



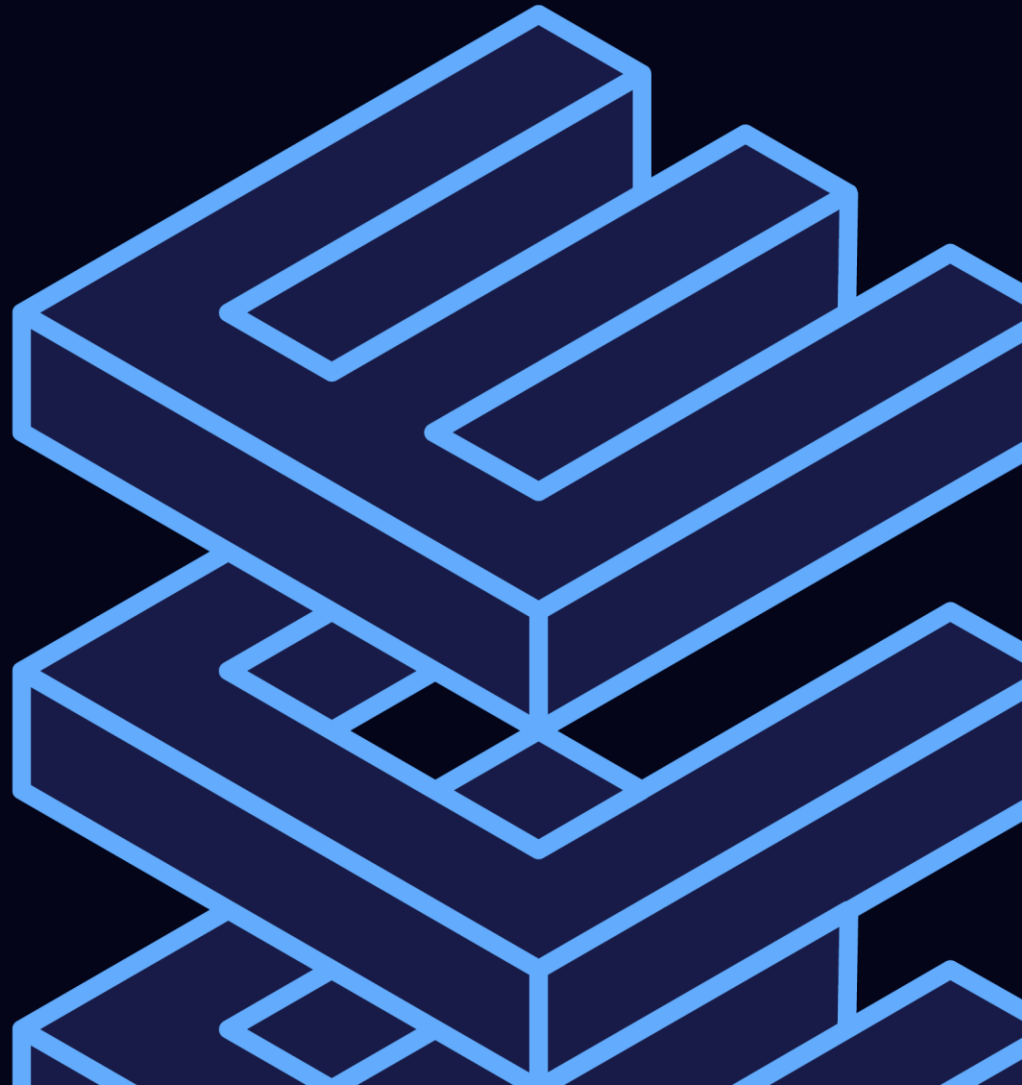
ECE Planning

Planning and Affordable Housing Statement

including Lighting Assessment and Economic
Assessment

Durrington Gasworks, Martlets
Way

May 2026



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Project Name: Durrington Gasworks, Martlets Way

Location: Durrington Gasworks, Martlets Way

Client: Bellway Homes Limited (Southern Countries)

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Issue	Date	Author	Checked	Notes
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1. Introduction

- 1.1. This Statement has been produced by ECE Planning, on behalf of the applicant, **Bellway Homes Limited (Southern Countries)**, in support of a Full Planning Application for the following development relating to Land at Durrington Gasworks, Martlets Way, Goring (the Site). The description of development is as follows:

Full Planning Application for mixed-use development comprising 123 dwellings and commercial floorspace with associated parking, landscaping, open space and drainage.

- 1.2. The proposed development represents the efficient and sustainable reuse of a vacant brownfield site, which has remained unused for a significant time. The Site is allocated within the Worthing Local Plan (2023) under Site Allocation A10: Martlets Way, for mixed-use development. The allocation sought an employment-led scheme, for the delivery of approximately 10,000sqm of employment floorspace, supported by a minimum of 28 dwellings to facilitate delivery. This site was first allocated for employment development in the Worthing Local Plan 2003, with evidence gathering beginning as early as 1995. However, despite being identified for employment use for over two decades, the site has not been developed as originally intended, due to a range of technical, market, and viability challenges.
- 1.3. As such, extensive viability evidence demonstrates that the delivery of an employment-led scheme on this Site is not feasible or achievable. Challenging market conditions, together with significant abnormal redevelopment costs, have fundamentally undermined the viability of delivering large-scale employment floorspace. In these circumstances, and consistent with paragraph 127 of the National Planning Policy Framework, there is no reasonable prospect of the Site coming forward in the form originally envisaged by the allocation. Therefore, a greater quantum of residential development is required to ensure that development can come forward at this site
- 1.4. On this basis, Bellway Homes proposes a deliverable, policy-compliant, and sustainable mixed-use development that will provide 123 new homes alongside appropriately scaled commercial floorspace. The proposals maximise the potential of this underutilised brownfield Site, make a meaningful contribution towards meeting identified housing needs within the Borough, including affordable housing provision, and support the continued regeneration of a key allocated site in a highly accessible location.
- 1.5. The application site is the second Bellway development in the area, located to the west of the Former HMRC site known as Elizabeth Square Phase 1, which is currently under construction. The application site at Durrington Gasworks will be Elizabeth Square Phase 2. The proposed layout and design has been informed by the design principles established within the Phase 1 development.
- 1.6. This Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and a planning appraisal.
- 1.7. The proposals of the site have been informed by local and national planning policies including the National Planning Policy Framework, the Planning Policy Guidance and the Worthing Local Plan (2023).

2. The Site

- 2.1. The application site is located within the Built-up Area Boundary of Worthing, and comprises previously developed land that has been allocated within the Adopted Worthing Local Plan (2023) as an area for employment and residential development (Site Allocation A10 – Martlets Way).



Figure 1 - Site Location Plan

- 2.2. The site (Allocation A10) comprises three main parcels of land;

- The Southern Gas Network (SGN) (northeast land parcel);
- The Martlets Way Site (western land parcel), and;
- The Nib (south-eastern land parcel)



Figure 2 - Parcels of Land within Allocation A10

SGN Site

- 2.3. This land parcel comprises 1.76ha of brownfield land, and was formerly used for gasholders. The site is largely flat and is bounded by mature trees and hedgerows, with areas of hardstanding and grass.

Martlets Way

- 2.4. This land parcel is located on the western side of the allocation, east of Martlets Way and north of Juno Close. The site was formerly sewage works, and extends up to 1.37ha in area, and is open and relatively level. The current primary access to the site is through the Goring Business Park via Martlets Way. This site is under separate ownership and is subject to a Hybrid Application (AWDM/0131/23 - Outline for employment uses - considered further below) which is currently undetermined.

The Nib

- 2.5. This land parcel is south of the SGN land parcel, and extends to approximately 1.05ha in area, and is open and flat. The parcel is accessed from the former HMRC site to the east.
- 2.6. It is important to note that a ransom strip exists between Martlets Way and the SGN site.

Surrounding Area

- 2.7. Outside of the Policy Allocation A10, the Brighton – Littlehampton railway line runs along the northern boundary of the site, with Goring-by-Sea Station, to the west, and Durrington-on-Sea Railway Station, to the east.
- 2.8. To the west of the SGN land parcel and north of Martlets Way parcel, is Goring Business Park and Holm Oak Business Park, an industrial area comprising warehouses, retail space and workshops. To the east of the site is the former HMRC, which has reserved matters approval for 287 new residential dwellings (AWDM/0605/22) and is currently under construction.
- 2.9. To the south of the site is Montrose Close, Juno Close and Barrington Road, all residential in nature. Juno Close was formerly the southern element of the Sewage Works (Martlets Way) however now comprises a residential cul-de-sac providing approximately 35 dwellings and an area of children's play space.
- 2.10. The application site is located in a sustainable location, within a 4 minute walk of Durrington-on-Sea railway station, which provides railway links to the surrounding area, including Worthing, Littlehampton, and Brighton, with travel to London in approx. 1.5 hours.
- 2.11. The site is less than a 10 minute walk from the Mulberry Local Centre which includes a Post Office, Nursery, Pub, café, restaurants and places of worship.
- 2.12. The site is not located within the setting of any listed buildings or within a conservation area. The site is located within Flood Zone 1.

3. Planning History

Planning Policy History

- 3.1. As outlined, the application site is an Allocated Site within the Worthing Local Plan (2023), which was adopted on 28 March 2023 with historic allocations in former Worthing local plans dating back to 2003.



Figure 3 - Site Allocation - A10 Martlets Way (Adopted Worthing Local Plan 2023)

- 3.2. The site (Martlets Way and SGN parcels) was initially allocated in the Worthing Local Plan 2003 for 10,000sqm of 'Business Use (Use Class B1)' employment floorspace, identified as B2 - West Worthing Waste Water & BG Site. Evidence gathering for the allocation began in 1995.

Site Allocation – A10 Martlets Way

- 3.3. The adopted Policy within the Local Plan has outlined an approximate capacity of 10,000sqm of employment floor space and a minimum of 28 residential units. This is expected to be delivered across the next five years.

- 3.4. The Site Allocation Policy A10 reads:

Development requirements for any future development proposals should:

A) deliver a residential and employment scheme comprising of a minimum of 28 residential units and approximately 10,000 sqm employment;

- 3.5. Prior to adoption, the drafting of the Local Plan was supported by a substantial evidence base which has informed the Planning Policy and Site Allocation.

History of Site Allocation during Adoption of Local Plan

- 3.6. During the preparation of the Local Plan between 2016 to 2023, the area was considered an Area of Change (AOC 6 Land Adj to Martlets Way and Inland Revenue).

3.7. AOC 6 underwent a series of relevant amendments during consultation periods Regulation 18 and 19, that led to the final allocation wording of 'a minimum of 28 residential units and approximately 10,000sqm employment.'

3.8. This is briefly summarised below:

Issues and Options Local Plan (May 2016)

3.9. Land Adjacent to Martlets Way and Inland Revenue is considered an 'Area of Change' focused on employment uses and an extension of the existing Goring Business Park.

Representations (February 2018)

3.10. Representations from the site owner, EM Goring, highlighted the development potential of the Martlets Way site and potential contribution to shaping the next stage of the Local Plan. These representations confirmed that commercial development on the site in isolation is unviable, and that residential would be required in order to develop the site. Southern Gas Network (SGN) made similar representations arguing that housing and employment should be delivered on the site.

Regulation 18 – Draft Worthing Local Plan (October 2018)

3.11. Area of Change 6 is included in the local plan, only comprising Martlets Way and the SGN site, excluding The Nib. At this initial stage, the suggested wording required an indicative capacity of 10,000sqm employment space.

The 'Development Requirements' section, which outlines the necessary elements for any future development proposals, stated the following:

provide a mixed use development of employment and residential uses;

Regulation 19 - Submission Draft Local Plan (January 2021)

3.12. During Regulation 19, the draft local plan included The Nib within the allocated area. The Development Requirements set out the following:

a) provide employment development accessed from the west.

g) provide an element of residential development accessed from the east (HMRC A8) but only if it can facilitate the delivery of employment floorspace at Martlets Way and provide for the former gasholder site to be brought forward.

3.13. It is acknowledged that during Regulation 19 Stage, the western portion of the Site Allocation was considered the appropriate area for employment, while the eastern side of development could have the potential for residential.

3.14. This demonstrates that flexibility in the spatial distribution of uses was already embedded within the allocation at Regulation 19 stage.

3.15. Further representations were received at this stage, provided by EM Goring that reinforced the constraints of the site and stated that employment development in this location is unviable in isolation, and needs to be supported by the returns from residential development.

- 3.16. Representations made by SGN concluded that increased housing delivery would be necessary to deliver employment on the site and that residential development could be accessed from the east of the proposed allocation.

Worthing Local Plan Main Modifications Consultation – (April 2022)

- 3.17. Following these representations modifications were made to the Site Allocation Policy, specifying a minimum requirement of residential alongside employment space and access requirements for the SGN site.
- 3.18. The Local Plan was then adopted to include this wording in March 2023.

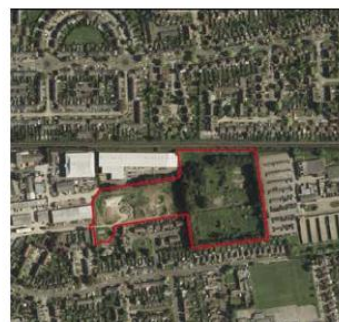
A10 Martlets Way

Ward	Goring	Indicative Capacity	10,000 sqm employment & 28 residential units
Site Area	4.18 ha	Current Land Uses(s)	Vacant, former waste water treatment plant/ former gasholder site
Expected Delivery	0-5 years		

Site Description

4.31 This previously developed site, which is made up of three main parcels of land, lies adjacent to the Goring Business Park located within the existing urban area. It is located in close proximity to Durrington railway station and a number of recently delivered and planned developments (including allocation A8 that lies adjacent to the east). The site, which is now cleared and vacant was, among other things, formerly used as a wastewater treatment plant and as a gasholder. The current access is from either Martlets Way or Woods Way and, with some improvement, it is considered that this access would be suitable for the employment development of the site (industrial / warehousing uses).

4.32 The site has the potential to deliver a quantum of employment floorspace (industrial / warehousing) as identified in the Employment Land Review, which would go some way to meet the identified employment floorspace need over the Plan period. However, there is scope for some residential development to be served via the HMRC site to the east (on the nib), if it can be demonstrated that this secures the delivery of employment floorspace at Martlets Way and, in this context, does not prejudice the bringing forward of the former gasholder site.



Site Constraints

- Current access arrangements from the west will require some improvement.
- There is a risk with piecemeal development on parts of the site, although separate applications may be acceptable if supported by an appropriate planning strategy.
- Previous site uses indicate likely contamination.
- A line of mature established Ilex trees crosses the site.
- Close proximity of residential development may affect any employment layout with a need for adequate screening.
- The SFRA identifies the site as being at a medium risk of flooding.

Development Requirements - any future development proposals should:

- deliver a residential and employment scheme comprising of a minimum of 28 residential units and approximately 10,000 sqm employment;
- ensure that the development does not have an unacceptable impact on the amenity of neighbouring residents. Provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- promote a travel plan to improve the accessibility and sustainability of the site;
- ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;

- development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Protect mature Ilex oak trees that separate the former gas holder site from the former sewage treatment works (subject to appropriate assessment work). New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- ensure that the layout and access arrangements for any development does not constrain or prevent the ability for development to come forward elsewhere within the site as a whole;
- provide an element of residential development accessed from the east (HMRC A8) but only if it can facilitate the delivery of employment floorspace at Martlets Way accessed from the west and provide for the former gasholder site to be brought forward;
- a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk;
- seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- provide an appropriate level of contribution towards highway safety improvements at the A259 Goring Way / Goring Street junction and highway capacity improvements at the A259 / A2032 Goring Crossways junction.

Figure 4 - Site Allocation A10 (Worthing Local Plan 2023)

Planning Application History

- 3.19. The following is considered to be the most relevant planning application history pertaining to the site and surrounding areas.

The Site

- 3.20. The following hybrid application was submitted in January 2023 and pertains to the parcels Martlets Way and The Nib.
- 3.21. **AWDM/0131/23** - Land North Of Juno Close And West Of Hm Revenues And Customs Barrington Road - A Hybrid application seeking full planning permission for the construction of 28 residential dwellings (Use Class C3) and associated soft and hard landscaping, car and cycle parking, and vehicular access, and outline planning permission for up to 6,500 sqm of employment floorspace (E(g)(iii) class (light industrial, former B1(c)), and/or B8 uses (storage and distribution) with all matters reserved apart from access details. This application is currently under consideration.

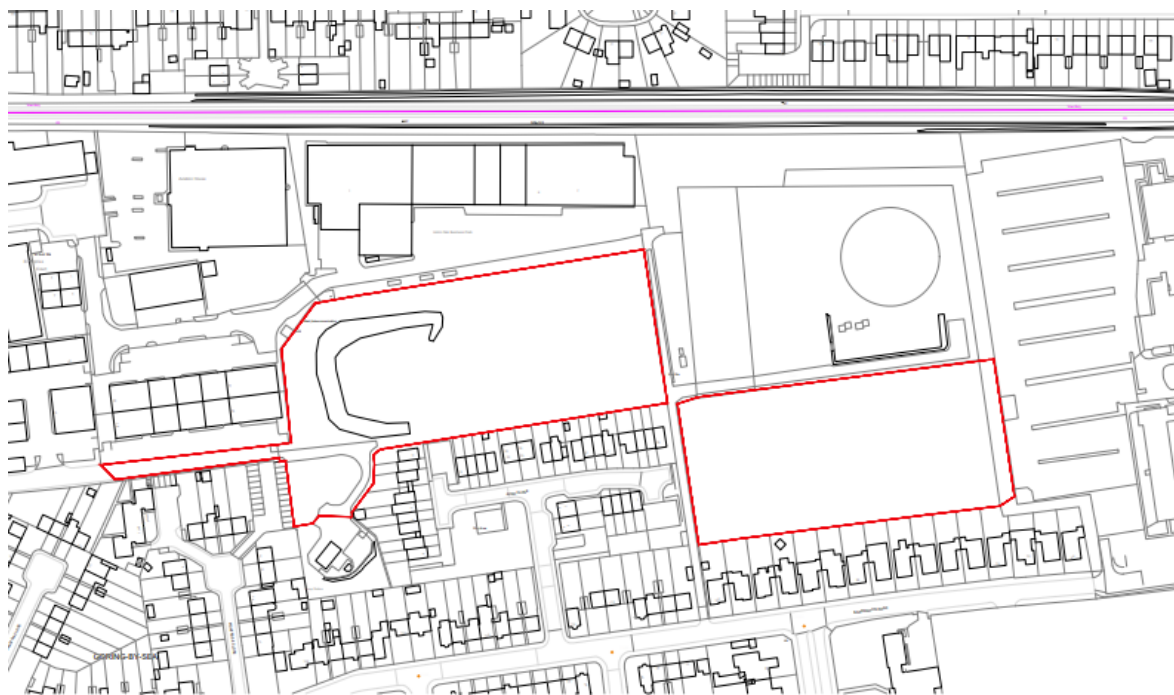


Figure 5 - Location Plan for AWDM/0131/23 showing Martlets Way and The Nib

- 3.22. Figure 6 shows the Outline aspect of the Hybrid Planning Submission for up to 6,500 sqm of employment floorspace (E(g)(iii) class (light industrial, former B1(c)), and/or B8 uses (storage and distribution) in the Martlets Way land parcel.
- 3.23. While Figure 7 shows the Site Layout for full planning permission for the construction of 28 residential dwellings (Use Class C3) and associated soft and hard landscaping, car and cycle parking, and vehicular access at the nib. With access via the approved HMRC site.



Figure 6 - Block Plan for Outline employment aspect of Hybrid Application



Figure 7 - Full Planning Site Layout Plan for residential aspect of Hybrid Application

- 3.24. The application remains undetermined but was placed on hold due to viability concerns relating to the commercial element. Key unresolved matters included drainage strategy, biodiversity net gain, access arrangements, and the relationship with the adjoining SGN parcel.

Surrounding Area

- 3.25. **AWDM/1979/19** - HMRC Barrington Road Worthing West Sussex BN12 4XL - Outline planning permission for the demolition and phased, comprehensive, residential-led redevelopment for a maximum of 287 dwellings (use class C3), of which up to 140 would be houses and up to 158 would be apartments/retirement apartments. Provision of a 68-bedroom care home (use class C2). Provision of car parking, landscaping and associated works. All detailed matters reserved except for access points at the site boundaries

- 3.26. **AWDM/0605/22** - Hm Revenues And Customs Barrington Road Worthing West Sussex BN12 4XL - Reserved matters application for Appearance, Landscape, Layout, Scale and access within the site, for 287 new homes (Use Class C3) together with car parking, landscaping and associated works.



Figure 8 - Approved Site Layout for HMRC site AWDM/0605/22

- 3.27. This development is currently under construction and is known as Elizabeth Square Phase 1. The proposed works subject of this application are known as Elizabeth Square (Phase 2).

Pre-Application and Engagement History

- 3.28. Further to the local plan promotion and existing application, the site allocation has been the subject of sustained engagement with the Council and other stakeholders.
- 3.29. Discussions have consistently centred on how to balance the employment-led allocation with viability challenges, and on the extent to which residential uses can be accommodated. The key milestones are summarised below:

January 2022

- 3.30. A pre-application meeting was held with DHA Planning, Bellway Homes, and Worthing Borough Council regarding the SGN parcel, seeking residential-only proposals. The meeting took place prior to adoption of the Local Plan, with officers confirming support for the employment allocation and advising that residential would undermine the emerging plan.

January 2023

- 3.31. A hybrid application (AWDM/0131/23) was submitted for Martlets Way and The Nib, seeking full permission for 28 dwellings and outline consent for up to 6,500sqm of employment floorspace. The application remains undetermined but was placed on hold due to viability concerns relating to the commercial element. Key unresolved matters included drainage

strategy, biodiversity net gain, access arrangements, and the relationship with the adjoining SGN parcel.

June - August 2023

- 3.32. ECE Planning submitted a pre-application request on behalf of Bellway to explore an alternative strategy, proposing residential development on SGN and The Nib, with employment focused on Martlets Way and the northern SGN edge based on viability evidence that the employment allocation had no reasonable prospect of coming forward (Paragraph 127 of the NPPF). A meeting on 9th August 2023 confirmed that this approach could be acceptable in policy terms, provided it was supported by robust viability evidence and further review by the Major Projects Board.

August 2023 – March 2024

- 3.33. Following that meeting, Bellway and EM Goring sought to refine the scheme, excluding commercial development from the SGN parcel and concentrating employment on Martlets Way. This reflected the prohibitive costs of delivering employment on the SGN land without extensive residential cross-subsidy. Officers confirmed that the revised approach should be presented to the Major Projects Board for further consideration.

April 2024

- 3.34. Major Projects Board Meeting 1: the applicant team presented emerging layouts, access strategy, and a viability position with principle justification supported by Paragraph 127 of the NPPF. Testing showed that delivering the required employment uses would necessitate significant additional residential on SGN and The Nib, with no affordable housing. The Board stressed the importance of robust viability evidence and emphasised affordable housing delivery as a priority.

October 2024

- 3.35. Major Projects Board Meeting 2: An alternative scenario was tabled by EM Goring, proposing additional housing on Martlets Way with reduced commercial provision to enable affordable housing. Discussions focused on the historic context and the viability challenges, but no formal steer was provided. Officers reiterated that clarity on deliverability was essential to progress.

November 2025

- 3.36. Following extensive viability analysis, following feedback from previous pre-apps and Major Project Boards, a pre-application meeting took place between ECE Planning, Bellway Homes and WBC in which ECE Planning presented the viability evidence for three development scenarios at the site (discussed further in this report). The third scenario proposed a mixed-use 123 dwelling scheme providing 30% affordable housing provision, alongside 10 commercial units. Verbal feedback was provided by WBC on the 123 dwelling layout, acknowledging the process that has informed this layout and requesting detailed evidence at submission stage.
- 3.37. A Public Consultation was held on 24th November inviting local residents to review preliminary plans and provide comment and feedback on the proposed development.

February 2026

- 3.38. Following the pre-application meeting in November 2025, viability evidence was formally submitted to the Council in February 2026.

Planning History Summary

- 3.39. The detailed planning history above, from local plan promotion to pre-application engagement and planning applications demonstrates the following key points that have informed the proposed development at the site:

Employment Delivery

- 3.40. The site's employment-led allocation has consistently proven undeliverable in its anticipated form due to costs associated with commercial development and viability constraints relative to the site.
- 3.41. Attempts to deliver substantial employment floorspace, such as through the hybrid application for Martlets Way and The Nib, have stalled as they require significant cross-subsidy and create unresolved design and technical issues.

Residential Potential

- 3.42. Officers have acknowledged that a residential-led approach, retaining some employment provision, could provide a cogent policy argument. This reflects both the challenges of employment delivery and the strategic opportunity to unlock a stalled brownfield allocation for much-needed housing within Worthing Borough who have limited sites of this nature.

Viability as a key driver

- 3.43. Across all discussions, the Council has stressed that any departure from the allocation's original balance must be justified by robust viability evidence. This remains central to determining an acceptable way forward.

Affordable housing as a priority

- 3.44. More recent engagement has underlined the importance of delivering affordable housing, with officers and Members encouraging the applicant team to explore grant funding and alternative delivery mechanisms to secure provision alongside viability-tested employment uses.

4. Viability Context and Economic Statement

- 4.1. As demonstrated through the planning history, the deliverability of Site Allocation A10 is significantly constrained by a combination of site-specific issues and wider viability pressures. These factors have consistently prevented the Site from coming forward in the employment-led form envisaged by the allocation.
- 4.2. The principal constraints affecting delivery are as follows:
- **Employment land returns** – the policy allocation is employment-led, however commercial development on this site generates minimal land value relative to build costs, making the employment-led allocation inherently unviable without substantial cross-subsidy.
 - **Biodiversity Net Gain (BNG)** – Securing BNG is costly given limited off-site supply within Worthing, creating a potentially significant additional burden on delivery.
 - **Generic viability pressures** – In addition to these specific constraints, the scheme faces the same challenges as many brownfield sites: inflation in material and labour costs, rising finance costs, and competing demands from infrastructure, sustainability measures, and affordable housing requirements.
- 4.3. Taken together, these challenges mean that the allocation cannot be delivered in line with policy aspirations without a careful rebalancing of uses and robust viability testing.
- 4.4. Therefore, in line with Council Officer and Member feedback, several options have been considered and tested to form a robust viability justification to the proposed development. The application is supported by a Viability Assessment which assessed three development scenarios and these are discussed in further detail below:

Viability Assessment and Development Scenarios

- 4.5. Three principal development scenarios were tested, each reflecting different balances between residential development, affordable housing, and employment floorspace. These scenarios are summarised below.

Scenario 1: Employment-Led Scheme (59 Dwellings, 0% Affordable)

- 4.6. The first scenario tested an employment-led scheme broadly aligned with the original intent of the Site Allocation, comprising 59 market dwellings alongside approximately 6,875sqm of employment floorspace. This scenario assumed no affordable housing provision.
- 4.7. The viability appraisal demonstrates that this scenario generates a substantial viability deficit, in excess of £5.69 million, reflecting the fact that the employment floorspace generates a negative land value and requires extensive cross-subsidy from residential development which, at this scale, is wholly insufficient.
- 4.8. This scenario is therefore conclusively non-viable and undeliverable and cannot realistically be brought forward, notwithstanding its alignment with the headline policy aspiration.

Scenario 2: Reduced Employment Scheme (89 Dwellings, 0% Affordable)

- 4.9. A second scenario tested an increased level of residential development, comprising 89 market dwellings, alongside a reduced quantum of employment floorspace of approximately 5,020sqm. Again, no affordable housing provision was assumed.

- 4.10. While this scenario improves the viability position relative to the employment-led scheme, the appraisal still identifies a substantial viability deficit of approximately £2.92 million. The residual land value remains materially below the benchmark land value, confirming that even with significantly increased residential development and reduced employment provision, the scheme remains non-viable.
- 4.11. This scenario further demonstrates that large-scale employment provision on the Site is fundamentally incompatible with deliverability, even where affordable housing is entirely removed from the scheme.

Scenario 3: Residential-Led Mixed-Use Scheme (123 Dwellings, 30% Affordable)

- 4.12. The third scenario tested a residential-led mixed-use scheme comprising 123 dwellings, including 30% affordable housing following member feedback, alongside a reduced but meaningful quantum of employment floorspace of approximately 2,350sqm.
- 4.13. This scenario reflects the proposed development subject of the planning application. The appraisal demonstrates that, while this option significantly improves the viability position and enables the delivery of affordable housing and employment uses, it nonetheless still results in a residual land value below the benchmark land value, with a deficit of approximately £2.07 million.
- 4.14. Importantly, the appraisal confirms that this scenario only becomes deliverable because the applicant is prepared to proceed notwithstanding a materially reduced developer return, below standard industry benchmarks.
- 4.15. The testing therefore demonstrates that the proposed development represents the least unviable and most policy-responsive option available, and the only scenario capable of delivering:
- redevelopment of the Site;
 - affordable housing provision;
 - a viable quantum of employment floorspace; and
 - regeneration of a long-vacant, sustainably-located, brownfield allocation.

Implications for Policy A10 and Economic Justification

- 4.16. The viability evidence clearly demonstrates that the employment-led aspiration of Policy A10 cannot be delivered in practice, despite sustained efforts over several years to do so. Scenarios aligned most closely with the allocation's original intent result in severe viability deficits and are incapable of implementation.
- 4.17. Conversely, the proposed residential-led mixed-use scheme represents a pragmatic and evidence-based response to policy, securing economic and regeneration benefits that would otherwise not be realised, and avoiding the continued stagnation of a strategically located brownfield site.
- 4.18. In this context, the reduced quantum of employment floorspace must be weighed against the substantial benefits of deliverability, affordable housing provision, and the wider economic impacts of bringing the Site forward. National policy is clear that development should not be prevented where policy requirements cannot be viably met, and that viability is a material consideration in decision-making (Paragraph 59 of the NPPF). Paragraph 127 of the NPPF further supports this by stating that if a scheme has no reasonable prospect of coming forward as originally envisaged, the local planning authority should work with the applicant to find an alternative scheme where there is an unmet need in the area.

- 4.19. Accordingly, the proposed development is justified on economic and viability grounds and represents an appropriate, proportionate, and policy-compliant departure from the employment-led balance envisaged by Policy A10.
- 4.20. In this regard, the proposals have had full regard to the Sustainable Economy SPD, and, notwithstanding the absence of existing employment uses on the Site, the evidenced and justified reduction in allocated employment floorspace represents a policy-compliant response that prioritises deliverability, viability, and the regeneration of a long-vacant brownfield site. Accordingly, strict adherence to the employment quantum in Policy A10 would conflict with the Framework's emphasis on deliverability and effective use of land.

5. The Proposal

- 5.1. The proposed development at Land at Durrington Gasworks, Martlets Way, seeks a mixed-use development comprising 123 residential dwellings at 2,348sqm of commercial floorspace. The description of development is as follows:

Full Planning Application for mixed-use development comprising 123 dwellings and commercial units with associated parking, landscaping, open space and drainage.

- 5.2. The development seeks to provide 37 (30%) affordable dwellings onsite. The proposed housing and tenure mix is as follows:

Unit Type	Market Housing		Affordable		Total	
	No.	%	No.	%	No.	%
1-Bedroom Flats	-		10		10	16%
1-Bedroom Maisonette	-		10		10	
2-Bedroom Flat	-		14		14	48%
2-Bedroom House	42		3		45	
3-Bedroom House	38		-		38	31%
4-Bedroom House	6		-		6	5%
Total	86	70%	37	30%	123	100%

- 5.3. The proposed site layout is shown below in Figure 9.



Figure 9 - Proposed Site Layout

Commercial Development

- 5.4. The western portion of the site at Martlets Way will comprise 2,348sqm of commercial space across one unit, with 1,400sqm of at ground floor level and 948sqm at first floor (mezzanine) level.
- 5.5. The commercial area will be accessed from Martlets Way at the south-western corner of the Site. An internal access road will run around to the eastern side of the commercial unit.

- 5.6. 70 car parking spaces will be provided across the commercial area, with 31 spaces arranged in three rows to the south of the units, and two rows of parking along the eastern site of the commercial building comprising 39 spaces.
- 5.7. An existing easement and access is maintained to the existing off-site pumping station south of the site.
- 5.8. An area of landscaped amenity space is proposed to the northwest corner of the commercial unit.
- 5.9. The commercial and residential parcels will be separated by a boundary treatment, with an attenuation basin located on the residential side of the boundary fence.
- 5.10. Existing trees along the northern boundary of the commercial area will be retained, with additional planting proposed to reinforce and enhance the boundary with Holm Oak Business Park to the north and residential dwellings to the south.
- 5.11. A cycle store is located to the northeast corner, and a refuse store to the southeast corner.

Residential Development

- 5.12. The proposed development comprises 123 residential dwellings across the SGN, The Nib, and Martlets Way parcels. Vehicular access will be provided from the east via Sword Street, within the Elizabeth Square Phase 1 development. Two access points are proposed along the eastern boundary, comprising an internal loop road to the north and a through-road connection to the Martlets Way parcel to the south.
- 5.13. One three-storey apartment building is proposed along the northern boundary of the SGN parcel. A series of terraced dwellings are proposed to the east of this block, orientated with rear gardens backing onto the Brighton–Littlehampton railway line. Acoustic fencing is proposed along this boundary between the rear gardens and railway line.
- 5.14. Two further apartment buildings are proposed within the centre of the Martlets Way parcel, positioned adjacent to the area of open space and next to the commercial area.
- 5.15. An area of public open space is proposed centrally within the site, adjacent to the existing tree belt separating the Martlets Way and SGN parcels. This area will incorporate an attenuation basin and a Local Area for Play (LAP), following pre-app advice.
- 5.16. Existing trees along the southern, western, and eastern boundaries of the SGN parcel and the Nib will be retained, except where removal is required to facilitate site access. All existing trees along the northern boundary of the Martlets Way parcel will be retained.
- 5.17. Existing non-native trees within the northern part of the SGN parcel will be removed to facilitate access and development within this area.
- 5.18. Car parking provision is proposed as follows:
 - Flats: 1 space per unit
 - 2-bedroom houses: 1.5 spaces per unit
 - 3- and 4-bedroom houses: 2 spaces per unit
 - Visitor parking: 20% of total dwellings
- 5.19. This results in the provision of 190 residential parking spaces and 25 visitor parking spaces, giving a total of 215 parking spaces across the site.

- 5.20. A gas governor is located to the east of the site, with an electricity substation located to the south.
- 5.21. The drainage strategy for the site includes a series of attenuation basins, together with below-ground storage located beneath the carparking areas.
- 5.22. All dwellings will be constructed to meet Building Regulations M4(2) standards, with the exception of some of the flat block units which meet M4(2) adaptable standards within the units but do not include a lift shaft. One dwelling within Flat Block A will be constructed to M4(3) wheelchair-user standards.
- 5.23. The development includes new tree planting, on-site landscaping, and a network of pedestrian routes throughout the site.
- 5.24. An acoustic fence is also proposed along the northern boundary of the Martlets Way site to mitigate noise impacts from the commercial area at Holm Oak Business Park and the proposed residential units.
- 5.25. Potential pedestrian links are being explored connecting to Juno Close and Barrington Road, subject to third party agreement.

6. Policy Overview

6.1. Introduction

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

6.2. National Planning Policy Framework (NPPF)

- 6.2.1. Updated in December 2024, the following are considered the most relevant sections of the Framework applicable to the proposed development:

Chapter 2 – Achieving Sustainable Development
Chapter 5 – Delivering a Sufficient Supply of Homes
Chapter 6 – Building a strong, competitive economy
Chapter 7 – Ensuring the Vitality of Town Centres
Chapter 8 – Promoting Healthy and Safe Communities
Chapter 9 – Promoting Sustainable Transport
Chapter 11 – Making Effective Use of Land
Chapter 12 – Achieving Well Designed Places
Chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change
Chapter 15 – Conserving and enhancing the natural environment
Chapter 16 – Conserving and Enhancing the Historic Environment

6.3. National Planning Practice Guidance (NPPG)

- 6.3.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposed redevelopment is seen to be fully compliant with it.

6.4. Worthing Local Plan (2023)

- 6.4.1. The Worthing Local Plan (WLP) was formally adopted at Full Council on 28 March 2023 and supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 6.4.2. The WLP sets out the strategic development and land-use priorities for Worthing (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within that area will be made. The main policies of relevance are:

SP1 – Presumption in favour of Sustainable Development
SP2 – Climate Change
SP3 – Healthy Communities
SS1 – Spatial Strategy

SS2 – Site Allocations
 A10 – Martlets Way
 DM1 – Housing Mix
 DM2 – Density
 DM3 – Affordable Housing
 DM5 – Quality of the Built Environment
 DM6 – Public Realm
 DM7 – Open Space, Recreation and Leisure
 DM8 – Planning for Sustainable Communities / Community Facilities
 DM9 – Delivering Infrastructure
 DM10 – Economic Growth and Skills
 DM11 – Protecting and Enhancing Employment Sites
 DM15 – Sustainable Transport & Active Travel
 DM16 – Sustainable Design
 DM17 – Energy
 DM18 – Biodiversity
 DM19 – Green Infrastructure
 DM20 – Flood Risk and Sustainable Drainage
 DM21 – Water Quality and Sustainable Water Use
 DM22 – Pollution

6.4.3. For completeness the wording of Policy A10 Site Allocation is outlined below:

Development Requirements - any future development proposals should:

- a) deliver a residential and employment scheme comprising of a minimum of 28 residential units and approximately 10,000 sqm employment;*
- b) ensure that the development does not have an unacceptable impact on the amenity of neighbouring residents. Provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;*
- c) promote a travel plan to improve the accessibility and sustainability of the site;*
- d) ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;*
- e) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Protect mature Ilex oak trees that separate the former gas holder site from the former sewage treatment works (subject to appropriate assessment work). New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network;*
- f) ensure that the layout and access arrangements for any development does not constrain or prevent the ability for development to come forward elsewhere within the site as a whole;*
- g) provide an element of residential development accessed from the east (HMRC A8) but only if it can facilitate the delivery of employment floorspace at Martlets Way accessed from the west and provide for the former gasholder site to be brought forward;*
- h) a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that*

any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk;

i) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;

j) provide an appropriate level of contribution towards highway safety improvements at the A259 Goring Way / Goring Street junction and highway capacity improvements at the A259 / A2032 Goring Crossways junction.

6.5. Supplementary Planning Documents (SPDs)

6.5.1. Other policy documents which are material to this application include:

Sustainable Economy SPD – February 2012

Guide to Residential Development SPD – November 2013

Space Standards SPD – February 2012

Developer Contributions SPD – July 2015

Worthing Planning and Climate Change Checklist – December 2023

7. Planning Appraisal

7.1. Introduction

- 7.1.1. The principal issues in relation to this development are as follows:

Principle of Development
Housing Need and Affordable Housing
Housing Mix
Design Form and Appearance
Transport and Highways
Flood Risk and Drainage
Landscape
Arboriculture
Biodiversity and Ecology
Residential Amenity
Noise Impact
Air Quality
Sustainability
Lighting
Land Contamination
Heritage and Archaeology

7.2. Principle of Development

- 7.2.1. The application site forms part of Site Allocation A10 (Martlets Way) within the Adopted Worthing Local Plan (2023). As an allocated site, the principle of redevelopment in this location is firmly established. The allocation identifies the land for a mix of employment and residential uses, recognising its role as a key brownfield regeneration opportunity within the Built-Up Area Boundary.
- 7.2.2. We acknowledge, however, that the current proposals depart from the intentions of the allocation by delivering a significantly reduced level of employment floorspace. As set out throughout this submission, detailed viability testing has demonstrated that the full quantum of employment land cannot be viably delivered alongside residential uses. On this basis, the proposed layout presents a balanced approach that ensures the scheme remains policy-compliant, deliverable, and capable of unlocking this complex brownfield site.
- 7.2.3. The principle of the approach is considered acceptable for several reasons. The redevelopment will bring forward a long-standing brownfield site in line with paragraphs 124 of the NPPF, which promote the reuse of land and optimisation of capacity in sustainable locations. It will also respond directly to Worthing's acute housing need by delivering a significant number of new homes, including affordable housing, a matter that has previously received support from Members.
- 7.2.4. Importantly, the Martlets Way parcel has been actively marketed for commercial use, but without uptake, demonstrating that market demand is not currently present to deliver the scale of employment provision originally envisaged. Detailed marketing evidence is submitted in support of this application.
- 7.2.5. In this context, paragraph 127 of the National Planning Policy Framework is directly relevant. Paragraph 127 states:

Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

(b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

- 7.2.6. As demonstrated through the submitted marketing evidence and detailed viability assessment, there is **no reasonable prospect** of the Site coming forward in the employment-led form envisaged by Allocation A10 within the plan period.
- 7.2.7. The absence of market demand for large-scale commercial development, combined with significant abnormal costs and viability constraints, means that the allocation's original employment quantum cannot be delivered in practice. In these circumstances, paragraph 127 of the NPPF provides clear support for a flexible, evidence-led approach to decision-making.
- 7.2.8. The proposed residential-led mixed-use redevelopment responds positively to this national policy direction. It enables the regeneration of a long-standing brownfield site and makes a substantial contribution towards meeting Worthing's acute housing needs, including affordable housing provision, while retaining an appropriate and viable level of commercial floorspace.
- 7.2.9. When considered alongside the Site's highly sustainable location, the proposals represent a logical and policy-supported evolution of the allocation. On this basis, the principle of the proposed development is firmly supported by both national and local planning policy.

7.3. Housing Need and Affordable Housing

- 7.3.1. The Worthing Local Plan (2023) identifies a housing requirement of 3,672 dwellings over the plan period (equating to 230 dwellings per annum) under Policy SS2, against an objectively assessed need of approximately 885 dwellings per annum. This substantial shortfall underlines the importance of maximising housing delivery on allocated and previously developed land within sustainable locations.
- 7.3.2. Site Allocation A10 (Martlets Way) identifies a minimum requirement of 28 dwellings. The proposed delivery of 123 dwellings therefore represents a significant uplift over the allocation's minimum expectation and makes an important contribution to housing delivery within the Borough, particularly given the Site's sustainable location within the Built-up Area Boundary.
- 7.3.3. The proposed development also responds directly to the Borough's acute affordable housing needs. In accordance with Policy DM3 (Affordable Housing), the scheme will deliver 37 affordable homes, equating to 30% on-site affordable housing provision. This reflects the policy requirement for previously developed land and accords with the Council's Affordable Housing Supplementary Planning Document.
- 7.3.4. The need for affordable housing in Worthing is both acute and increasing. As of September 2025, the Council's housing register comprised 2,244 households, representing 3,382 adults and 1,583 children. Demand is particularly pronounced for smaller homes, with identified need for 1,164 one-bed and 588 two-bed properties, alongside an ongoing requirement for family-sized accommodation.
- 7.3.5. This pressure is further evidenced by the Council's growing reliance on temporary accommodation. Expenditure on temporary accommodation has risen sharply from approximately £4.25 million in 2022/23 to over £7 million in 2024/25, reflecting both rising demand and constrained housing supply. These trends underline the urgent need to secure additional affordable housing through deliverable development proposals.
- 7.3.6. In this context, it is notable that Worthing Borough Council has delivered very limited new affordable homes in recent years, with only 17 affordable homes delivered across the

Borough since 2024 ([Live tables on affordable housing supply - GOV.UK](#)). The delivery of 37 affordable homes as part a single proposed development therefore represents a timely and significant contribution towards meeting identified affordable housing needs within the Borough.

- 7.3.7. By substantially exceeding the allocation's minimum housing requirement and delivering policy-compliant affordable housing on a previously developed, sustainably located site, the scheme responds positively to both local and national policy objectives and makes effective use of land within the Built-up Area Boundary.
- 7.3.8. The proposals have been shaped by detailed engagement with Officers and Members, particularly in respect of the appropriate balance between employment and affordable housing delivery.
- 7.3.9. When considered alongside the robust viability evidence, the affordable housing provision proposed is fully justified and should be afforded significant weight in the determination of the application, given its contribution to addressing acute housing need, reducing reliance on temporary accommodation, and supporting the effective delivery of the Local Plan strategy.

7.4. Housing Mix

- 7.4.1. Policy DM1 requires all new development to consider the most up-to-date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site. The most up-to-date Strategic Housing Market Assessment (SHMA) dated March 2020, outlines the following mix of dwellings across any future development:

- 1-Bed Properties: 5-15%
- 2-Bed Properties: 40-45%
- 3-Bed Properties: 35-40%
- 4+- Bed Properties: 10-20%

- 7.4.2. The below table sets out the proposed housing mix for the development

Unit Type	Market Housing		Affordable		Total	
	No.	%	No.	%	No.	%
1-Bedroom Flats	-		10		10	16%
1-Bedroom Maisonette	-		10		10	
2-Bedroom Flat	-		14		14	48%
2-Bedroom House	42		3		45	
3-Bedroom House	38		-		38	31%
4-Bedroom House	6		-		6	5%
Total	86	70%	37	30%	123	100%

- 7.4.3. As demonstrated, the proposed housing mix broadly accords with the evidence set out within the March 2020 Strategic Housing Market Assessment. The scheme provides a slightly higher proportion of one- and two-bedroom units and a reduced proportion of four-bedroom dwellings. This reflects the site's sustainable and accessible location, its proximity to services, facilities, and public transport, and the established pattern whereby larger family dwellings are more commonly located toward the edge of settlements.

- 7.4.4. The proposed mix therefore responds appropriately to identified housing needs while remaining consistent with the character and function of this part of the settlement, while also reflecting needs for smaller affordable units as discussed above.

7.5. Design, Form and Appearance

- 7.5.1. The design, form, and layout of the proposed development have been informed by the site's urban context, its mixed-use allocation, and the pattern of development within the surrounding area. In particular, the proposals have been shaped by the adjacent Elizabeth Square Phase 1 development to the east, which is currently under construction by Bellway Homes and forms Phase 1 of the wider regeneration of this area.
- 7.5.2. Elizabeth Square Phase 1 has directly informed the density, scale, layout structure, and housing typologies proposed as part of this application. The scheme reflects a consistent approach to street hierarchy, block structure, built form, and dwelling types, ensuring continuity and a coherent relationship between the two phases of development.
- 7.5.3. The layout establishes a clear distinction between the commercial development fronting Martlets Way and the residential areas to the east and north, reflecting the established land-use pattern promoted by Site Allocation A10. Residential development is arranged around a defined street network and areas of public open space, with building heights and typologies varying across the site to reflect changes in character and density.
- 7.5.4. The proposals accord with Policies DM2 (Density) and DM5 (Quality of the Built Environment) of the Worthing Local Plan (2023), ensuring that development makes efficient use of land while responding appropriately to its context and surroundings. The retention of existing landscape features, alongside new planting and green infrastructure, forms an integral part of the site structure and layout.
- 7.5.5. Detailed consideration of design principles, layout evolution, scale, appearance, access arrangements, landscaping, and inclusive design is provided within the accompanying Design and Access Statement, which should be read alongside this Planning Statement.

7.6. Transport and Highways

- 7.6.1. The application is supported by a Transport Assessment, prepared following pre-application engagement with West Sussex County Council as Local Highway Authority. The Assessment confirms that the Site is highly accessible by sustainable modes, being within walking distance of Durrington-on-Sea railway station, bus services, and local facilities, and is therefore well suited to residential and mixed-use development in accordance with Policy DM15.
- 7.6.2. The access strategy has been deliberately designed to separate land uses and minimise highway impacts. Residential vehicular access is taken exclusively from the east via Sword Street within the consented Elizabeth Square Phase 1 development, while commercial access and servicing are focused solely to the west via Martlets Way. This approach ensures that commercial traffic is directed away from existing residential streets and accords with the movement principles envisaged by Site Allocation A10.
- 7.6.3. Car and cycle parking provision is compliant with West Sussex County Council standards and reflects the Site's sustainable location. A total of 215 residential parking spaces are provided, including visitor parking, alongside 70 spaces to serve the commercial units. Cycle parking is provided for both residential and commercial uses, and the scheme incorporates comprehensive electric vehicle charging provision. A Framework Travel Plan accompanies the application, promoting sustainable travel choices in accordance with Policy DM15 and Site Allocation A10(c).

- 7.6.4. The Transport Assessment concludes that the proposed development would generate modest levels of traffic, with no severe residual cumulative impacts on the surrounding highway network. Junction capacity testing, agreed with the Local Highway Authority, demonstrates that key junctions would continue to operate within capacity in future year scenarios.
- 7.6.5. Overall, the Transport Assessment confirms that the development provides safe and suitable access for all users, promotes sustainable travel, and would not give rise to any unacceptable transport or highways impacts. Transport considerations therefore fully support the proposed development in planning terms.

7.7. Flood Risk and Drainage

- 7.7.1. The application is supported by a site-specific Flood Risk Assessment and Drainage Strategy, prepared in accordance with the National Planning Policy Framework, Planning Practice Guidance, and Policies DM9 (Delivering Infrastructure), DM20 (Flood Risk and Sustainable Drainage) and DM21 (Water Quality and Sustainable Water Use) of the Worthing Local Plan (2023). The Assessment also responds directly to Site Allocation A10(h), which requires consideration of all sources of flood risk, climate change impacts, and demonstration that development will be safe for its lifetime without increasing flood risk elsewhere.
- 7.7.2. The site is located entirely within Flood Zone 1 and is therefore at low risk of fluvial and tidal flooding. The Flood Risk Assessment confirms that flood risk from all other sources, including surface water, groundwater, sewers, and artificial sources, is also low. While there are areas of localised surface water risk associated with existing low points and historic site features, these are addressed through the proposed site levels, layout, and drainage strategy. As a result, the development is not expected to be at risk of flooding during its lifetime, including allowing for climate change, and the Sequential and Exception Tests are not required.
- 7.7.3. The drainage strategy has been designed in accordance with the latest National Standards for Sustainable Drainage Systems (June 2025) and CIRIA guidance, adopting a comprehensive SuDS-led approach in line with Policy DM20. Surface water runoff will be managed on site through a combination of attenuation basins, swales, tree pits, permeable paving, and below-ground attenuation, before being discharged to the existing surface water sewer network at a restricted greenfield rate. The system has been designed to accommodate storm events up to and including the 1 in 100-year event plus a 45% allowance for climate change, ensuring no increase in flood risk on or off site.
- 7.7.4. Exceedance flows will be safely managed through site levels and routing towards landscaped areas and attenuation features, away from buildings, ensuring that residual risks can be safely accommodated. The strategy also delivers water quality, amenity, and biodiversity benefits through the integration of SuDS within the site's green infrastructure, consistent with Policies DM20 and DM21.
- 7.7.5. Foul drainage will connect to the existing public foul sewer network, with confirmation from Southern Water that adequate capacity exists to accommodate the proposed development. Appropriate management and maintenance arrangements for the drainage infrastructure will be secured to ensure its effective operation over the lifetime of the development, in accordance with Policy DM9.
- 7.7.6. Overall, the Flood Risk Assessment demonstrates that the proposed development will be safe for its lifetime, will not increase flood risk elsewhere, and will, where possible, reduce existing surface water flood risk through the redevelopment of this brownfield site. Flood risk and drainage considerations therefore fully support the proposed development in planning terms.

7.8. Landscape

- 7.8.1. In accordance with Policy DM19 (Green Infrastructure) of the Worthing Local Plan, the design integrates natural features on site, retaining key boundary landscaping, including the policy-specified row of mature Ilex oak trees. These trees, which separate the former gas holder site from the Martlets Way parcel, are integral to the landscape's character and will be fully protected except where minor intervention is necessary for site access. The existing mature vegetation and boundary treatments will be safeguarded and enhanced as part of the landscape strategy, ensuring minimal disruption to the site's natural assets.
- 7.8.2. The development layout seeks to blend with the natural contours of the site, minimising cut and fill to preserve the topography. New green infrastructure is introduced across the site, with replacement tree planting and the incorporation of SuDS features that further strengthen the site's ecological connectivity and contribute to the wider green infrastructure network in line with Policies DM18 and DM19.
- 7.8.3. The development will provide well-designed public and private open spaces, ensuring that both residential and commercial elements benefit from high-quality landscaping that enhances the built environment and supports biodiversity net gain. The provision of landscape buffers along sensitive boundaries, combined with a robust tree planting scheme, will mitigate any potential impacts on the surrounding environment, meeting both local and national policy requirements.
- 7.8.4. Overall, the proposed landscape strategy demonstrates a strong commitment to protecting and enhancing the natural environment while creating a development that is well-integrated into the local landscape. This approach aligns with the objectives of the Worthing Local Plan, particularly Policies DM18 (Biodiversity) and DM19 (Green Infrastructure), ensuring that the development positively contributes to the site's regeneration and to the Borough's green infrastructure network.

7.9. Arboriculture

- 7.9.1. The application is supported by a Tree Survey and Arboricultural Impact Assessment. The proposed development has been informed by this assessment and seeks to retain and integrate existing trees wherever practicable, in accordance with Policies DM18, DM19 and Site Allocation A10(e) of the Worthing Local Plan (2023).
- 7.9.2. The site contains a number of tree groups and boundary features of varying quality. The majority of boundary trees are retained, including the important and policy-specified row of mature holm oak (Ilex oak) trees separating the former gas holder site from the Martlets Way parcel, which are expressly identified for protection within Site Allocation A10(e). These trees are retained in full, except where limited and necessary removals are required to facilitate site access, consistent with the allocation and subject to arboricultural assessment.
- 7.9.3. It is acknowledged that the proposed development necessitates the removal of a row of non-native trees within the northern part of the SGN parcel, together with a small number of trees at the eastern access points. As confirmed by the Arboricultural Impact Assessment, these trees are either of low or moderate quality, include species such as Monterey cypress, and are not protected by Tree Preservation Orders. Their removal is required to enable the effective and efficient redevelopment of the site and is considered acceptable in arboricultural and planning terms when weighed against the wider benefits of the scheme.
- 7.9.4. An acoustic fence is proposed along the northern boundary of the Martlets Way parcel, parts of which lie within the root protection areas of retained trees. The Arboricultural Impact Assessment confirms that this can be safely accommodated using hand-dug post foundations and appropriate construction techniques, avoiding harm to retained trees and ensuring compliance with BS5837 guidance.

- 7.9.5. The development proposals include new and replacement tree planting across the site, integrated within streets, open spaces, SuDS features, and landscaped areas. This will enhance the site's green infrastructure network, diversify species composition, and deliver long-term landscape, amenity, biodiversity, and climate resilience benefits, consistent with Policies DM18 and DM19.
- 7.9.6. Overall, while some tree loss is unavoidable, the proposals demonstrate a balanced and policy-compliant approach, prioritising the retention of high-value boundary trees, safeguarding important tree groups identified in the Site Allocation, and delivering enhanced green infrastructure and replacement planting. Arboricultural considerations therefore do not present any impediment to the proposed development and weigh positively in the overall planning balance.

7.10. Biodiversity and Ecology

- 7.10.1. The application is supported by an Ecological Impact Assessment (EclA), which identifies the existing ecological value of the site and sets out appropriate mitigation and enhancement measures to ensure that biodiversity interests are suitably protected and managed during construction and operation. The EclA confirms that, subject to the recommended measures, the proposed development would not result in any unacceptable ecological impacts. Further detail is provided within the submitted Ecological Impact Assessment.
- 7.10.2. A Biodiversity Net Gain (BNG) Assessment accompanies the application and demonstrates that the proposals are capable of delivering the statutory minimum 10% Biodiversity Net Gain, in accordance with the Environment Act 2021 and Policy DM18 (Biodiversity) of the Worthing Local Plan (2023). Biodiversity net gain will be achieved through a combination of on-site enhancements and, where necessary, off-site provision.
- 7.10.3. The proposals respond positively to Site Allocation A10(e) by retaining and protecting key biodiversity assets, including the mature Ilex oak tree belt separating the former gas holder site from the former sewage treatment works, except where limited intervention is required to facilitate access and subject to appropriate assessment. New green infrastructure and landscape planting are proposed across the site, providing opportunities to strengthen ecological connectivity and contribute to the wider Borough-wide green infrastructure network, in line with Policies DM18 and DM19 (Green Infrastructure).

7.11. Residential Amenity

- 7.11.1. The proposed development has been carefully designed to ensure that it does not result in any unacceptable impact on the amenity of either existing or future residents, in accordance with Policies DM5 (Quality of the Built Environment) and the specific requirements of Site Allocation A10(b).
- 7.11.2. In respect of existing neighbouring residents, the development is well contained within the site and benefits from substantial separation from surrounding residential areas. Existing residential boundaries are predominantly screened by retained tree belts, mature vegetation, and landscape buffers, which are largely retained and reinforced as part of the proposals. The taller three-storey apartment buildings are located away from existing dwellings, positioned adjacent to the Brighton-Littlehampton railway line to the north and alongside the business park within the Martlets Way parcel. As a result of the site layout, building orientation, and separation distances, the proposals would not give rise to unacceptable impacts in terms of overlooking, loss of privacy, or daylight and sunlight.
- 7.11.3. The scale, height, and massing of development at the site edges have been carefully considered to respect the character and established building lines of adjoining areas, ensuring a suitable relationship with neighbouring properties in accordance with Site Allocation A10(b).

- 7.11.4. For future residents, the proposed dwellings provide a high standard of residential amenity. All homes meet Nationally Described Space Standards, with appropriate back-to-back distances and private amenity space provided throughout the scheme. Buildings are orientated to overlook streets and areas of public open space where possible, promoting natural surveillance and a strong sense of place. Clear physical separation is maintained between the commercial and residential elements of the development to avoid conflict between uses.
- 7.11.5. Potential noise impacts arising from the adjacent railway line and business park are appropriately mitigated through the site layout and the provision of acoustic fencing and boundary treatments, ensuring that future residents will benefit from a satisfactory living environment.
- 7.11.6. Overall, the proposals achieve a high quality of residential amenity for both existing and future occupants and fully comply with the amenity requirements of the Worthing Local Plan and Site Allocation A10(b).

7.12. Noise Impact

- 7.12.1. A Noise Assessment has been submitted in support of the application to assess the potential effects of existing noise sources on the proposed development, including road traffic, railway activity, and nearby commercial uses.
- 7.12.2. The Assessment confirms that, while the site is influenced by external noise sources, appropriate mitigation measures can be secured to ensure that acceptable internal and external noise standards are achieved for future occupants. These measures include targeted façade design, glazing and ventilation specifications, and the provision of acoustic fencing along sensitive site boundaries, as informed by the detailed assessment.
- 7.12.3. Construction-related noise impacts are identified as temporary and short term in nature and can be satisfactorily managed through standard best practice measures, secured via a Construction Management Plan.
- 7.12.4. Overall, the Noise Assessment concludes that the proposed development can be delivered without resulting in unacceptable noise impacts and will provide a suitable living environment for future residents. The proposals therefore accord with Policies DM22 (Pollution) and DM16 (Sustainable Design) of the Worthing Local Plan (2023), and noise considerations do not represent a constraint to the development.

7.13. Air Quality

- 7.13.1. An Air Quality Assessment has been submitted in support of the application. The assessment confirms that the Site is located outside the Worthing Air Quality Management Area and that existing and future baseline pollutant concentrations are below national air quality objectives.
- 7.13.2. The assessment concludes that construction-related dust impacts can be adequately controlled through standard mitigation measures secured via a Construction Management Plan, with no significant residual effects. In operational terms, the development would not result in unacceptable impacts from traffic, railway activity, or on-site emissions, nor would future residents be exposed to poor air quality conditions.
- 7.13.3. Overall, the proposals accord with Policy DM22 (Pollution) of the Worthing Local Plan (2023) and relevant national planning policy. Air quality does not represent a constraint to the proposed development.

7.14. Sustainability

- 7.14.1. An Energy and Sustainability Statement has been submitted in support of the application, demonstrating that the proposed development has been designed to achieve a high standard of sustainable design and construction, in accordance with national policy and the Worthing Local Plan (2023).
- 7.14.2. The proposals adopt a fabric-first approach, with all residential dwellings designed to be highly energy efficient, zero-carbon ready, and future-proofed to respond to the forthcoming Future Homes Standard. The development will not connect to the gas network, with space and water heating instead provided via air source heat pumps, supported by on-site solar photovoltaic panels. This approach accords with Policies SP2 (Climate Change), DM16 (Sustainable Design) and DM17 (Energy).
- 7.14.3. Water efficiency is embedded within the scheme, with all dwellings capable of achieving a water consumption rate of no more than 110 litres per person per day, in line with Policy DM21 (Water Quality and Sustainable Water Use) and Building Regulations. These measures are complemented by the wider landscape and SuDS strategy, which responds positively to climate change adaptation.
- 7.14.4. The proposed commercial element will be designed to achieve BREEAM 'Very Good'. A BREEAM Pre-Assessment accompanies the application, confirming that this rating is achievable and can be secured through condition, in accordance with Policy DM16.
- 7.14.5. The scheme also supports sustainable living and movement through its accessible location, provision of electric vehicle charging infrastructure in line with Approved Document S, secure cycle parking, and full fibre digital connectivity, consistent with Policies DM14 (Digital Infrastructure) and DM15 (Sustainable Transport and Active Travel).
- 7.14.6. Overall, the proposals deliver a robust, integrated, and policy-compliant sustainability strategy, creating an energy-efficient, low-carbon, and climate-resilient development that fully aligns with the objectives of the Worthing Local Plan and national planning policy.

7.15. Lighting Assessment

- 7.15.1. The proposed development will incorporate appropriate external lighting to ensure safety, accessibility, and legibility across the site, while avoiding adverse impacts on residential amenity, biodiversity, and the wider environment in accordance with Worthing Local Plan Policies.
- 7.15.2. The residential streets within the development will be constructed to an adoptable standard and will therefore be provided with adoptable street lighting, designed in accordance with the requirements of the Local Highway Authority. This will ensure safe movement for pedestrians and vehicles and will be secured through the detailed design process.
- 7.15.3. External lighting within the commercial area will be designed to provide appropriate levels of illumination for operational and safety purposes, while being carefully controlled to minimise light spill, glare, and impacts on nearby sensitive receptors. Lighting will be designed in accordance with relevant guidance, including the Institution of Lighting Professionals' standards.
- 7.15.4. The detailed design, specification, and installation of all external lighting will be secured through a suitably worded planning condition, requiring the submission and approval of a comprehensive lighting scheme prior to occupation. This approach will ensure that lighting impacts are appropriately assessed and managed and that the development accords fully with Local Plan policy and national guidance.

7.16. Land Contamination

- 7.16.1. A Phase 1 Desk Study and Preliminary Risk Assessment has been submitted in support of the application, having regard to the Site's historical uses, including former gasholders associated with gas infrastructure and areas previously used for sewage treatment works. These historic uses have the potential to give rise to land contamination and have therefore been appropriately assessed.
- 7.16.2. While the Site's former industrial and utility-related uses are acknowledged, the assessment concludes that no unacceptable risks have been identified that would preclude redevelopment for the proposed mixed-use development.
- 7.16.3. The Desk Study confirms that any potential risks to future site users, controlled waters, or the wider environment can be appropriately managed through a proportionate and phased programme of further investigation and, where necessary, remediation, in accordance with Policy DM22 (Pollution) of the Worthing Local Plan (2023).
- 7.16.4. Subject to the imposition of appropriately worded planning conditions, the submitted evidence demonstrates that land contamination issues can be satisfactorily addressed and that remediation can be undertaken where required without constraining the proposed development. The proposals therefore fully comply with Site Allocation A10(d) and relevant Local Plan policy, and land contamination does not represent a constraint to the safe and effective redevelopment of the Site.

7.17. Heritage and Archaeology

- 7.17.1. The proposals are not anticipated to have any impact on local heritage assets, with no listed buildings or conservation areas in the immediate vicinity. As such the development is not considered to cause any impact or harm to designated heritage assets.
- 7.17.2. An Archaeological Desk Based Assessment has been prepared by RPS in support of the application. This identifies that the proposals do not impact on any designated archaeological sites or areas of archaeological importance, with low potential for archaeological remains given the intensive recent use as a gasholder and sewage treatment works. The report finds the development fully compliant with current legislation.

8. Conclusion

- 8.1. This Statement has been produced by ECE Planning, on behalf of the applicant, Bellway Homes, in support of a Full Planning Application for the following development relating to Land at Durrington Gasworks, Martlets Way, Goring (the Site). The description of development is as follows:

Full Planning Application for mixed-use development comprising 123 dwellings and commercial floorspace with associated parking, landscaping, open space and drainage.

- 8.2. The Statement demonstrates that the proposed development represents a sustainable, deliverable, and evidence-led redevelopment of a long-vacant brownfield site within the Built-up Area Boundary of Worthing. The principle of redevelopment is firmly established through Site Allocation A10 of the Worthing Local Plan (2023).
- 8.3. While the proposals depart from the employment-led quantum originally envisaged by Site Allocation A10, extensive viability, market, and technical evidence confirms that the delivery of large-scale employment floorspace is not achievable in practice. In response, the proposed development provides a residential-led mixed-use scheme, retaining a reduced but meaningful level of commercial floorspace, which enables the Site to come forward in a deliverable form. This approach is consistent with paragraph 127 of the National Planning Policy Framework, which supports flexibility where allocated uses cannot be viably delivered.
- 8.4. The development will deliver 123 new homes alongside 2,348 sqm of commercial floorspace, including 37 affordable dwellings (30%). This balanced mix of uses secures both housing delivery and ongoing economic activity on the Site, while making a significant contribution towards addressing Worthing's acute housing and affordable housing needs. The proposals significantly exceed the allocation's minimum housing requirement and ensure the effective reuse of previously developed land in a highly sustainable location.
- 8.5. The proposals have been informed by sustained engagement with Worthing Borough Council and are supported by a comprehensive suite of technical assessments. These confirm that the development can be delivered without giving rise to unacceptable impacts in respect of transport and highways, flood risk and drainage, residential amenity, noise, air quality, ecology, arboriculture, land contamination, or infrastructure capacity. Where necessary, matters can be appropriately addressed through suitably worded planning conditions.
- 8.6. The scheme delivers high-quality design, an appropriate housing mix, retained and enhanced green infrastructure, sustainable drainage, and a robust energy and sustainability strategy. A viable level of commercial floorspace is retained and appropriately located, ensuring a clear and functional separation of uses and responding positively to the objectives of Policy A10.
- 8.7. Overall, the proposed development represents an effective use of land, secures the regeneration of a long-standing brownfield allocation, and delivers substantial social, economic, and environmental benefits. When assessed against the Development Plan as a whole and all other material considerations, the proposals are fully justified and planning permission should be granted.

