Development Control – Delegated Officer Report

Application Number: AWDM/1761/23 Recommendation: Refuse

Site: Wolsey, 179-181 Brighton Road, Worthing

Proposal: **Revised Description: Extension and conversion of the loft space to include front dormer, 6 no. rear dormers, rooflights and sun tubes to form 1 no. one bedroom flat. New vehicle access and parking.**

Date of site visit: 29.02.2024

Neighbours checked: Y

Additional neighbour notifications: N

Site and Surroundings

The site comprises of a two storey property located on the north side of Brighton Road opposite the seafront. It is set within an attractive terrace consisting predominantly of dwellings and some guest houses, all designed in symmetrical pairs with their neighbour with matching two storey bay windows positioned each side of decorative verandas set above the entrance door to their front elevation, rendered and with stucco detailing and arched windows. The front garden area is mainly paved and enclosed with a low brick and flint wall to the street frontage, matching others in the terrace. The premises have been licenced as an HMO from December 2020 since being subject to mandatory licencing requirements. A Lawful Development Certificate established the lawful use of the property as an existing 19-bedroom Sui Generis House in Multiple Occupation (AWDM/0455/23 refers). The premises are unoccupied and appear to be undergoing renovation works currently. The site is located within Flood Zones 2/3.

Proposal

Permission is sought for the conversion of the roofspace and construction of 6 dormer windows to the rear outrigger and one front dormer window. The front boundary wall is indicated as being removed, with a central pier remaining and a new vehicular crossover would be formed with access onto Brighton Road and with the existing paved front garden area used for car parking.

The submitted Design and Access Statement has described the proposal in paragraph 2 as *'to support a live in carer to help with the day to day running of the HMO.'* and later goes onto state that *'The addition of a side dormers will provide an annex for a full time manager for the HMO'*

However, during the course of the application the applicant's agent has clarified that the use of the new accommodation would be a flat and would be entirely separate from the HMO accommodation and would not share any facilities with the HMO and would potentially be occupied by the owner, although not necessarily as their main

residence. A revised description has been agreed as above and therefore the application should be considered on the basis of a proposed self-contained flat within the converted and extended roofspace and with associated parking and vehicular access.

Relevant Planning History:

WB/113/68/FULL Alterations to premises in connection with use of accommodation as extension to adjoining hotel, 179 Brighton Road. Approved 5.3.1968

WB/00/00163/FULL - Retile with Redland 49 tiles colour grey
STATUS: CON 27th March 2000.

AWDM/0455/23 Application for Certificate of Lawfulness for Existing Use as a 19-bedroom HMO (Sui Generis) with no more than 1 occupant per room. Approved 02.11.2023

Consultations:

National Highways have responded as follows:

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. In the case of Worthing Borough, our interest relates to the A27 trunk road.

Given the nature and location of this proposal, I suspect that we may have been consulted in error. As the A259 Brighton Road is part of the local road network, West Sussex County Council should be consulted.

However, for clarity, in terms of impact upon the A27 trunk road, we are content that the proposals would not have a severe impact upon the safety and reliability of the strategic road network and accordingly offer no objection.

The **Highway Authority** raises no objection and has commented as follows:

Summary and Context
This application seeks new dormers to provide owners/manager accommodation and provision of new vehicular access. The site is located on Brighton Road, an A-classified road subject to a speed restriction of 30 mph. Following an inspection of the submitted application documents, WSCC in its role as Local Highway Authority (LHA) raises no highway safety concerns for this application.

The LHA previously provided consultation advice for this site for application AWDM/0455/23, raising no highway safety concerns. The Local Planning Authority (LPA) permitted the application.

Content
A new 4.2m wide vehicle crossover (VCO) is proposed fronting the site on Brighton Road. From inspection of the submitted plans and WSCC mapping, there are no apparent visibility concerns with the proposed access point on Brighton Road. The proposed access works will be subject to a licence obtained through the local Highway Area Office and constructed to a specification agreed with the local Highway Area Engineer. Two car parking spaces are proposed, which the LHA assumes will be utilised by the proposed managers flat. Clarification should be provided if a different parking allocation is proposed. Nevertheless, the proposed parking provision is considered sufficient to serve the proposed flat. On-site turning does not appear achievable, so cars may have to exit in a reverse gear – however, this is not anticipated to give rise to an adverse highway safety impact, owing to good forward visibility along Brighton Road in this location.

No details of cycle parking provision have been provided. Cycling is a viable option in the area, and the LHA would request that secure cycle parking provision be provided for the proposed flat if there is space within the site to do so.

Conclusion
The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 115), and that there are no transport grounds to resist the proposal.

If the LPA are minded to approve the application, the following condition and informative should be applied:

Condition
Cycle parking
No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority.
Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

Informative
Vehicle Crossover – Minor Highway Works
The applicant is advised that in addition to obtaining planning permission that they must also obtain formal approval from the highway authority to carry out the site access works on the public highway. The granting of planning permission does not guarantee that a vehicle crossover licence shall be granted because the highway license process considers wider factors than are considered by the Highway Authority at planning stage.

Additional information about the licence application process can be found at the following web page:

http://www.westsussex.gov.uk/roads-and-travel/highway-licences/dropped-kerbs-or-vehicle-crossovers-for-driveways-licence/

Southern Water has made the following comments**:**

Southern Water requires a formal application for any new connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link:
southernwater.co.uk/developing-building/connection-charging-arrangements

In situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.

- Reuse
- Infiltration
- Watercourse
- Storm sewer
- Combined Sewer

Guidance on Building Regulations is here:
gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).
Website: southernwater.co.uk or by email at:
SouthernWaterPlanning@southernwater.co.uk

The Council's **Environmental Health Officer** has raised no objection and recommends the following conditions:

Works of construction or demolition, including the use of plant and machinery, necessary for implementation of this consent shall be limited to the following times.

Monday - Friday 08:00 - 18:00 Hours
Saturday 09:00 - 13:00 Hours
Sundays and Bank Holidays no work permitted

Any temporary exception to these working hours shall be agreed in writing by the Local Planning Authority at least five days in advance of works commencing. The contractor shall notify the local residents in writing at least three days before any such works.

Reason: To safeguard the residential amenity of the area

No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate, but not necessarily be restricted to the following matters:

- *the anticipated number, frequency and types of vehicles used during construction,*
- *the method of access and routing of vehicles during construction,*
- *HGV construction traffic routings shall be designed to minimise journey distance through the Councils Air Quality Management Areas (AQMA's),*
- *the parking of vehicles by site operatives and visitors,*
- *the loading and unloading of plant, materials and waste,*
- *the storage of plant and materials used in construction of the development,*
- *the erection and maintenance of security hoarding,*
- *a commitment to no burning on site,*
- *the provision of wheel washing facilities and other works required to mitigate*
- *the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),*
- *methods to control dust from the site,*
- *a commitment to following BS5228:Code of Practice for noise and vibration control on construction and open sites,*
- *details of public and neighbour engagement both prior to and during construction works.*

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers during construction.

The **Council's Drainage Consultant** has made the following comments:

The applicant is applying for front dormer. 6 no. rear dormers, rooflights and sun tubes, owners/manager accommodation with kitchen/living area and vehicle access.
Following a review of the submitted information, we have no objection on surface water grounds. Due to the site, size, location, and type of development we would recommend the approval of the application.

The **Council's Private Sector Housing** team has commented as follows:

No objection on PSH grounds, however the applicant should be made aware of the following:

The property will be a licensable House in Multiple Occupation, and the licence would include the proposed second floor accommodation.

The proposed second floor accommodation requires a lobby between the common parts of the building and the accommodation to provide the required 30-minutes fire separation, and to connect the bedroom and living area. This could be formed on the proposed landing to avoid entrance doors being positioned directly at the head of the stairs.

Representations:
None received

Relevant Planning Policies

Worthing Local Plan 2020-2036 (WBC 2023): Policies:
SP1 (Presumption in Favour of Sustainable Development)
SS1 (Spatial Strategy)
DM1 (Housing Mix)
DM2 (Housing Density)
DM5 (Quality of the Built Environment)
DM15 (Sustainable Transport and Active Travel)
DM16 (Sustainable Design)
DM17 (Energy)
DM20 (Flood Risk and Sustainable Drainage)
DM22 (Pollution)

National Planning Policy Framework (2023)
National Planning Practice Guidance
SPD 'Space Standards' (WBC 2012)
SDP 'A Guide to Residential Development' (WBC 2013)
CIL Charging Schedule (Aug 2021)

Planning Assessment

Principle of Development

Paragraph 11 identifies at the heart of the NPPF a presumption in favour of sustainable development. For decision making this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.

The Worthing Local Plan was adopted on 28th March 2023. Policy SS1 sets out the Housing supply over the period 2020-2036 and gives a total figure of 3672 (an annual target of 230 dwellings per annum).

Paragraph 76 of the NPPF states that local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision-making purposes where:

a) The adopted plan is less than 5 years old; and

b) That adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.

Paragraph 77 goes on to state that where there has been a significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the Plan period).

The most recent housing trajectory and 5 year housing land supply for Worthing can be found in the Annual Monitoring Report 2022-23. Table 9 indicates the Five Year Supply measured against the adopted WLP annual target of 230 dwellings plus a 20% buffer, and demonstrates a 7 year supply of deliverable sites.

To maintain the supply of housing paragraph 79 of the NPPF requires local planning authorities to monitor progress in building out sites with planning permission. Where the Housing Delivery test indicates delivery has fallen below 75% of the local planning authorities housing requirement over the previous three years, the presumption in favour of sustainable development applies, in addition to the requirement for an Action plan and 20% buffer.

The Housing Delivery Test published in January 2022, and covers the period from 2018/19 - 2020/21 (prior to adoption of the Local Plan). Worthing Borough Council scored 35%. Therefore the presumption in favour of sustainable development applies as the delivery of housing was less than 75% of the housing requirement over the previous three years.

Local Plan policy DM1 recognises the important role well designed Houses in Multiple Occupation (HMOs) play in providing housing for people on low incomes, those on benefit payments and young professionals. They are often the only choice of housing for people who would otherwise be homeless.

Policy DM1 states that when considering proposals for the conversion of dwellings into smaller units of self-contained accommodation, the proposal must provide a high standard of accommodation that complies with internal space standards and requirement for private outdoor space and considerations include the impact on the mix of dwellings locally, the impact on the character of the area, and the impact on the amenity of adjoining dwellings.

The supporting text to the policy stresses the importance of retaining existing housing including HMO’s and emphasises the need to ensure a range of dwelling types and sizes to meet the identified housing needs, facilitate housing choice and achieve mixed and balanced communities.

The proposal is for the conversion and extension of the roofspace to form a self-contained flat and the existing HMO accommodation would be retained but with alterations indicated to include ensuite facilities and changes to the layout of the ground floor communal kitchen area. The HMO would still comprise of 19 bedrooms.

In relation to the proposed flat accommodation within the roofspace the owner has stated in an email that: *I am not an HMO manager but it's logical to assume that my*

presence will ease the management of Wolsey and will help the manager to monitor the residents.
The management statement for Castle and Wolsey operations and draft agreement with AWC housing clearly states manager's accommodation and office at 6 Windsor. Wolsey loft flat is owner's accommodation and I plan to use it for my personal living and working.

I don't think it's correct to say that the loft will be completely isolated from temporary accommodation HMO and by all means my physical presence will help [Castles Manager] to manage both sites. I am not Wolsey manager but will assist Castle management to monitor the site.

Whilst the accommodation is intended to be occupied by an owner, it nevertheless proposes one self- contained flat and it is not intended to have any specific relationship with the HMO accommodation, there therefore should be determined on that basis.

The site is located within a sustainable location, within walking or cycling distance to local services and amenities, and public transport links including bus services in Brighton Road. The proposed development would make a small contribution to meeting housing need in the Borough by providing one additional 1-bedroom dwelling.

The proposal should principally be assessed in relation to the presumption in favour of sustainable development as set out in paragraph 11 of the NPPF and weighed against the effects of the development proposals on the visual amenities of the site and surrounding area, the effects on living conditions for existing and future occupiers, highways, access and parking considerations, flood risk, and sustainability and biodiversity considerations.

Visual amenity

Chapter 12 of the NPPF sets out the policies to achieve well-designed places. In paragraph 131, it advises 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.

The NPPF emphasises securing high quality design that (amongst other things): will function well and add to the overall quality of the area for the lifetime of the development, is visually attractive as a result of good architecture, layout and appropriate and effective landscaping; is sympathetic to local character and history; maintains a strong sense of place using the arrangement of streets, building types and materials to create attractive, welcoming and distinctive places to live; and, with a high standard of amenity for existing and future users (paragraph 135), and that permission should be refused for development that is not well designed, especially where it fails to reflect local design policies or government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes (paragraph 139).

The Worthing Local Plan sets out in Policy DM5 requirements that all new development 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.

The Councils Supplementary Planning Document ‘A Guide for Residential Development’ provides policy and design guidance for new residential development.

Paragraph 3.3 it states that: A key element to the achievement of good design is an appreciation of the context in which it is situated. During the design process of any new development consideration will need to be given to its local setting, the surrounding densities, local building heights and other local features.

The proposed roof extensions would comprise of three dormer windows to each side of the rear outrigger and would be relatively large in scale, giving a top-heavy appearance to the building. The existing rear outrigger appears as a subservient feature at the rear of the building matching others in the terrace and with the addition of the six proposed dormer extensions would appear as an overly dominant and

incongruous feature in the terrace. Furthermore their detailed design and appearance would not reflect the proportions or detailing of the recipient building.

To the front elevation, a more modest pitched roof dormer is proposed positioned centrally between the two bay window projections. Although dormer windows are not a particular feature on this terrace, there are other similar examples within the terrace at No. 185 and No.197 Brighton Road. although these do appear slightly smaller and set lower on the roofslope. Nevertheless, the proposed front dormer is relatively well proportioned and would be set centrally between the two bays where it would appear reasonable in this context, and detailing has been indicated to match the existing building and would not cause any significant harm to visual amenity.

Car parking would be introduced to the site frontage and would appear to utilise the existing hardstanding which consists of paving, and would involve removal of the front boundary wall, although no precise details have been provided in this respect or as to any of the existing planted beds would be retained. As originally built, the dwellings in this terrace have low front boundary walls in brick with stone detailing providing enclosure to the front garden areas and provide continuity and coherence with others in the terrace and the wider streetscene. The drawings indicate that the whole of the boundary wall would be removed and with only two brick piers remaining. No indication has been given as to whether any of the planted beds would remain. The lack of enclosure by removal of the front boundary to its double width frontage and exposure of the hardstanding given over to be given over to car parking, would result in an open and stark frontage that would lack coherence with the surrounding streetscene and would be detrimental to visual amenity.

The effects of the development on the residential amenities of existing and future occupiers

The NPPF emphasises the importance of creating places that have a high standard of amenity for existing and future users (paragraph 135). The quality of living environment derives not only from the amount of internal space, but also relates to issues of overlooking and privacy, natural daylight and outlook as well as the importance of private amenity space and the quality of the living environment in terms of the effect of noise and disturbance.

The site currently provides 19 rooms in the existing HMO with a maximum permitted occupancy of 19 stipulated in the licence. However the existing floor plan drawings are misleading and appear to show a greater number of bedrooms than existed at the time of the lawfulness application and with the proposed drawing pointing towards a reduction in the number of letting rooms. Despite this, the proposed drawings would provide no change in the number of bedrooms at ground and first floor level as existed at the time of the application with 19 rooms retained, albeit with some layout changes now indicated to include ensuite facilities in nine of the rooms, and alterations to the rear ground floor communal kitchens.

The proposed accommodation would provide an additional one-bedroom flat. In terms of the standard of accommodation, the layout proposed for the second floor accommodation does not show any separation from the communal areas, which would

be required for privacy and particularly as indicated by Private Sector Housing for fire separation.

The application details do not provide clear calculations or accurate details to measure compliance against the Nationally Described Space Standards. An overall floor area of approximately 56 square metres for areas with a floor to ceiling height over 1.5m can be calculated from the drawings. Floor to ceiling heights have been indicated as 2.051m for the rear outrigger but with the dormer window ceiling height scaling at 2.26m but nevertheless below the 2.3m threshold required for 75% of the overall floor area. To the main roofspace an approximate value of 26 square metres can be scaled from the drawings although the accuracy of this is not clear based on the information provided. Nevertheless this would represent considerably less than 75% of the GIA and it has therefore not been demonstrated that the proposals would meet the required standard of accommodation.

It is also noted that the main windows are located in the bedroom of the unit whereas the living room is served only by the small south facing window in the new dormer and rooflights. The outlook for the proposed unit is poor as it is considered inadequate for living areas where people generally spend more of their time.

No private amenity space would be provided for the new flat and there is little scope to provide this. Some limited outdoor space exists at the rear of the building but this is shared by HMO residents, accessed through the communal kitchen areas. Worthing Space Standards continue to apply under Local Plan policy DM2 for the provision of external space and states that 20 square metres per flat should be provided which is normally in the form of communal areas. The inability to provide such space for the proposed flat is limited by the existing HMO use and is a symptom of an over intensive use and overdevelopment of a restricted site which already has a limited amenity area, and the use of the front garden area for parking would exacerbate this issue.

In terms of the intensification of the use of the property, it is considered that the introduction of an additional flat contained entirely within the roofspace which would provide a poor standard of accommodation would represent an overdevelopment of the site.

The intensification of the use of the property is unlikely to give rise to any significant impact to neighbour amenity, and in terms of the impact of the physical extensions, the scale and position of the proposed dormer extensions would not give rise to any significant impact in terms of loss of light or outlook to neighbouring occupiers. However, it is considered that the position and number of roof extensions on the rear outrigger would be unneighbourly and overbearing to neighbouring occupiers and result in an increase sense of enclosure. The proposed flat would require outlook from the main windows in order to provide a suitable standard of accommodation. However this is reliant on a side outlook to the east and west in close proximity to neighbouring dwellings which if approved would be unneighbourly in terms of loss of privacy. Whilst those serving the two walk-in wardrobe areas and utility and bathroom could be obscure glazed, the perception of overlooking from the presence of six dormer windows would be increased considerably and the bedroom itself would require clear glazing to provide outlook.

Access and Highways

The site can be considered sustainable being within walking distance of Worthing town centre with access to shops, services and public transport links, reducing the reliance upon the private car. Despite the details provided on the drawings, the application forms have not indicated any additional car parking proposed. The Highway Authority has nevertheless assessed the application on the basis of two new parking spaces to be allocated for the new flat accommodation and raises no objection to this provision or to the new vehicular access. Cycle storage could be secured by condition if approved to promote sustainable travel and is a viable option in this location.

Flood risk

The application as originally advertised has not made clear that the proposals would form a self-contained flat and has not been supported by a full flood risk assessment but provides a Householder and Minor Development flood risk form stating that floor levels would be set no lower than existing levels and with flood proofing incorporated in to the development where appropriate. However the proposals would result in the formation of a new dwelling within flood zone 2/3 and therefore a full flood risk assessment would be required. More information would have been sought had planning permission been granted.

Sustainability and Biodiversity

The constraints imposed by the scale of development and the existing building with no additional footprint proposed limit the opportunities for incorporating sustainable construction or renewable energies. However further details outlining sustainable design and energy measures as well as improvements to biodiversity could be secured by condition if approved.

The Design and Access Statement states that surface water will be managed in a sustainable drainage system and the Council's Drainage Consultant has raised no objection.

CIL

The application if permitted would be subject to a contribution towards the CIL.

Conclusion

Whilst the proposals would retain the existing HMO use and provide an additional one-bedroom flat with car parking, the contribution the development makes in terms of meeting housing demand needs to be weighed against the consideration of the impact on the visual amenities of the site and surroundings, on the living conditions for existing and future occupiers, highways, access and parking considerations, flood risk, and sustainability and biodiversity considerations. It is considered that the adverse impact of the proposals on visual amenity, and on the amenities of existing and future occupiers and in terms of flood risk as outlined in the sections above would significantly and demonstrably outweigh the benefits of the scheme.

Recommendation

REFUSE for the reason:-

1 On the basis of the limited and conflicting information available, the Local Planning Authority is not satisfied that the proposed development would provide an adequate standard of accommodation for future occupiers. Furthermore, having regard to the scale and positioning of the proposed dormer extensions, the proposed development would be unneighbourly and detrimental to the amenities of neighbouring occupiers. As such the proposed development would be contrary to policies DM1, DM2 and DM5 of the Worthing Local Plan and the relevant paragraphs of the NPPF.

2. The proposed development would, by reason of its scale, siting, and design, represent a dominant and unsympathetic overdevelopment of the site, detrimental to the visual amenities of the site and its surroundings. As such the proposed development would be contrary to policy DM5 of the Worthing Local Plan, and the relevant paragraphs of the National Planning Policy Framework.

3. The loss of the front boundary wall and proposed parking area would represent an unsympathetic form of development resulting in a lack of coherence in the streetscene which would be detrimental to the visual amenities of the site and surrounding area. As such the proposed development would be contrary to policy DM5 of the Worthing Local Plan, and the relevant paragraphs of the National Planning Policy Framework.

Informative

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

Is recommendation contrary to letter(s) of representation? N

Case Officer: Rebekah Hincke Date: 18.03.2024

Authorised by: Louise Prew Date: 05/04/2024