and Enhancing Employment Sites’) says that “*existing premises and land or floorspace which is used, or was last used, for use employment uses will be protected*”. The supporting text to this policy highlights local employment needs, and confirms that “*it is essential that there is flexibility in approach to allow for new forms of economic activity and employment.*”

5.26 The following policies are also of some relevance: -

- **Policy SP2:** Climate Change
- **Policy DM9:** Delivering Infrastructure
- **Policy DM10:** Economic Growth and Skills
- **Policy DM15:** Sustainable Transport and Active Travel
- **Policy DM16:** Sustainable Design
- **Policy DM17:** Energy
- **Policy DM19:** Green Infrastructure
- **Policy DM20:** Flood Risk and Sustainable Drainage

(v) Supplementary Planning Documents

5.27 The Climate Change Act 2008, commits the UK to bring all greenhouse gas emissions to net zero by 2050. Adur & Worthing Councils declared Climate Emergency in July 2019 and has committed to work towards becoming carbon neutral by 2030. The Councils have also signed the UK100 Cities Pledge to achieve 100% clean energy by 2050. The Council have prepared a climate change checklist to provide guidance for developments, reflecting the higher standards in the emerging Worthing Local Plan. Amongst other things, all new developments will be expected to incorporate design measures to maximise opportunities for natural ventilation and summer cooling to reduce vulnerability to overheating.

6. PLANNING ASSESSMENT

a. Principle of Development & The Need for Office Accommodation

- 6.1 The application site is defined by the Worthing Local Plan 2023 – Interactive Map as being located within the defined settlement boundary. To our knowledge, no other planning restrictions/constraints relate to this site. According to the Environment Agency online flood map, the site does not lie within Flood Zones 2 or 3, and therefore is not identified as being at risk of flooding. There should be no objection in principle to the expansion of the existing residential care home to provide an on-site office building.
- 6.2 This application follows a previous permission on the site for ‘*proposed 2-storey extension to south elevation of existing care home to provide 19 bedrooms, and detached single storey staff/office block to the north west side of the site. Provision of new secure cycle store for 10 bikes (resubmission of AWDM/0702/20)*’, which was permitted in June 2021 (ref: **AWDM/0775/21**). Some planning conditions were discharged (split decision issued in October 2023 – see **AWDM/0943/22**), but the works were not implemented, and this permission has now lapsed.
- 6.3 Our client has confirmed that “*the previously approved scheme proposed an increase in the number of residential beds. Following detailed engagement with local commissioning bodies, it became clear that the anticipated demand from our specific client base would not justify that level of capacity at this time. Rather than proceeding with a development that could result in vacant or underutilised space, the decision was made to redirect investment more strategically...The integration of additional residential capacity into the existing main building — where it can be delivered more sensitively and with less visual impact on the site — represents a better long-term outcome for residents, staff and the surrounding area. This revised approach also unlocks a significant operational benefit: by reconfiguring spaces within the existing building, we are able to repurpose rooms currently used as offices*

back to their intended residential use, increasing care capacity without the need for a larger footprint...The single-storey office block approved for the west lawn remains justified in principle. However, the internal reconfiguration of the main building now necessitates a two-storey office extension in order to accommodate all of the staff, administrative functions and support facilities that the service requires to operate effectively. This is not a change of direction — it is a refinement that delivers a more efficient, sustainable and appropriate outcome for the site”.

- 6.4 The proposal seeks permission for a modern two storey extension to the south side of the existing care home to provide updated office facilities. The proposal is specifically responding to on-site demand. Our clients note that *“the nature of regulated care delivery requires that managers, administrators and clinical leads are immediately accessible to frontline care staff and, where necessary, to residents and their families. Operational decisions — including staffing, medication management, safeguarding and care planning — often require rapid, face-to-face communication. Relocating these functions off-site would introduce delays, reduce oversight and create risk, both to the quality of care and to regulatory compliance.*

Westholme does not have access to alternative sites. No other land or premises in the locality are available to the organisation, and there is no suitable space within the existing building that could be repurposed without compromising resident accommodation or care delivery. On the contrary, the intention is for the new office building to release the spaces currently misused as offices back to residential use, delivering a net gain in care capacity. The proposed development is therefore both necessary and site-specific”.

- 6.5 It is considered that the site, by virtue of its established use, location and relationship with the surrounding built form can fully support the type of development proposed.
- 6.6 Currently Westholme Clinic has 50 employees (39 full time equivalent), with most directly engaged in delivering frontline care. The scale of this workforce, and the

limited administrative floorspace currently available at the site, highlights the need for improved dedicate administrative support on site. The Applicant's confirm that *"The proposed development will directly generate new employment in two distinct ways.*

- First, the reconfiguration of the main building will deliver a net gain of four additional residential bedrooms. Providing safe, well-staffed care for these additional residents will require a minimum of two additional full-time equivalent care staff, adding directly to the local workforce in a sector where skilled employment opportunities are consistently valued.

- Second, the new office building will enable the creation of two additional full-time equivalent administrative and clerical roles. These posts exist as an identified need within the organisation but cannot currently be filled due to the absence of appropriate workspace. The new building removes that constraint and allows the organisation to grow its support functions in line with its operational requirements. In total, the development will create a minimum of four new full-time equivalent positions, with the realistic prospect of further growth as the organisation expands. This represents a tangible economic benefit to the local area and supports Worthing Borough Council's objectives around employment growth and the sustainability of the care sector."

- 6.7 The NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also expects that planning policies and decisions will promote an effective use of land in meeting the need for homes and other uses. The NPPF also supports care home provision as part of overall housing supply and notes that this may also allow other housing to be re-used by other households. Accordingly, there is no in principle objection to the expansion of the existing facilities to provide improved care home accommodation within the main building and an office extension to serve the care home use.

b. Visual Amenities

- 6.8 The existing building comprises a modern purpose-built residential care home facility. The building is predominately two storeys in height with a flat roof. In considering previous proposals on the site, Planning Officer informally advised that the existing care home is sited within spacious landscaped grounds that appear to have been deliberately laid out to create a very open feel to the corner at the junction of Clive Avenue and Barrington Road.
- 6.9 The Planning Officer previously confirmed that the building itself has no particular architectural merit, however *"It's 2-storey flat-roofed form is very simple, with the pattern and uniformity of its fenestration treatment being its most distinctive feature, breaking up the horizontal emphasis of the building throughout. The space around the building is important and helps the building assimilate comfortably within its low key residential surroundings, consisting of bungalows on the west side of Clive Avenue and Barrington Road to the north, and West Avenue Primary School adjoining to the south and east. The School buildings consist of a mix of 1 and 2-storey elements but with those buildings closest to the care home site primarily single-storey in scale."*
- 6.10 The development proposal follows a previous proposal on the site for *'proposed 2-storey extension to south elevation of existing care home to provide 19 bedrooms, and detached single storey staff/office block to the northwest side of the site. Provision of new secure cycle store for 10 bikes (resubmission of AWDM/0702/20)'*, which was permitted in June 2021 (ref: **AWDM/0775/21**). It will be noted from the plans below that the allowed (but unimplemented) permission was for a much larger extension.

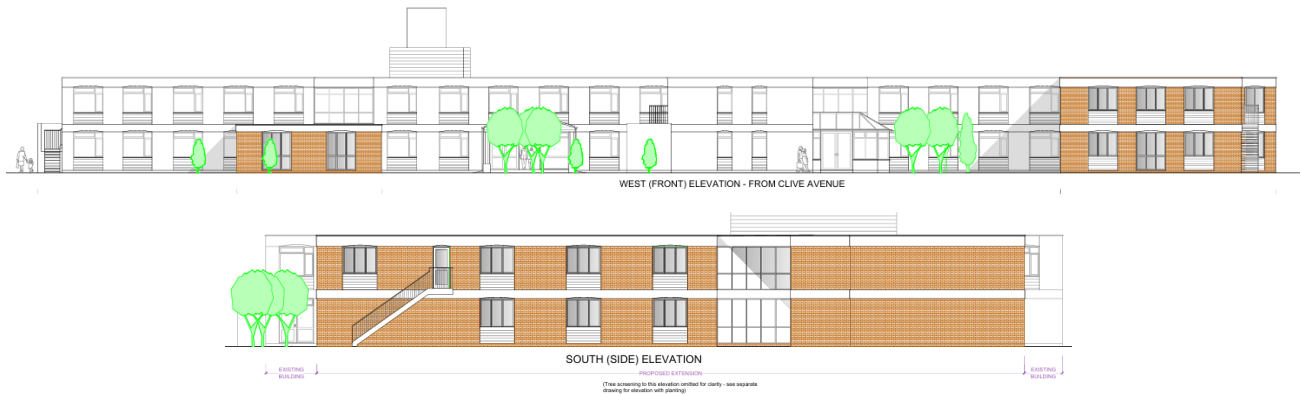


Fig 7. Approved West and South elevations (approved via AWDM/0775/21)



Fig 8. Proposed West and South elevations

6.11 At the time of this previous Planning Application being considered, the Council considered the issue of visual amenity, stating that *“on the whole it is considered the current proposals have successfully responded to the concerns raised in respect of the previously withdrawn application. The siting of the eastern component of the proposed 2-storey extension only 1m from the site boundary is not ideal but comprises a relatively modest element of the overall building mass and would be partly screened by the new hedge-planting in front (west) of it. Although an exposed 9m long section of blank 2-storey wall will be visible in oblique views from Clive Avenue across the relatively open expanse of playground and grassed border within*

the adjoining School grounds, it would not be an overly dominant feature within the street scene, being set well back from the road frontage by some 37m.

Overall it is considered the proposals will integrate cohesively and respectfully with the appearance of the existing building, and low key, domestic character of the surrounding area. Integral to this success will be the implementation of high quality hard and soft landscaping to the external areas”.

- 6.12 The current development proposal is significantly reduced in scale, when compared with the previously approved Planning Application proposals. In all respects the current proposals will match the detailing, proportions, pattern and rhythm exhibited by the host building. The additions will therefore blend with the existing building appearing entirely cohesive and respectful in architectural terms. Further, the extension would be constructed in materials to match the main building, allowing a level of visual subservience to be achieved. The proposals will not overdominate or be out of scale with the existing care home, and instead provides a sensitive design solution that seeks to make an efficient use of the site, without detrimentally impacting on the important visual characteristics of the site and its immediate environs. Both the internal layout of the building, and the external layout of the site, have been carefully considered to ensure a high-quality environment is achieved.
- 6.13 The spacious corner to Clive Avenue and Barrington Road would remain open and undeveloped. The new addition would be set no further forward than the existing front (westerly) projecting element to the care home. The proposal would also be set back behind this existing projecting part of the building.
- 6.14 The surrounding area comprises a variety of residential properties, comprising a mixture of detached, semi-detached and terraced properties. These are generally one and two storeys in height; although there is evidence of some two-and-a-half/ three storey buildings within the wider area. There are also a number of mixed uses

within the surrounding locale, which includes the adjoining West Park School and Kamelia Kids Day Nursery and Beach School further south.

- 6.15 The proposed extension has been carefully designed and would appear in keeping with the existing built form. They would preserve the important characteristics and appearance of the surrounding area. The proposals would meet the high standards of design required by national planning policy within the NPPF and accord with **policy DM5** of the Local Plan, which requires “*all new development (including extensions, residential annexes, alterations, ancillary development, change of use and intensification) should: i) be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area. This will include consideration of proportion, form, design, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping...*”.
- 6.16 In summary, we consider that the existing spatial pattern of development and visual amenities of the streetscene will not be adversely affected by the proposals. There would be no detrimental impacts on neighbouring properties, the local highway network or any other material planning consideration. Significantly, the proposals would provide improved and much needed, modern on-site office facilities to serve the existing care home facilities. Our clients have advised us that these additional office facilities are much needed and would greatly enhance the existing on-site provision. It is our view that the proposal would fully comply with government guidance in this respect, which seeks to promote healthy and safe communities.
- c. Residential Amenity
- 6.17 As detailed above, the application site is located on a corner plot, adjoining Barrington Road to the north and Clive Avenue to the west side. West Park School adjoins the site to the south side, whilst there is open space to the immediate east side.

- 6.18 The proposed 2-storey extension would be focussed towards the south of the site. It is clear that the proposal is set well away from residential properties, with the closest building being West Park School to the south. It will be recognised that a school used is primarily used between the hours of 9am and 3pm, and as such, there would be no issues with inter-visibility and privacy during late afternoon/ evening.
- 6.19 Notwithstanding the above, great care and consideration has been paid to careful window placement. The planning proposal provides 4 x first floor and 4 x ground floor window to the southern elevation. All the first-floor windows would be obscure glazed below 1.7m AFFL and our client would be happy for this to be conditioned accordingly. Further, there is space provided to the south boundary to accommodate meaningful planting, if desired, to provide an effective screen whilst providing residents with soft, verdant outlook.
- 6.20 Importantly, no concerns were raised regarding residential amenity at the time of the previous application being considered. Further, the previous proposal related to accommodation, rather than the current office use.
- 6.21 The proposals have been carefully designed, to ensure that the relationship with neighbouring buildings and uses is respected. It is accepted that the proposal will result in an increase in the use of the site, with the generate of 4 No. additional full time staff, however in our view this is likely to be negligible and would not cause sufficient harm to outweigh the clear, tangible benefits of providing new modern officer facilities within the care home. Further, the proposed level of employment is identical to that proposed as part of the 2021 application. It is concluded that the proposal would not cause demonstrable harm to the residential amenities of any neighbouring building by way of noise or disturbance. The proposal would be fully compliant with **Policy DM5** of the Worthing Local Plan.

d. Access and Parking

- 6.22 NPPF Paragraph 116 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** (my emphasis)”*.
- 6.23 It is important to recognise the existing Westholme Clinic care home as a traffic generator in its own right, currently providing a total of 52 bedrooms with ancillary office and other facilities for staff. The proposals will provide an additional 4 bedrooms in the main building. However, the proposed office facilities to be provided are unlikely to create additional movements to and from the site, or require additional car parking spaces, as this additional floor space is to accommodate existing uses undertaken at the site, but in a more modern, purpose-built environment suitable for the applicant’s needs.
- 6.24 It is considered that this site matches the criteria for Zone 2 (Edge of Town Centre) within Appendix B of the Supplementary Planning Guidance (SPG) document adopted by West Sussex County Council, which is *“attractive, safe and convenient accessibility by various modes but limited variety of direction; local shortfalls in the quality of alternatives and limited access to the wider catchment area; opportunities for improvements in the foreseeable future”*.
- 6.25 The SPG also states that maximum standards can be relaxed in areas that are considered accessible. Zone 2 is suitable for some relaxation of the parking standards based on the availability of other modes of travel.
- 6.26 The site currently provides a total of 11 parking spaces, and this is not proposed to be increased. In addition, the amount of staff at this site will not be materially increased by the development proposals (just 4 additional staff over that existing will be employed as a result of the development proposals), and therefore the

demand for parking will not be notably increased from that existing. Indeed, the existing parking provision functions suitably in terms of meeting demand, and this is considered to be due to the ample availability of unrestricted on-street parking on adjacent roads, and the good accessibility of the site, with public transport opportunities available nearby. In this context it is considered that the level of parking provided is appropriate for the proposed expansion.

- 6.27 At the time of the 2021 application being considered, the Council reiterated this view stating that *“the local Highway Authority is satisfied that the additional traffic generated by the proposals will not have any capacity issues for the local highway network and that the additional demand for parking will not result in a highway safety issue. In the absence of any objection from the local Highway Authority it is not considered refusal could be justified based on the lack of additional parking provision. An informative is recommend asking that the Applicant requests staff and visitors to the building to be considerate when parking on surrounding residential roads.*

The site is accessible by a range of public transport options, including Durrington rail station (north) and buses stopping along Goring Road (south. The proposals include provision of covered, cycle parking for 10 bikes”.

- 6.28 There will also be no changes to the existing access arrangements, which currently work well.
- 6.29 The proposals include the provision of a new, secure cycle store (with capacity for 10 bicycles), which will be available to be used by staff and visitors. We understand that this will be secured via an appropriately worded planning condition.
- 6.30 It is our view that the proposed parking and access arrangements are entirely acceptable to accommodate the increase in office floorspace hereby proposed. When the accessible location of the site is taken into account, it is evident that the site

currently provides ample parking provision for residents, staff and visitors alike in accordance with guidance contained within the NPPF, **Policies DM9** (delivering infrastructure) and **DM15** (sustainable transport and active travel) of the Worthing Local Plan and the WSCC guidance on Parking at New Developments, and this will continue following the implementation of the office use of the site proposed by this application.

e. Energy/Sustainable Design

- 6.31 An energy and sustainability report has been prepared to support this planning application, by ERS Consultants Limited. Their report outlines the key measures to be incorporated in the design, in regards to sustainability, carbon emissions, renewable energy and environmental impact of the considered development in accordance with national and local policy. Attention has been given to the Worthing Borough Council Local Plan 2020-2036 **Policies DM16, DM17 and SP2. Policy DM17** on energy states that all new housing and major non-residential development should include renewable and low-carbon energy systems to meet at least 10% of predicted total energy demand, after carbon reductions from energy efficiency measures. However, a major development is defined as development creating 1,000 sqm or more of floorspace, or development on a site of 1 hectare or more, which does not apply to the current proposal.
- 6.32 The report concludes that *“the proposal has achieved a significant reduction in CO2 emissions from the Part L 2021 baseline, which demonstrates the client and the design team’s commitment to sustainability in the built environment. This reduction in consumption and CO2 emissions has been achieved by following the energy hierarchy...The energy consumption and CO2 emissions savings made by implementing these measures across the site is summarised in Table 9.2:-“.*



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Table 9.2: Summary of energy consumption and CO ₂ emissions – Site-Wide				
	Energy Consumption [kWh/year]	Energy Consumption Savings [%]	CO ₂ Emissions [Tonnes CO ₂ /Year]	CO ₂ Emissions Savings [%]
Baseline	14,070		1.30	
Be Lean	13,744	2.32	1.26	3.24
Be Clean	13,744	0.00	1.26	0.00
Be Green	9,389	30.95	0.88	28.94
Total Reduction		33.27		32.18

6.33 Our client is committed to carrying out the above measure and *“to ensure that the figures in this document are maintained post-occupancy, suitable measures will be taken to record and report operational energy use by the use of smart metering”*.

e. Biodiversity

6.34 This planning application is accompanied by a Preliminary Ecological Appraisal and Biodiversity Impact Calculation, both of which have been prepared by The Ecology Co-op.

6.35 The report confirms that *“the site is dominated by closely-mown modified grassland, buildings and developed land; sealed surface with some scattered trees. The proposals will result in the loss of a small area of modified grassland”*.

6.36 It goes on to set out precautionary mitigation regarding breeding birds; noting that *“the trees within the site have the potential to support a variety of common nesting birds. It will be essential for any development to consider the nesting bird season and any vegetation removal should be timed outside of the nesting bird season (typically 1st March to 31st August), unless features are first searched by a suitably qualified ecologist and no active nests are found. If an active nest is identified, a*

minimum exclusion zone for all works within a 5m radius of the nest must be established to protect it from disturbance until the young have fledged”.

- 6.37 It goes on to conclude that *“as the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered. The proposed development is likely to require an ‘ecologically sensitive lighting scheme’ in accordance with guidance produced by the Bat Conservation Trust (summarised in Appendix 3).*

The enhancement opportunities identified in section 5 of this document will result in new opportunities for nesting birds and roosting bats, and likely beneficial effects for biodiversity at the site should they all be implemented in full.

It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application”.

- 6.38 The report confirms that the proposed development represents opportunities for habitat enhancement to benefit insects, birds and bats. It states that *“any planting scheme must include native shrub species and flowering species known to encourage insect diversity. Such enhancement measures are in line with the recommendations of the NPPF and as such would be considered favourably when determining the planning application...Bird boxes and bat boxes should be implemented within the scheme to provide additional nesting and roosting opportunities. As best practice, any lighting scheme should be designed to minimise light spill (see Bat Conservation Trust website), around these roosting features and potential commuting routes”.*
- 6.39 Our client is committed to carrying out the suggested mitigation measures and would be happy for these to be ensured via a suitably worded condition.

6.40 With regard to the Biodiversity Impact Calculation, the report confirms that *“the Statutory Biodiversity Metric calculation has demonstrated that the proposed scheme will results in a likely net gain of 0.04 habitat units (+10.28%).”*. It goes on to confirm that *“the current scheme does meet the 10% mandatory net gain value set out within the Environment Act 2021”*.

g. Trees

- 6.41 The Applicants have commissioned Arbortrack Systems to prepare an Arboricultural Impact Assessment & Method Statement (‘tree report’) to support this planning submission.
- 6.42 This tree report confirms that the proposals only require the removal of two low quality trees. They state that *“the proposals only require the removal of two low quality trees: 2 & 6, a wild cherry (Prunus avium) and a goat willow (Salix caprea), respectively. The overhanging crowns of small trees 4 & 5, a wild cherry and an elder (Sambucus nigra), will be cut back to the boundary to facilitate development (if necessary). Offsite tree 7, an ash (Fraxinus excelsior), will be cut back to deliver adequate separation off the proposed building: a minimum 0.5m separation is recommended”*.
- 6.43 The report confirms that *“the impact from the proposed office building makes a small and acceptable encroachment (c.4%) into the root protection areas (RPA) of tree 7 and no mitigation is necessary. The prognosis for this offsite tree is poor, given that it is showing early symptoms of ash dieback disease (Hymenoscyphus fraxineus)...One replacement tree is proposed near to the new pedestrian entrance (see Appendix A for location). There is also good scope for new planting in the vicinity of the proposals...The great majority of site works will take place beyond the RPAs of retained trees and canopies. Retained trees will be protected throughout the course of development by ground protection and fencing to the specification recommended by BS5837:2012”*.

- 6.44 The proposal would be acceptable from an arboricultural perspective and would be compliant with national and local level guidance.

g. Drainage

- 6.45 The application is accompanied by a SuDS & Foul Drainage Statement, which has been prepared by gta Civils and Transport.

- 6.46 The report sets out the following regarding the proposed sustainable surface water drainage design: -

“A drainage strategy layout has been prepared – refer to Appendix D. This shows all pipe diameters, manhole sizes, cover levels and invert levels.

The surface water from the extension’s roof will be routed into a newly formed trench soakaway. This soakaway has been sized to store the critical 1 in 100-year event + 45% climate change event.

The Flow Calculation sheets in Appendix E show that 16.7m³ is needed while the soakaway’s actual design volume is 18.0m³. Flow uses FEH22 hydrology and Cv values are set to 1.0. No surface flooding is showing.

Maintenance: The Applicant (clinic) shall be responsible for the ongoing maintenance of the drainage components, i.e. pipes, manholes and trench soakaway. A management company shall be appointed to undertake the necessary maintenance work. A SuDS Management and Maintenance Plan is shown in Appendix F. This sets out how the various components will be inspected and maintained – in line with Industry Standards as per CIRIA’s SuDS Manual C753.

Water quality / Treatment: The proposed SuDS strategy includes appropriate runoff treatment measures in the form of permeable paving to protect and improve the quality of the aquifer. This can be demonstrated using the Simple Index Approach described in CIRIA C753 (the SuDS Manual). The roofs are classified as ‘very low’ pollution hazard level. This is mitigated by the proposed soakaway.

Exceedance flows: in the event of system failure or for events in excess of the design event, it is expected that exceedance flows will be westwards to a local low point. It is proposed to discharge the development's foul water into the existing public foul sewer via the existing outfall manhole approximately halfway up the west boundary. The foul drainage strategy is shown in the layout drawing in Appendix D. Permission to discharge into the sewer – by means of an application under Section 106 of the Water Industry Act 1991 – will be sought from Southern Water in due course”.

- 6.47 They conclude that *“with the proposed measures in place, it is concluded that this development complies with the current local and national drainage policies”.*

7. CONCLUSIONS

- 7.1 There is a need for new and improved office facilities on site, which will consolidate all administrative and managerial functions into a single, purpose-designed space, freeing up rooms within the main building for their intended residential use.
- 7.2 The proposal follows a previously approved (and unimplemented) permission for *'proposed 2-storey extension to south elevation of existing care home to provide 19 bedrooms, and detached single storey staff/office block to the north west side of the site. Provision of new secure cycle store for 10 bikes (resubmission of AWDM/0702/20)'*, which was permitted in June 2021 (ref: **AWDM/0775/21**). This previous proposal sought permission for two extensions to the building; one of which was a significantly larger extension to the south. In comparison, the development proposal seeks permission for a modest sized two storey extension to the south of the building, which would sympathetically relate to the main building in terms of scale, form, siting, design and use of materials.
- 7.3 The development proposal would be significantly reduced in scale, when compared with the previously approved proposal. As per the previous proposal, *"the proposed 2-storey extension and detached single-storey building, would not be sited any further westward, closer to Clive Avenue, than the existing westernmost 'arm' of the building"*. Further, the extension would be constructed in materials to match the main building, allowing a level of visual subservience to be achieved. The proposed extension would be set away from all site boundaries and set well back from the site frontage and Clive Avenue.
- 7.4 In all respects the proposals will match the detailing, proportions, pattern and rhythm exhibited by the host building. The additions will therefore blend with the existing building appearing entirely cohesive and respectful in architectural terms. The proposals will not over dominate or be out of scale with the existing care home,

and instead provides a sensitive design solution that seeks to make an efficient use of the site, without detrimentally impacting on the important visual characteristics of the site and its immediate environs.

- 7.5 The proposal would not cause demonstrable harm to the residential amenities of any neighbouring building by way of noise or disturbance. The proposal would be fully compliant with **Policy DM5** of the Worthing Local Plan.
- 7.6 There will also be no changes to the existing access arrangements or level of parking provision. The proposals include the provision of a new, secure cycle store (with capacity for 10 bicycles), which will be available to be used by staff and visitors.
- 7.7 The Applicant has commissioned detailed supporting reports on arboricultural, energy/sustainability matters, Ecology and Drainage. These reports confirm the proposed developments policy compliance in respect of these specific issues.
- 7.8 In summary, we submit that the development proposals represent a wholly acceptable form of development; which would be of a high-quality design, respecting the scale, form and design of the existing building. The resultant building will be of an improved visual quality, which will reinforce local distinctiveness and respect local character; whilst making an efficient use of a currently under-used site within a sustainable location. The new office use would provide much needed additional facilities to serve the car home facility, whilst respecting the established spatial pattern and character of buildings in this locality.
- 7.9 The proposal comprises sustainable development, and benefits from the presumption in favour of sustainable development as set out in paragraph 11 of the revised NPPF.

- 7.10 As the proposal meets all the necessary policy requirements and will cause no harm to the character of the surrounding area, or the amenities of future or existing occupants, then it is our opinion that the overwhelming weight of evidence supports the proposal as it is shown to comply with all relevant Development Plan policies.
- 7.11 As the proposal accords with the aims and objectives of national, regional and local guidance, the application site is a suitable for the proposed development and permission should therefore be granted.

July 2026