

The Pines, Worthing

Planning, Design & Access Statement (comprising Educational Need Statement)

36675

September 2026



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1 INTRODUCTION

1.1 REPORT PURPOSE

1.1.1 This Planning, Design and Access Statement has been prepared by DHA Planning on behalf of West Sussex County Council ('the Applicant') in support of a full planning application for an extension to a building and reconfiguration of the external areas at The 'Pines' ('the Site'), required to facilitate its operation as a satellite Special Educational Needs and Disabilities (SEND) school associated with Oak Grove College in Worthing.

1.1.2 The description of development is as follows:

"External alterations and extension of an existing building, together with the reconfiguration of the car park and access routes, and revised/additional hard and soft landscaping, boundary treatments, and ancillary buildings/structures/plant, with other associated works; to facilitate its refurbishment and repurposing for use as a satellite special education needs (SEND) school."

1.1.3 This Statement provides an overview of the Application Site, the context surrounding the need for the satellite site and the required application proposals to facilitate its operation. It assesses the planning merits of the scheme with regard to the planning policy framework and material considerations, including comment on educational need. The Statement subsequently concludes that the proposal is acceptable in planning terms and therefore planning permission should be granted.

1.2 BACKGROUND (NEED STATEMENT)

1.2.1 Oak Grove College is a SEND school that caters for children with learning difficulties from Year 7 to Year 14. The school has a capacity of 276 students, with 274 students currently enrolled (Ofsted 2026). Students are taught in groups tailored toward their specific individual needs.

1.2.2 As a result of a continued, high-level need for additional capacity, the school is looking to expand its facilities to increase the number of students. This is intended to reduce the number of SEND students needing to travel further afield for other SEND-school services.

1.2.3 Their main campus, located off Littlehampton Road (A2032), is highly constrained by existing surrounding development and offers little opportunity for further expansion, without encroaching on existing playing fields and sports provision. This includes the neighbouring Durrington High School, which is found on the same site as Oak Grove College. The only viable option has been to identify additional accommodation within the local area.

1.2.4 The proposed secondary Site is the 'Pines' building, a former adult education centre, found just 0.6 miles from Oak Grove College. The Site is owned by West Sussex County Council.

- 1.2.5 See **Figure 1.1** for the location of the Oak Grove College main campus as well as the proposed secondary campus at the Pines.



FIGURE 1.1 PINES AND OAK GROVE COLLEGE LOCATION

1.3 STATEMENT STRUCTURE

- 1.3.1 The structure of this Planning Statement is as follows:

- Section 2 sets out the context of the Site, the immediate surroundings and the relevant planning history;
- Section 3 has regard to the development proposed;
- Section 4 reviews the planning policy context by which the planning application will be considered, including having regard to the advice contained in the National Planning Policy Framework (NPPF) (August 2026) and the formal policies of the development plan;
- Section 5 considers the ‘principle’ of the development, educational need and any other relevant planning considerations; and
- Section 6 draws conclusions to justify why it is considered that the development is acceptable.

1.4 APPLICATION DOCUMENTS

- 1.4.1 This application is accompanied by a suite of documents which are listed in **Tables 1 and 2** below. This list accords with the West Sussex County Council’s Local List (November 2025).

PLAN/ DRAWING	AUTHOR
Arboricultural Impact Assessment	AtkinsRéalis

Existing Tree Schedule	Lizard
Biodiversity Net Gain Assessment and Metric	AtkinsRéalis
Bat Survey Report	AtkinsRéalis
Flood Risk Assessment	Wills Design Partnership
Outline Landscape Specification: Hard Landscape – Paving, Kerb and Edging System (Rev. 2)	AtkinsRéalis
Preliminary Ecological Appraisal	Lizard
Surface Water Drainage Statement	AtkinsRéalis
Staff Travel Plan	AtkinsRéalis
Transport Statement	AtkinsRéalis

TABLE 1: ACCOMPANYING DOCUMENTS

PLAN/ DRAWING	REFERENCE	AUTHOR
Site Location Plan	PINES-ATR-ZZ-XX-D-A-021000 Rev. P04	AtkinsRéalis
Existing Site Plan	PINES-ATR-ZZ-XX-D-A-021001 Rev. P03	
Proposed Site Plan	PINES-ATR-ZZ-XX-D-A-021002 Rev. P04	
Existing Ground Floor Plan	PINES-ATR-XX-00-D-A-11010 Rev. P02	
Existing First Floor Plan	PINES-ATR-XX-01-D-A-11011 Rev. P02	
Existing Roof Plan	PINES-ATR-01-RF-D-A-11014 Rev. P02	
Existing North and South Elevation	PINES-ATR-XX-XX-DR-A-11012 Rev. P02	
Existing East and West Elevation	PINES-ATR-XX-XX-DR-A-11013 Rev. P02	
Proposed Ground Floor Plan	PINES-ATR-01-00-D-A-011010 Rev. P05	
Proposed First Floor Plan	PINES-ATR-01-01-D-A-011011 Rev. P05	
Proposed Roof Plan	PINES-ATR-01-RF-D-A-011012 Rev. P05	
Proposed North and South Elevations	PINES-ATR-01-ZZ-D-A-012011 Rev. P05	
Proposed East and West Elevations	PINES-ATR-01-ZZ-D-A-012012	
External Arrangement Plan	PINES-ATR-XX-XX-D-L-401001 Rev. P01	
Fencing Arrangement and Access Control Strategy	PINES-ATR-XX-XX-D-L-461001 Rev. P03	
Circulation Strategy	PINES-ATR-XX-XX-D-L-461002 Rev. P03	

Tree Constraints Plan	LLD3720-ARB-DWG-001 Rev. 01	Lizard
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TABLE 2: ACCOMPANYING PLANS/ DRAWINGS

2 SITE AND SURROUNDINGS

2.1 SITE LOCATION AND DESCRIPTION

- 2.1.1 The Pines building is a former training centre for adults with learning disabilities, which was deemed surplus to requirements in late 2022. The Site is made up of a main two-storey building, constructed in 1991, and other small ancillary structures. To the rear of the building existing hard and soft landscaping is found, previously used as external amenity space for the training centre.
- 2.1.2 The Site is located north of Romany Road and Faraday Close, found just 0.6 miles from Oak Grove College. The northwestern and northeastern boundary are adjacent to an informal footpath, running between the Site and the parking area of an industrial building found north. The former Columbia House development Site lies beyond the path to the northeast. The southeastern boundary is adjacent to Romany Road, and the southwestern and western boundary to Faraday Close.
- 2.1.3 Faraday Close provides vehicular and pedestrian access into the Site. The access routes lead directly into a parking area, providing approximately 15 general parking bays and 4 accessible bays.
- 2.1.4 Following the relocation of the adult training centre in 2022, the Site has been vacant and relatively unkept. This has resulted in the main building being vandalised and suffering degradation.

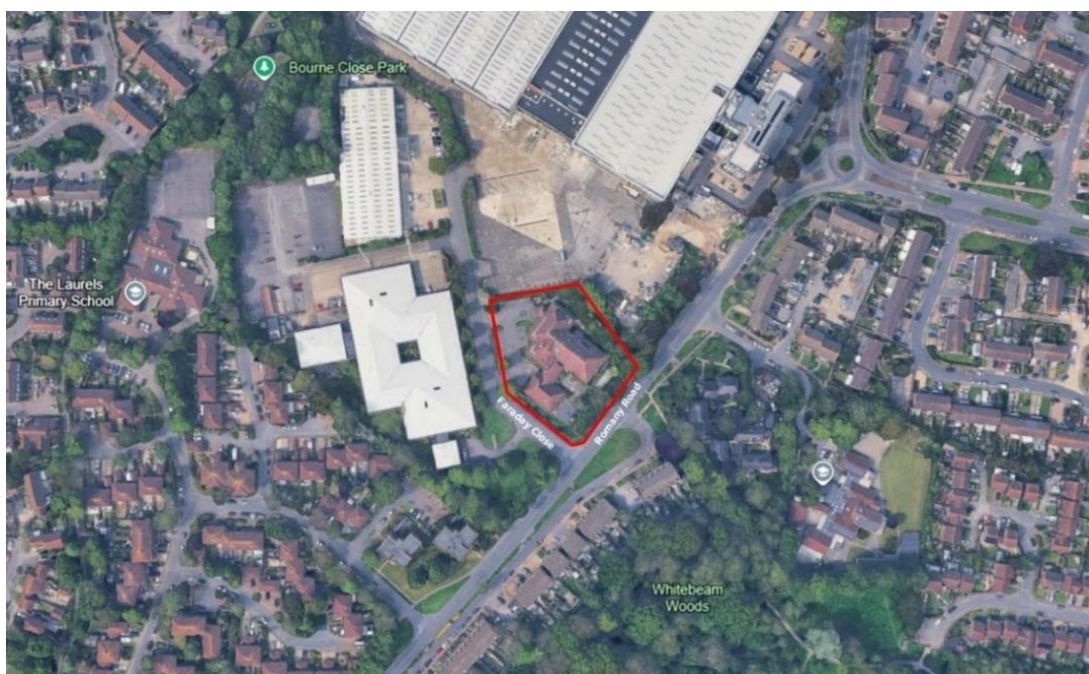


FIGURE 2.1 – SITE AERIAL (BASE MAP SOURCE: GOOGLE EARTH)

2.2 SURROUNDING CONTEXT AND ACCESSIBILITY

- 2.2.1 The immediate area to the north and west is comprised of predominantly industrial or commercial buildings, and their associated parking areas. However to the north is a residential development Site for which planning permission has been granted for the erection of residential flats alongside the conversion of the former Columbia House. It is understood that Columbia House is now occupied, however the adjoining land remains undeveloped. A more recent planning application has been submitted for 78no. dwellings on the Site, but it remains undetermined.
- 2.2.2 Toward the south along Romany Road, residential units are found around Whitebeam Woods and Longcroft Park. This reflects the wider context of the Site which, other than the nearby industrial buildings and The Laurels Primary School further north, is predominantly residential.
- 2.2.3 Faraday Close, Romany Road and the surrounding streets benefit from footways, meaning there is opportunity for accessing the Site via foot.
- 2.2.4 The Site is accessible via public transport, with Faraday Close bus stop and Winterbourne Way bus stop being located approximately 35m and 250m to the south along Faraday Close respectively. The bus stops provide regular services to Worthing Town Centre and Durrington. Montreal Way bus stop is also located within 200m to the north of the Site, providing additional services to Salvington in the north.
- 2.2.5 Several railway stations are found in Worthing, with Goring-By-Sea railway station being located a 9-minute cycle from the Site, Durrington-on-Sea railway station (an 8-minute cycle from the Site) and West Worthing railway station (a 14-minute cycle from the Site). These provide regular services to Littlehampton, London Victoria, Brighton, Portsmouth and Southsea, and Chichester.
- 2.2.6 The Department for Transport's Connectivity Tool (2025) assesses accessibility based on proximity to services and public transport, scoring walking, cycling, public transport and driving accessibility. The DfT Connectivity Tool ranks the accessibility with the following intervals:
- 10-20% (Very Low) and 20-30% (Low);
 - 30-40% (Below Average) and 40-50% (Slightly Below Average);
 - 50-60% (Slightly Above Average) and 60-70% (Above Average);
 - 70-80% (High) and 80-90% (Very High); and
 - 90-100% (Highest).
- 2.2.7 The Site is scored a 68% by the DfT Connectivity Tool, as shown in **Figure 2.2**, meaning it is above average for connectivity and accessibility.

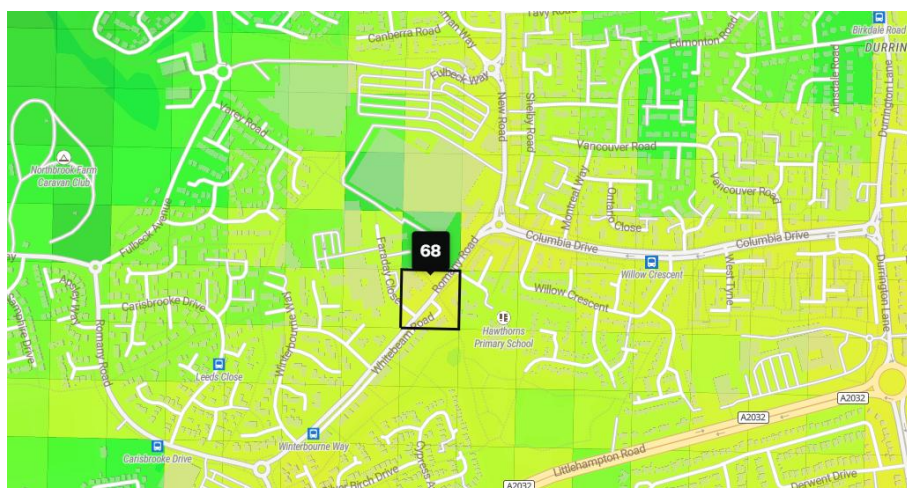


FIGURE 2.2: DFT CONNECTIVITY SCORE EXCERPT

2.3 SITE SPECIFIC PLANNING CONSIDERATIONS

Spatial, Landscape and Environmental Designations

- 2.3.1 The Site falls within the built-up area of Worthing. It does not fall within any other spatial or landscape designations such as the Green Belt, National Park or National Landscape. It falls under the definition of previously developed land.
- 2.3.2 A review of MAGIC mapping has revealed no designated habitats or Ancient Woodland on or immediately adjacent to the Site.
- 2.3.3 The Worthing Planning Tree Preservation Order (TPO) Register indicates that no trees in proximity to the development area are subject to a TPO.

Flood Risk

- 2.3.4 The Environment Agency's Flood Map for planning shows the majority of the Site within Flood Zone 1, while the parking area found along the Faraday Close boundary is within Flood Zone 2/3. This is shown in **Figure 2.3**.
- 2.3.5 The Map also indicates that the Site is at risk of surface water flooding along the boundary with Faraday Close. Risk increases from the 1-in-30 to 1-in-100- and 1-in-1000- year scenarios, as shown in **Figure 2.4**.

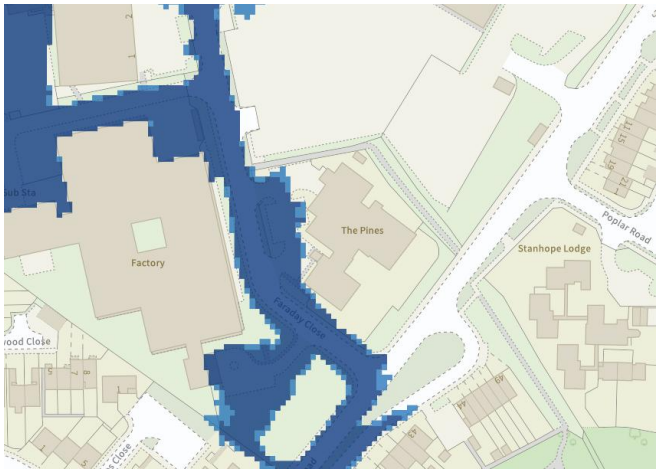


FIGURE 2.3 – FLUVIAL FLOOD RISK SHOWING FLOOD ZONE 2/3 (BASE MAP SOURCE: DEFRA)

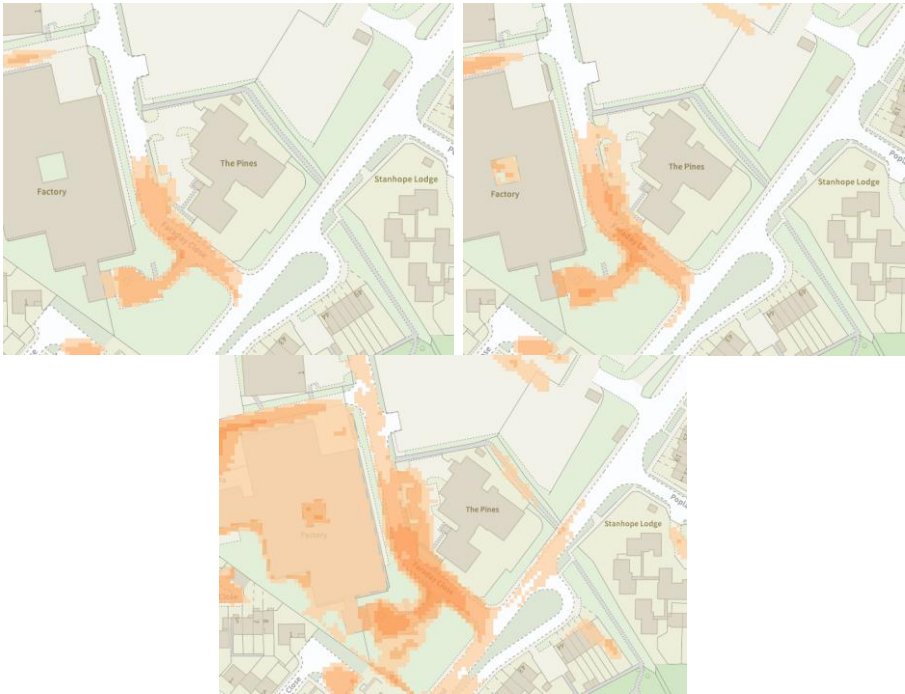


FIGURE 2.4 – SURFACE WATER FLOOD RISK IN THE 1-IN-30 TO 1-IN-100- AND 1-IN-1000- YEAR SCENARIOS (SOURCE: DEFRA)

Heritage

- 2.3.6 There are no designated heritage assets located within, adjacent to, or in close proximity to the Site.

2.4 PLANNING HISTORY

- 2.4.1 A review of the relevant planning history, sourced from WSCC’s planning archives in July 2025, has found the following applications of relevance to the Site:

REFERENCE	DESCRIPTION	DECISION
WB/28/87	Erection of an Adult Training Centre with access off Faraday Close (outline)	Approved 19/03/1987
WB/1314/87	Adult training centre	Approved: 18/04/1988

2.5 PHOTOGRAPHS



3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

- 3.1.1 The proposal involves alterations to and the extension of an existing adult training centre to create a new 60-place satellite facility for Oak Grove College, increasing the school's capacity for SEND students at the school. As both the existing and proposed functions fall within the same use class, planning permission is not required for the intended use.
- 3.1.2 The development will, however, result in the need for an extension and alterations to the building, and the reconfiguration of external areas. It is these elements for which planning permission is sought. The development aims to deliver a holistic and inclusive learning environment, incorporating provisions for multi-sensory impairments, physical and mental needs, as well as specialist behavioural support.
- 3.1.3 The application seeks planning permission for the following development:

"External alterations and extension of an existing building, together with the reconfiguration of the car park and access routes, and revised/additional hard and soft landscaping, boundary treatments, and ancillary buildings/structures/plant, with other associated works; to facilitate its refurbishment and repurposing for use as a satellite special education needs (SEND) school."

- 3.1.4 The following Section will discuss the proposed works at the Site. To note, internal refurbishments will also be carried out, however these fall outside the definition of development and therefore do not require formal planning permission.
- 3.1.5 The Site's operation as a SEND school, in place of its previous use as an adult training centre, does not itself constitute development requiring planning permission. As set out in Section 5.2, both uses fall within Use Class F1 of the Town and Country Planning (Use Classes) Order 1987 (as amended), and there is accordingly no material change of use for planning purposes. This application therefore relates solely to the extension and external works identified above, which are required to facilitate that operation.

3.2 PROPOSED WORKS

- 3.2.1 To facilitate the change in function of the building from an adult training centre to a SEND school facility, the main building and external areas of the Site require reconfiguration. These are discussed below.
- 3.2.2 Please refer to the submitted Plans for further detailing or clarification of the Proposed Development. The Landscape Outline Specification includes the proposed materials for the proposals, please refer to this for material and finish detailing.

Proposed Amendments to the Existing Building

- 3.2.3 An extension is proposed to the dining hall, at the southeast of the building. This is proposed as a storage area. The proposed materials for the extension will be the same as the main school building, comprising red facing brick, stretcher bond and blue engineering brick, soldier bond.
- 3.2.4 The roof of the extension will extend into the proposed new canopy. A further canopy will be installed over the server door into the dining room. The roof tiles for the canopies will be the same tiles as the rest of the roof.
- 3.2.5 The existing canopy at the front of the building which consists of a frame, will be refurbished to include new laminate safety glass over the frame.
- 3.2.6 Amendments to the roof are required. These are as follows:
- The roof structure will be replaced like-for-like. Where like-for-like tiles are not available, equivalent tiles will be used. These will be terracotta through fibre cement interlocking roof tiles.
 - The roof is proposed to include windcatchers on the northern and southern side of the building; new double glazed panels to the existing lantern structure; and the roof vents will be replaced to match the existing vents.
 - On the first floor, a door is proposed serving the staff room on the northern roof of the building to replace the existing windows serving the terrace. Further curtain wall will be included along the terrace.
- 3.2.7 On the northern elevation of the building, frosted curtain wall units with openable windows will be included to serve the hygiene room. These will comprise solid panels at lower levels to ensure privacy.

New Outdoor Amenity Areas

- 3.2.8 A new outdoor gym and playground area is proposed at the southernmost corner of the Site. This will facilitate active play and will include a sensory tunnel. Please refer to the Outline Landscape Specification document for specific detailing of the play equipment proposed in this area. To facilitate the outdoor gym and playground area the following works are required:
- The existing group of trees and area of vegetation located where the proposed play area is proposed will need to be removed.
 - New hedgerow planting and trees are proposed along the proposed outdoor gym and playground to screen views into the Site from Romany Road.
 - The existing fencing along Romany Road will be relocated to create a 0.4m offset between the fencing and the public footway adjacent to the Site along Romany Road.

- The existing dwarf brick wall located adjacent to the play area will be removed and replaced with a new retaining wall in order to retain the existing vegetation embankment.
- 3.2.9 A free-standing canopy is proposed to the rear of the Site, within the courtyard area. The courtyard will serve an outdoor dining area. To facilitate this, the overgrown grassed area is to be cut back. Raised planters are proposed within the dining area for sensory learning.
- 3.2.10 The existing polytunnel is to be removed at the rear of the Site. This will be replaced by a grassed informal amenity area.
- 3.2.11 The grass area to the rear of the Site will accommodate a social area for use as a forest school/ outdoor learning area.

Means of Enclosure and Circulation

- 3.2.12 Save for the amendments to means of enclosure already discussed, the following further amendments are proposed as part of the development:
- The existing knee rail is to be removed from the front of the Site.
 - Pedestrian access control gates and fencing will be installed to the south of the entrance point of the Site; this is to provide a secure pedestrian route. The existing pedestrian entrance footpath will be widened, regraded and resurfaced to provide a compliant footpath.
 - The existing trees along Faraday Close are to be removed, to increase security through preventing access to the site via climbing.
 - The existing brick wall along Faraday Close will be retained, with 400mm security fencing being installed above the brick wall, bringing the enclosure to 2.4m in height.
 - The existing dwarf brick wall to the north of the site, as well as the bench, is to be removed. This is to facilitate space for the proposed extension and canopy area.
 - The existing northern fence, shed to the north of the building and handrail surrounding the site are to be removed.
 - The 1.8m high fence surrounding the Site will be replaced with 2.4m high security fencing. This will follow the existing fence line.
 - All hard standing will be resurfaced and re-levelled.

Minor Operations

- 3.2.13 A new Air Source Heat Pump (ASHP) unit is proposed to the northern corner of the Site.
- 3.2.14 The existing refuse store to the front of the Site will be retained with new fencing and gates surrounding the area.

- 3.2.15 A condenser enclosure will be included adjacent to the north of the building.
- 3.2.16 The shed found to the southern corner of the site is to be removed and replaced.
- 3.2.17 Ramps will be reconfigured to ensure compliance with the Equality Act (EA) and Part M requirements.

Parking and Access

- 3.2.18 The existing car park/ drop-off area to the front of the Site will be retained, including the existing one-way system. Some reconfiguration will take place for parking and access arrangements, including:
 - Reconfiguration of the parking and drop-off area to provide 3no. minibus bays with a safety zone for drop-off/ pick-up operation;
 - Reconfiguration of the existing parking bays to provide new accessible bays and standard bays with an EV charging point;
 - The asphalt course is to be removed and resurfaced within the car park area, the sub-base will be retained.
 - New vehicle access gate and security fence to be installed at access points to the Site;
 - Replacement of existing lighting bollards; and,
 - Addition of standard and accessible cycle parking along the southeastern boundary.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act, applications for planning permission are required to be determined in accordance with the Development Plan in force unless material considerations indicate otherwise.
- 4.1.2 West Sussex County Council's adopted policies are related to minerals and waste, comprising the Joint Minerals Local Plan (2018, with a partial review in 2021 and 2023) and the West Sussex Waste Local Plan (2014). There are no adopted policies of relevance to general development management. Therefore, the relevant development plan for this Site will be the adopted Development Plan for Worthing, which comprises of the Worthing Local Plan (March 2023).
- 4.1.3 Material considerations include the National Planning Policy Framework (NPPF) (August 2026); the Ministry of Housing, Communities & Local Government's (former DCLG) Policy Statement titled 'Planning for Schools Development' (2011); the Town and Country Planning (General Permitted Development) (England) Order (2015); and relevant Supplementary Planning Documents (SPDs) including the Worthing Green Infrastructure and Biodiversity Supplementary Planning Document (2026) and the Worthing Planning and Climate Change Checklist (2023).

4.2 THE DEVELOPMENT PLAN

Worthing Local Plan (March 2023)

- 4.2.1 The Worthing Local Plan shows the Site within the recognised settlement of Worthing and within an area recognised as a Key Industrial Estate designated under Policy DM11 (Protecting and Enhancing Employment Sites), as shown in orange on the plan extract in **Figure 4.1** below.

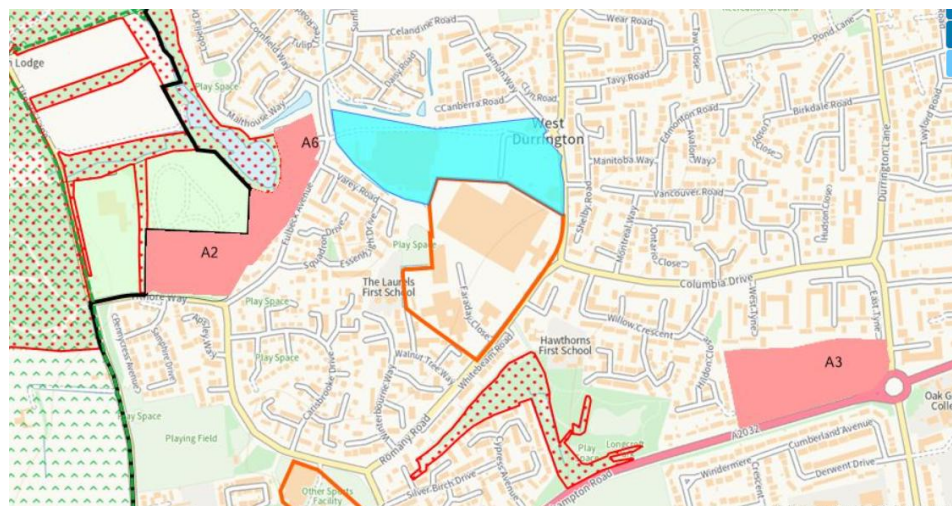


FIGURE 4.1 – EXTRACT OF THE WORTHING LOCAL PLAN POLICIES MAP (SOURCE: WBC)

4.2.2 The following policies from the Worthing Local Plan are considered to be of relevance to this Site:

- Policy SP1: Presumption in Favour of Sustainable Development
- Policy SP2: Climate Change
- Policy SP3: Healthy Communities
- Policy SS1: Spatial Strategy
- Policy DM5: Quality of the Built Environment;
- Policy DM7: Open Space, Recreation and Leisure
- Policy DM8: Planning for Sustainable Communities / Community Facilities;
- Policy DM9: Delivering Infrastructure;
- Policy DM11: Protecting and Enhancing Employment Sites;
- Policy DM15: Sustainable Transport & Active Travel;
- Policy DM18: Biodiversity;
- Policy DM19: Green Infrastructure;
- Policy DM20: Flood Risk and Sustainable Drainage;
- Policy DM21: Water Quality and Sustainable Water Use;
- Policy DM22: Pollution

4.3 MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework (NPPF, 2026)

- 4.3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It is a material consideration in planning decisions. The framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.3.2 **Paragraph 17** states achieving sustainable development means that the planning system has 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):

- (a) An economic objective – 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;
- (b) A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- (c) An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.3.3 **Chapter 14: Achieving well-designed places** sets out the policies with the objectives to promote high quality, healthy, inclusive and sustainable places, through setting clear expectations about design outcomes and the use of relevant tools and processes.

4.3.4 **Policy HC1: Planning for Healthy Communities** states that in planning for community facilities and public service infrastructure, authorities should engage proactively with local communities and relevant service providers, taking into account relevant strategies to improve health, address inequalities and foster social and cultural well-being for all sections of the community. Authorities should attach considerable importance to providing for sufficient education facilities (including early years, school and post-16 provision), all types of health care provision and other essential community facilities and public service infrastructure over the plan period, in a way that aligns with the needs of the local population and any wider requirements for improvements in public service infrastructure identified by the government or public agencies (recognising that some public service infrastructure serves a larger than local population).

4.3.5 **Chapter 15: Managing Flood Risk and Coastal Change** sets out the policies with the objectives to minimise risks to development arising from all sources of flooding and coastal change, taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere, and incorporating sustainable drainage systems where appropriate.

Supplementary Planning Documents: Worthing Green Infrastructure and Biodiversity Supplementary Planning Document (2026)

4.3.6 Worthing Borough Council adopted the Worthing Green Infrastructure and Biodiversity Supplementary Planning Document (SPD) on 17th June 2026. It forms a suite of planning guidance documents including the Worthing Green Infrastructure and Biodiversity SPD, the Adur & Worthing Biodiversity Net Gain Technical Advice Note (TAN) and the Adur & Worthing Urban Greening TAN.

- 4.3.7 It is accompanied by a green infrastructure map, which shows strips referred to as the 'Active Travel Network' (purple) and a Rivers, Streams and Aquifers Priority Area crossing part of the Site. These do not reflect any particular features on Site and appear to follow nearby road / drainage networks.

Supplementary Planning Documents: Worthing Planning and Climate Change Checklist (2023)

- 4.3.8 The Worthing Planning and Climate Change Checklist was adopted in 2023 alongside the current Worthing Local Plan. The Checklist sets out the specific requirements set out in the Local Plan's policies regarding Climate Change, ensuring developments are compliant with these policies.

Policy Statement Planning for Schools Development (Ministry of Housing, Communities and Local Government; 2011)

- 4.3.9 The Government has pledged its support for the development of schools by producing the Planning for Schools Development Policy Statement in August 2011. The Policy Statement sets out that the creation and development of state-funded schools is strongly in the national interest and that planning decision makers can and should support that objective, in a manner consistent with their statutory obligations.
- 4.3.10 It emphasises the importance of increasing school capacity to meet growing demand, enhancing educational standards, and promoting diversity in school provision.
- 4.3.11 The Statement outlines the Government's belief that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools.
- 4.3.12 It introduces a presumption in favour of school development and urges authorities to fully consider the importance of enabling such projects. Authorities are instructed to use their planning powers constructively, streamline application processes, and avoid unnecessary conditions. Any refusal or imposition of conditions must be backed by strong evidence, or it may be deemed unreasonable.

5 PLANNING ASSESSMENT

5.1 INTRODUCTION

5.1.1 In determining whether the proposal accords with the development plan, the following key issues are considered:

- Principle of Development
- Design and Layout
- Highways and Access
- Ecology, Trees and Biodiversity Net Gain (BNG)
- Flood Risk and Drainage
- Other Environmental Matters

5.1.2 These considerations are discussed in turn below.

5.2 PRINCIPLE OF DEVELOPMENT

5.2.1 Although the Site's continued use for education does not itself require planning permission (see Section 3), the following sections assess the planning merits of the works required to facilitate that use, together with the other material considerations relevant to the application.

5.2.2 The Site falls within the defined built-up area of Worthing in which, under **Policy SS1: Spatial Strategy**, the principle of new development is supported subject to other relevant planning considerations.

5.2.3 The Government has expressly confirmed through the Planning for Schools Development Policy Statement in August 2011 that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools.

5.2.4 The Statement requires local authorities to **apply a presumption in favour of state-funded schools**, as expressed in the National Planning Policy Framework, and that the following principles should apply:

- (1) There should be a presumption in favour of sustainable development of state-funded schools.
- (2) Local Authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools.

5.2.5 In order to facilitate the efficient and positive delivery of school development, the Policy Statement requires Local Authorities to make full use of their planning

powers to support applications for state-funded schools and clearly justify a refusal of any application.

- 5.2.6 Local Planning Authorities should take a proactive and collaborative approach to meeting this requirement, giving great weight to the need to create, expand or alter schools and work with applicants to resolve any planning issues before applications are submitted.
- 5.2.7 Further, **Policy SP3 (Healthy Communities)** part (a)(iv) highlights the importance of improving provision and access to education in order to provide maximum opportunities to promote healthy lifestyles.
- 5.2.8 **Policy DM8 (Planning for Sustainable Communities/ Community Facilities)** states that the Council will support improvements to education facilities to ensure they meet the needs of local communities. This is provided that there would not be any unacceptable impacts on the occupiers of adjacent properties. The development is unlikely to cause unacceptable impacts on adjacent properties given the minor nature of the works and the long-term existing use of the building.
- 5.2.9 The Government's commitment to ensuring the planning system supports the development of schools affirms that the principle of development for the proposed development of the Pines should be accepted. This is aligned with the adopted policies of the Local Plan.

Educational Need

- 5.2.10 The West Sussex SEND Strategy 2026-2030 and the Growing Special Education Needs provision in West Sussex Report by Interim Director for Children, Young People and Learning sets out that West Sussex has an increased demand for specialist educational provision when compared to national averages. West Sussex has experienced a rise in the number of requests for EHC needs assessments since 2019, which is over double the rise seen nationally.
- 5.2.11 Furthermore, the Growing Special Education Needs Report states that all the maintained Special Schools in West Sussex are at maximum capacity. Students are increasingly required to travel outside their local area to access appropriate education provisions. Expanding the capacity of Oak Grove College would increase the SEND capacity, which would significantly reduce the need for SEND students to travel. This would enhance the accessibility for local students and alleviate the logistical challenges posed for SEND students in travelling further afield for schooling.
- 5.2.12 Overall, there is clearly a significant need for SEND provisions across West Sussex. The addition of a satellite site at Oak Grove College will increase the number of SEND students who can be enrolled at the school, helping to meet the increasing demand for SEND support across West Sussex. This is encouraged by the NPPF's commitment to ensuring a sufficient choice of school places are available to meet the needs of the community.
- 5.2.13 The above highlights that there is a clear, unmet need for SEND provision in Worthing. Whilst planning permission is not required for the use of the building as a school, the proposed extension and external works will facilitate this function. In

line with the Ministerial Statement, this need should be given great weight when considering the proposed physical alterations to the Site.

Alignment with Spatial Strategy

- 5.2.14 The Site falls within the defined built-up area of Worthing in which, under **Policy SS1: Spatial Strategy**, the principle of new development is supported subject to other relevant planning considerations.
- 5.2.15 The Site is, however, allocated by the Worthing Local Plan as a Key Employment Area. Under **Policy DM11: Protecting and Enhancing Employment Sites**, these areas are viewed as essential for maintaining the supply of diverse business uses, with alternative uses only being acceptable in exceptional circumstances. The exceptional circumstances have must regard to the following factors:
- (i) Robust evidence setting out the importance of the use to the future of the local economy;*
 - (ii) A demonstration that the introduction of the proposal use would not negatively impact on the functioning of the key employment area or the local economy as a whole;*
 - (iii) Evidence that the loss of the existing use would not negatively impact the local economy and;*
 - (iv) Evidence of alternative sites outside of the key employment areas have been considered and that no suitable sites are available.*
- 5.2.16 The Pines' long-term use as an adult training centre, means there would be no change of use to the building (use Class F1 in both cases), rather a change of function. Accordingly, no separate planning permission is required for this element of the proposal, and there is no direct loss of a business use through change of use.
- 5.2.17 Notwithstanding this, the works applied for will facilitate the Site's continued operation for education rather than business purposes. The following paragraphs therefore address this against the exceptional circumstances set out under Policy DM11, having regard to the policy's underlying objective of protecting the supply of employment land. As previously discussed, it can be demonstrated that the continued use of the building is essential for education provision in Worthing, given the current lack of SEND provision in the area.
- 5.2.18 Given the Site has been out of operation for several years, the development would significantly increase the employment in the area by reintroducing an active use. The school will generate a significant amount of employment as many of the 60 pupils enrolled will require one-to-one care, in addition to the teaching staff and maintenance staff required; this will generate a need for approximately 50 new staff members. Alternative sites would not be appropriate for the proposed use, as its proximity to Oak Grove College is essential to act as Oak Grove College's satellite provision.
- 5.2.19 In terms of part (iv) of the Policy, the location of the potential satellite site is constrained, given that the provision needs to be located nearby Oak Grove College. The Pines is not only under the same ownership as Oak Grove College, but is also currently vacant and lies just 0.6 miles from the main campus.

Permitted Development Rights

- 5.2.20 Several of the proposed alterations within the Site will benefit from the permitted development rights available within the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. This will be a material planning consideration in the determination of the application.
- 5.2.21 A detailed review of the relevant permitted development rights has been undertaken, with **Table 3** identifying which proposed works would or would not fall within the relevant permitted development right.

PROPOSED WORKS	RELEVANT PERMITTED DEVELOPMENT RIGHT	DOES THE PROPOSED DEVELOPMENT BENEFIT FROM PERMITTED DEVELOPMENT?
Amendments to the fencing within and surrounding the Site.	Part 2, Class A - the erection, construction, maintenance, improvement or alteration of a gate, fence wall, or other means of enclosure.	No
Proposed electric vehicle charging point	Part 2, Class E - relating to electrical upstands for recharging vehicles.	Yes
Proposed dining hall extension and external ancillary building.	Part 7, Class M - the erection, extension or alteration of a school or college (inter alia).	Yes
Replacement of any existing hardstanding	Part 7, Class N - hard surfaces for schools or colleges (inter alia).	No
Demolition of existing means of enclosure	Part 11, Class C - demolition of the whole or any part of any gate, fence, wall, or other means of enclosure.	Yes
Outdoor play equipment, free-standing canopy, Air Source Heat Pump and planters.	Part 12, Class A - works by a local authority.	Yes

TABLE 3: RELEVANT PERMITTED DEVELOPMENT RIGHTS

- 5.2.22 Given that all of the proposed works, with the exception of the alterations to the hardstanding, modifications to the existing fencing and replacement of the roof, constitute permitted development, the principle of the majority of the development has already been established as acceptable through the provisions outlined by the GPDO.
- 5.2.23 During pre-application discussions with WSCC, it was advised that it would be preferable for a single planning application to be submitted encompassing all works proposed to avoid the need for multiple applications and to provide greater clarity for local residents, consultees, councillors and officers as to the nature and extent of the proposed development, thereby enabling a comprehensive and holistic assessment of the scheme as a whole.

5.2.24 To conclude, the principle of the development on the Site is acceptable and should be supported by the local planning authority given that:

- The Government expressly confirmed that that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools.
- There is a significant need for SEND provisions in Worthing;
- Although the proposed development is a departure from its allocation for employment space, the Site has been in long term educational use and has the proposal would not result in any impact on commercial floorspace. It has been shown that the proposed development would significantly increase the employment levels of the Site currently; and,
- The principle of development of much of the works is acceptable, due to the permitted development rights available under the GDPO.

5.3 DESIGN AND LAYOUT

5.3.1 **Policy DM5: Quality of the Built Environment** of the Local Plan sets out the requirements for good design in new developments. The requirements of Policy DM5 are set out in the table below, as are the means in which the proposed development complies with this Policy.

POLICY REQUIREMENT	COMPLIANCE
<i>All new development (including extensions, residential annexes, alterations, ancillary development, change of use and intensification) should:</i>	
i) <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;</i>	The majority of the works will be located to the rear of the Site and will not be visible from public areas. This includes the proposed extension. The condition of the Site is currently poor due to the long term vacancy of the building. The proposals will result in a considerable improvement to the appearance of the Site through the external alterations proposed and the creation of a more attractive external environment. This includes the replacement of the roof with a like-for-like roof. The existing roof is in a poor state of repair and therefore requires the reconstruction. The proposed extension to the dining hall is a minor extension to the building, meaning it will be entirely proportionate and will have limited impact to its overall character.
ii) <i>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;</i>	The proposed appearance and character, including materials and architectural form for the proposed extension will be in-keeping with the existing materials on the Site. Notably, the replacement of the roof will be as per the existing roof, using the same roof tiles. Where the existing roof tiles are difficult to source, equivalent roof tiles will be used.

	Further, as discussed above, the scale of the extension is minor, meaning the extension will be in proportion to the main building.
	Landscaping, through the amendment of fencing, addition of hedgerows and amendments to the hardstanding will improve the existing appearance of the Site.
iii) <i>make a positive contribution to the sense of place, local character and distinctiveness of an area;</i>	The Site has fallen into disuse, meaning the refurbishment of the building will enhance the sense of place, local character and distinctiveness of the area.
iv) <i>respect, preserve and where appropriate enhance, heritage assets and settings;</i>	No heritage assets are located in, adjacent to or in proximity to the Site.
v) <i>be well built, accessible, fit for purpose, and adaptable to changing lifestyle, demography and climate;</i>	The proposed development will ensure the Site is accessible to SEND students, meaning it will be appropriate for people with mobility issues. This Application is accompanied by a Flood Risk Assessment. This is discussed further in Section 5.6 of this Chapter.
vi) <i>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);</i>	As above, the proposed development will ensure users with mobility issues or disabilities will be able to use the Site. Public sustainable transport methods are often not a viable option for some SEND students and it is expected that many students will arrive by minibus. To accommodate this, the parking and drop off area will need to be reconfigured. Notwithstanding this, the Site is sustainably located providing opportunities for sustainable transport, via foot, bus and train. These can be used by members of staff at the school.
vii) <i>make a positive contribution to creating a safe and secure environment by integrating measures for security and designing out opportunities for crime;</i>	The proposed development includes the addition of 2.4m security fencing to replace the existing 1.8m fencing.
viii) <i>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);</i>	The nearest dwelling is located 40m to the south of the Site, across Romany Road. Given the intervening road, as well as intervening vegetation found along the southern boundary of the Site, the proposed development will not have any impact on the privacy of the surrounding dwellings. This is also the case for any noise created by the operations of the proposed development. It is noted that planning permission has previously been granted for the land to the north east. However due to the intervening vegetation and informal footpath, there is adequate separation and screening. This Application is accompanied by a Transport Statement and Staff Travel Plan, to ensure the development of the Site does not have

		cumulative impact on the surrounding highway network.
ix)	<i>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;</i>	Existing landscaped features have been retained wherever possible. Please refer to Section 5.5 of this Chapter for further detailing regarding biodiversity net gain and the impact on trees.
x)	<i>ensure that lighting incorporated into developments provides the minimum for public safety, is energy efficient and avoids light pollution.</i>	It is expected that any proposed light fixtures or fittings will be secured by a pre-installation condition.

TABLE 4: POLICY DM5 COMPLIANCE

- 5.3.2 To note, in consultation with WSCC planning officers, the undecided application for residential development to the northeast was highlighted as an important consideration for the landscaping on the Site. Therefore, the landscaping located along the northeast of the Site has been retained, where possible.

5.4 HIGHWAYS AND ACCESS

- 5.4.1 In compliance with **Policy DM15 (Sustainable Transport and Active Travel)**, a Transport Statement (TS) and Staff Travel Plan have been prepared by AtkinsRéalis and submitted alongside this application. The Policy requires new developments to be integrated into the existing transport network and promote sustainable forms of transport.
- 5.4.2 A swept path analysis was conducted as part of the TS. This was undertaken to assess the reconfiguration of the parking and drop-off area. This is a key element of the proposed development; given the reliance of students on private vehicles and minibuses for transport to and from the Site, with many students requiring direct access due to mobility and accessibility needs. The swept path analysis found that the reconfigured car park layout allowed sufficient space for minibuses, large cars, fire tenders and refuse vehicles to access and navigate the Site.
- 5.4.3 In order to limit the number of student-associated trips, students will travel by minibus between the Site and their homes, which will arrive at the school during designated pick-up and drop-off windows between 8.15-9.15am and 15.30-16.30pm. The bus service has been designed in collaboration with the WSCC travel team, who deliver the bus service. The minibuses will be scheduled to arrive within the same coordinated time period, ensuring that staff can effectively manage pupil movements and maintain a safe environment during the peak arrival and departure periods.
- 5.4.4 A Staff Travel Plan (STP) has been prepared to support the development to encourage staff to use sustainable modes of transport. The STP confirms the Site benefits from good accessibility to walking, cycling, bus and rail services.
- 5.4.5 The following measures, as identified by the STP, will be put in place to encourage the use of sustainable transport methods:

- Increase the marketing and promotion of the STP and travel options;
- Undertaking Personal Travel Planning (PTP) with pupils; and
- Participate in national event days to promote sustainable transport.

5.4.6 A Travel Plan Coordinator (TPC) will be appointed in order to monitor the success of the Travel Plan in encouraging sustainable travel.

Parking

5.4.7 The proposed Site layout includes revised access and parking arrangements, addition of cycle parking and dedicated minibuss provisions.

5.4.8 Due to the limited number of on-site parking spaces, the Transport Statement includes details of an on-street parking survey, carried out during school term time, which assessed the surrounding streets within a 500m walking distance of the Site that permit on-street parking, to assess whether the surrounding area would be able to accommodate the added parking demand.

5.4.9 The survey identified four streets (Alder Close, Deerswood Close, Poplar Road and Willow Crescent) experiencing high existing demand, at or close to capacity during parts of the survey. However, even if these streets are excluded entirely from the assessment, the remaining surveyed streets provided spare capacity of between 1.5 and 1.9 times the projected demand throughout the survey periods. This demonstrates that sufficient on-street parking capacity exists within comfortable walking distance of the Site to accommodate future staff parking demand, without reliance on the more constrained streets.

5.5 ECOLOGY, TREES AND BIODIVERSITY NET GAIN

Ecology

5.5.1 A Preliminary Ecological Appraisal (PEA) and Ecology Survey Report have been submitted as part of this Application. The PEA comprised findings from a field survey which was carried out on 19 June 2023. Given the length of time since the survey, an updated ecological walkover was carried out on 17 July 2025 which has informed the Ecology Survey Report. Both should be read in conjunction with one another.

5.5.2 The PEA found that the Site provides limited ecological value due to the extent of existing built form. Some ornamental hedgerow is found on the northern and eastern boundary; patches of neutral grassland on the western and eastern boundary; scattered trees dispersed on the western boundary; and introduced scrub toward the south.

5.5.3 The PEA and updated 2025 survey provide assessment of potential impacts on these habitats and protected species, and recommendations as to how negative impacts can be reduced. These are set out in **Table 5**.

SURVEY FINDINGS	KEY RECOMMENDATIONS
BATS <i>Building (B1) assessed as suitable for roosting bats – 'low suitability'.</i> A Preliminary Bat Roost Assessment and Ground Level Tree Assessment was carried out in July 2025. One tree was identified as having potential roost feature suitability for an individual bat. This tree is proposed to be retained, however so no further surveys are considered necessary.	Advice should be sought from a suitably qualified ecologist where: • The design changes meaning the PRF-I feature would be impacted. • Evidence of bats is found on the Site. Any lighting should be designed in accordance with relevant bat guidance.
REPTILES <i>Low potential for reptiles to be found on the Site. Some suitable habitats are present, including debris piles providing limited opportunities for reptiles to shelter. This is considered relatively isolated in the surrounding urban/ industrial area however, not providing a mosaic of habitats to support a population.</i>	Retention of fruiting hedgerow specimens.
BIRDS <i>Potential for nesting birds in trees, hedgerows and shrubs. Buildings, structures and debris piles also provide nesting opportunities.</i>	Vegetation clearance should be undertaken outside bird nesting season. If this is not possible, a nesting bird check should be undertaken prior to works. If an active nest is identified, an exclusion zone should be established. All site personnel should be brief on procedures to follow where nesting birds are encountered.
HEDGEHOGS <i>Potential for hedgehogs to forage.</i>	Standard mammal mitigation measures implemented into the schemes design.
OTHER SPECIES <i>The following species were considered highly unlikely to be present due to lack of suitable habitats:</i> • Badger • Hazel dormouse • Water vole • Great crested newt	Given that they are considered highly unlikely to be present, no recommendations have been made.
INVASIVE AND NON-NATIVE PLANT SPECIES <i>Examples of cotoneaster sp. as well as buddleja sp. were found within the ornamental hedgerows.</i>	An invasive species management and removal plan should be implemented within development proposals. A suitability-qualified ecologist or contractor should be employed to carefully dig up any invasive species specimens on site.

TABLE 5: FINDINGS AND RECOMMENDATIONS FROM THE 2023 PEA AND 2025 ECOLOGY SURVEY REPORT

- 5.5.4 The recommendations made in the surveys can be secured through appropriately worded condition. We would anticipate conditions are proposed to secure details

of the landscaping as well as for a Construction Environmental Management Plan (CEMP), or similar.

Trees

- 5.5.5 An Arboricultural Impact Assessment (AIA) has been carried out by AtkinsRéalis and submitted alongside this Application. The AIA looked to assess the impact of the proposed development on the trees located on the Site.
- 5.5.6 The AIA identifies 45no. arboricultural features on the Site. Their classification is as follows:
- No trees were categorised as Category A, meaning of high quality and therefore should be protected.
 - 6no. trees were considered Category B, meaning of moderate quality.
 - 37no. trees were considered Category C, meaning trees of low quality.
 - 2no. trees were considered Category U, meaning trees of such quality that it cannot realistically be retained as a living tree for longer than 10 years.
- 5.5.7 The AIA further confirmed that no veteran trees, ancient woodland or TPO trees were found on the Site.
- 5.5.8 The alignment of the proposed development has been carefully considered to ensure retention of higher quality trees. The trees proposed to be removed as part of the development are categorised as Category C trees, so of low quality with an estimated remaining life expectancy of at least 10 years. The loss of the trees is unavoidable.
- 5.5.9 The AIA is supplemented by a Tree Protection Plan (TPP), which sets out the proposed mitigation measures to prevent any adverse impact on existing trees on the Site during construction. These include a programme of site supervision by an Arboriculturist before, during and after the construction of the proposed development.

Biodiversity Net Gain

- 5.5.10 For developments in England, Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). As a result of this, applicants must deliver a BNG of 10%, ensuring that developments will result in more or better quality natural habitat than there was prior to the development.
- 5.5.11 Further, **Policy DM18 (Biodiversity)** of the Local Plan requires a Biodiversity Net Gain Report and Metric to be submitted to demonstrate that a 10% net gain for biodiversity can be achieved on the Site.
- 5.5.12 As a result of this, a BNG Assessment has been prepared and submitted as part of the Application. The BNG Assessment provides an assessment and calculation of biodiversity units pre- and post-development in the context of the mitigation hierarchy.

- 5.5.13 Retaining the existing landscaping features have been considered from the outset, including the retention of existing trees and of a small area of modified grassland. Enhancements of biodiversity have been incorporated through the creation of additional features such as neutral grassland, a vegetated garden habitat, new urban trees and a new ornamental hedgerow.
- 5.5.14 Despite the retention and enhancement of habitats, the proposal is unable to deliver 10% BNG, with the proposal resulting in a 7.06% net gain for area habitats, and limited hedgerow units. No feasible option to achieve the required 10% net gain is found, given that the development is for the redevelopment of an already developed Site. Therefore, additional biodiversity units will be required through either registered off-site biodiversity gains or purchasing statutory biodiversity credits.

5.6 FLOOD RISK AND DRAINAGE

- 5.6.1 The Site's car parking area and drop off zone is located within Flood Zones 2 and 3a. Under current guidance within the NPPF, all developments known to be at risk of flooding should apply a sequential risk-based approach to the location of development as per Policy F5: The Sequential Test of the NPPF.
- 5.6.2 Given the Site's lawful and established use as an educational facility, which for the large part falls within Flood Zone 1 (including the existing building), it is considered that the Sequential Test is passed. The proposals do not involve a change of use and will not intensify the vulnerability of the existing use. Instead, the development comprises works associated with the operation and improvement of the existing educational facility, which will remain in use for education, and therefore there are no alternative sites that would be appropriate.
- 5.6.3 Notably, the area of the Site located within Flood Zones 2 and 3 comprises the existing car parking and drop-off area. The proposed development does not seek to change the function of this area, which will continue to function as a car park and drop-off facility. Instead, the proposals are limited to improvements and resurfacing of the existing hardstanding, enhancing the quality and functionality of an existing part of the Site. Such works would likely be classed as 'water compatible' development as amenity space.
- 5.6.4 Notwithstanding the above, Policy F5, Paragraph 2 sets out where a sequential test is not required, including '*small non-residential extensions (with a footprint of less than 250m²)*'. The proposed extension to the building is below 250m² and is not proposed in an area at risk of flooding. Therefore the sequential test is not applicable to the extension.
- 5.6.5 Policy F6: Development in Areas at Risk of Flooding from Rivers or the Sea of the NPPF requires developments falling within flood zones 2, 3a or 3b to carry out an exception test if meeting the circumstances set out in Annex F, table 3.
- 5.6.6 Annex F, Table 3 finds that car parks do not require an exception test to be carried out when located in Flood Zones 2 and 3a, given that car parks are considered a less vulnerable use in the NPPF. Therefore, as the area in Flood Zones 2 and 3a are only located in the car parking area, there is no requirement for the development to be subject to the exception test.

- 5.6.7 As per **Policy DM20 (Flood Risk and Sustainable Drainage)** a Flood Risk Assessment (FRA) has been carried out by AtkinsRéalis and submitted alongside this application.
- 5.6.8 The Assessment concludes that although the Site is at some risk of flooding, the risk is likely to be relatively small; in which mitigation and/or flood resilient building techniques can manage this risk. The Assessment also confirms the Site is not at risk of other forms of flooding including tidal, fluvial, pluvial, groundwater, or sewer flooding; nor is it at risk of flooding from reservoirs, canals or artificial sources.
- 5.6.9 A Surface Water Drainage Strategy Statement has been submitted alongside this Application, which outlines the drainage strategy for the scheme. Given that the proposed development is on an existing Site, the development is constrained by the existing drainage infrastructure of the building.
- 5.6.10 Further, the existing hardstanding has had to be considered to inform the drainage scheme. This means infiltration measures cannot be relied upon, and ponds, basins, swales are constrained by the retained development and external-space requirements. Therefore, surface water will be managed through positive site grading away from the retained building, with runoff collected via rainwater downpipes, channel drains and gullies. The drainage system incorporates primary treatment measures, including trapped gullies, proprietary channel outlets and silt-trap chambers, before conveying flows through a new private surface water drainage network for discharge to the existing retained private surface water system.

5.7 OTHER ENVIRONMENTAL MATTERS

Noise

- 5.7.1 **Policy DM22 (Pollution)** requires developments to not contribute to, be put at risk from, or be adversely affected by unacceptable levels of noise pollution.
- 5.7.2 The existing use of the Site is for educational facilities. The proposed development will be compatible with the existing educational use of land.
- 5.7.3 Further, the nearest noise-sensitive uses are the dwellings across Romany Road. These are located over 40m to the south of the Site. Given the intervening road, as well as the intervening vegetation along the southern boundary of the Site, it is unlikely that noise will adversely affect these southern dwellings.
- 5.7.4 Further, on land to the northeast of the Site, there is currently an undetermined planning application for 78 residential dwellings. The proposed development of the dwellings is set back from the boundary of the Pines, with a footpath separating the two sites, as well as a proposed internal access road serving the proposed dwellings. Therefore, although the application to the northeast has not been determined, it is unlikely that the proposed development at The Pines will impact the dwellings adversely.

6 CONCLUSIONS

- 6.1.1 This Planning, Design and Access Statement has been prepared by DHA Planning on behalf of West Sussex County Council ('the Applicant') to accompany a full planning application for an extension and external works at the Pines, Faraday Close, Worthing BN13 3RB, required to facilitate its operation as a satellite facility for Oak Grove College.
- 6.1.2 The full description of the development is as follows:
- "External alterations and extension of an existing building, together with the reconfiguration of the car park and access routes, and revised/additional hard and soft landscaping, boundary treatments, and ancillary buildings/structures/plant, with other associated works; to facilitate its refurbishment and repurposing for use as a satellite special education needs (SEND) school."*
- 6.1.3 The proposal aligns with the NPPF and local planning policies, in particular those relating to the principle of development and the great weight given to education provision through planning decisions. This Statement demonstrates the considerable and immediate need for the development proposed to increase the SEND teaching spaces in Oak Grove College, as well as across Worthing.
- 6.1.4 The addition of a new satellite campus would allow for Oak Grove College to provide SEND students with good quality teaching, including access to the specialised support they require.
- 6.1.5 Based on the information provided to accompany this application, it has been demonstrated that the proposed development is in accordance with the policies of the Local Plan and other material considerations including the NPPF. It is therefore requested that planning permission be granted, subject to appropriate conditions.