



# THE WORTHING SOCIETY

18 Mill Road  
Angmering  
BN16 4HT

6<sup>th</sup> January 2015

The Head of Planning, Regeneration and Well-being  
Portland House, Worthing.

Dear Sir,

## **Aquarena Redevelopment**

### **Application Reference: AWDM/1636/14**

The Worthing Society is opposed to this application from Roffey Homes Ltd, judging it an inappropriate overdevelopment of this important public location.

Attached is a document containing our comments on the application. These comments indicate where the application conflicts with local planning policies, particularly those policies contained in the Core Strategy, and the Supplementary Planning Documents on Tall Buildings Guidelines and Residential Development. The density, scale and mass of the proposed buildings are excessive and the twenty-one storey tower block of flats would be an eyesore.

It is difficult to accept that there has not been covert encouragement by the Worthing Borough Council to Roffey Homes for this overwhelming and controversial proposal. On [page 12 of the contract](#) between the Council (the Seller) and Roffey (the Buyer) dated 18<sup>th</sup> October 2013, it states:

*“4.2 In relation to the proposed Planning Application, the Buyer, in its sole discretion but acting reasonably and professionally, will seek to maximise the number of Apartments within the Development.”*

We presume the more Roffey are allowed to put on the site the more Roffey pay.

Choosing a density of over 200 dwellings per hectare instead of 100 dph for inner city development skews the whole design process.

It is entirely possible using the density of 100dph to design a modern sustainable building which would enhance the site and setting and be an asset to the town.

This proposal may “regenerate” the Aquarena site but will “degenerate” the environs of the site. It fails to enhance or make a contribution to local character or recognise the importance of the Farncombe Road Conservation Area, New Parade, listed Grade II\* Beach House and the “spirit of place” of East Worthing. It downgrades the Heritage Assets which are vital to sustain Worthing’s character.

**The Worthing Society is strongly opposed to this application and requests that it be refused.**

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David Sumner  
Chairman of The Worthing Society

Enclosed: The Comments by the Worthing Society (See next page)

# **Planning Application AWDM/1636/14**

## **The Aquarena Redevelopment**

### **Comments by the Worthing Society**

The contract of October 2013 between Worthing Borough Council and Roffey Homes Ltd for the sale of the Aquarena site reveals that Worthing and Roffey have already agreed the form and content of this planning application; and that Roffey has sought to maximise the number of apartments provided by the development. The public consultation on this planning application therefore appears to be a charade, because Worthing has already approved the terms of the application. Worthing's motivation is clear: it wishes to ensure the sale of the site for the maximum achievable price, to provide the money it needs to pay for the new swimming pool.

The Society is not qualified to comment on the propriety of the agreement between Worthing and Roffey, but it does consider that it undermines confidence in the planning system. How can a planning authority be regarded as an impartial judge of the merits of a planning application if it has already agreed its content with the applicant, and has a financial interest in maximising the scale of the development?

#### **Worthing's Relevant Planning Policies**

The Core Strategy and the Supplementary Planning Documents on Residential Development and Tall Buildings **all** emphasise that new development should respond to the character and density of the existing buildings adjoining a development site; and, specifically, that the new development on the Aquarena site should embrace a mix of uses. The proposal instead suggests a much higher density than in the surrounding area, 212 dwellings to a hectare, and buildings which are therefore much bulkier and taller than the buildings that adjoin the site. The development would also contain only one commercial unit among 147 apartments, and so would lack the cafes,

restaurants and retail activities proposed in the Core Strategy. Worthing has approved a development that is incompatible with its own planning policies.

**The policies which conflict most clearly with this application are:**

### **Core Strategy**

1. Strategic Objectives 2 and 6, which emphasise the importance of improving public spaces and the environment, and of ensuring that new development is of a high standard and respects the character and local distinctiveness of the borough. **Comment:** the proposal does nothing to improve public spaces and the environment, and does not respect the character of the area or its local distinctiveness.
2. Area of Change 1 relates to the Aquarena and states that the objective of redevelopment is to promote a mix of uses, which could include hotel, café/restaurant, residential, supporting retail and leisure. **Comment:** The proposal is almost wholly residential.
3. Saved Policy CT3 on coastal development states that development should be appropriate to its area in terms of density, scale, height, massing, appearance, orientation, and siting. **Comment:** The proposal meets none of these requirements.

### **Guide for Residential Development**

This guide emphasises that development should respond to the local character, and relate well to its surroundings. Designers should consider the local setting, surrounding densities, and local building

heights. **Comment:** The proposal is wholly alien to local character and the local setting; the density is much greater than in the surrounding area, and the proposed buildings are all much taller than the adjoining buildings.

### **Tall Building Guidance**

The more important of the many policies it contains which conflict with the proposal are:

- 1. Locational Criteria.** Tall buildings should be located near transport interchanges and corridors, to maximise access to a mix of transport options and minimise dependence on car use.  
**Comment:** The Aquarena is about a mile from the nearest transport interchange at Worthing railway station. The only public transport near the site is the bus service along Brighton Road.
- 2. Locational Criteria.** Sites in or close to the town centre are most appropriate for tall buildings. Proposals that do not strengthen existing centres are less likely to be supported.  
**Comment.** The Aquarena site is about 250 yards from the boundary of Worthing Town Centre. It does not lie in any other centre. It is therefore a site that is less likely to be supported.
- 3. Context** Tall buildings are difficult to fit in near Conservation Areas and Listed Buildings. If near a Conservation Area, a tall building would need to be carefully designed, and would generally only be considered if it enhanced the area. The backdrop of listed buildings should be protected, if they are landmarks. **Comment.** The proposed development cannot be said to enhance the area. Beach House (Grade II\* listed) is a landmark, and the proposed tower would form part of its backdrop. The Aquarena site should therefore be considered unsuitable for a tall building.

4. **Context and Townscape.** Tall buildings are expected to provide new open spaces for residents and to help to deliver new open spaces and improvements to the public realm. **Comment.** The proposed development would provide a courtyard for residents, but would contribute no new open spaces and no improvements to the existing public realm.
5. **Townscape.** The height of tall buildings should depend on their context. The height of a new building should be related to that of adjoining buildings, so that it does not look unsightly or disproportionate. **Comment.** The height of the proposed buildings is in no way related to that of adjoining buildings, so that they would appear unsightly and disproportionate.
6. **Townscape.** Tall buildings should create interest at ground level and integrate with the streetscape, by incorporating activities such as leisure, retail or food. **Comment.** The proposed buildings would have none of these activities at street level; the building would have residential units at street level, and would not be visually integrated with the street.
7. **Townscape.** Tall buildings on Worthing's seafront should enhance linkages between the seafront and the town. **Comment.** The proposed development is a closed residential unit that would do nothing to improve links between the seafront and the town.

### **Roffey's Arguments**

The development brief from Roffey seeks to justify the density of 212 dwellings per hectare. But the contract shows that this density has clearly been chosen to maximise the financial return from the site.

Roffey's Urban Design and Landscape Design Statement is a document conceived to justify the bulk, mass and scale. An example is Item 6.11 stating that "the proposal has been designed with full regard to the context. Particular attention has been paid not only to the proximity of Beach House and Farncombe Road Conservation Area but also the Victorian villas on New Parade." The proposed buildings differ so radically in style and scale from the adjoining buildings that it is impossible to take this statement seriously, and we disagree absolutely.

Elsewhere (page 10) scale and mass are discussed, with various diagrams of massing tests which fail to show the impact on New Parade or Brighton Road. On page 11 a variety of blocks are shown as a backdrop to Splashpoint only. The impact on all of the surrounding area is not shown, although Worthing's planning policies expect an applicant to show it.

Roffey's Statement mentions the unrealised Teville Gate scheme, Manor Lea and the tall blocks of the 1960/70 era "peppercotted" west of the town centre and nearby, stating there is "no rhythm or pattern" in their development.

### **Deficiencies of Roffey's Proposal**

The mistakes of the past are returning to haunt the planners, and are being used to justify this invasion of the east beach front. However, the disparate apartment blocks between Heene Road and Grand Avenue have a road and promenade between them and the beach. Roffey's 21-storey tower is intended to be built on, until recently, a public open space, and will have only Beach Parade between it and the shingle of the seashore. It will be 50% higher than Manor Lea. The tower design is not 'iconic' but an ordinary very tall apartment block with no cultural aspirations. As a purely residential development, it cannot contribute to the leisure and recreational activities of the seafront's Active Beach Zone. The "spirit of place" enjoyed by East Worthing will be destroyed. If built, a dangerous precedent will be set.

The development proposes a tall slab block on Brighton Road that would dominate the street scene. The north western tower would be 9-storeys. The height would drop to 5 storeys at the east end of the Brighton Road frontage, adjacent to the shopping parade, but rise to 6 storeys on the east front facing Merton Road. The block on Brighton Road would eliminate sunlight from the road in winter months.

### **Impact on Traffic**

The development is forecast to add about 3% to the peak hour traffic in Brighton Road. It is expected to generate 45 vehicle movements in the morning peak hour. It is suggested that this increase will not overload the neighbouring junctions; the queues of vehicles at peak hours are attributed to slow moving traffic in Steyne Gardens, where the narrow traffic lane reduces speed. But any additional traffic is bound to increase congestion and lengthen the queues.

The entrance and exit of the car park with 221 spaces (77 for public use) is to be on Merton Road making this a car dominated road. It may need traffic lights at the junction with Brighton Road, where right turns will be difficult at peak hours.

### **Conclusions**

The proposed development would harm an important and attractive area of Worthing. The site of the Aquarena, on the seafront adjoining the historic Beach House, the modern Splash Point swimming pool and the Farncombe Road Conservation Area needs a development that respects its surroundings. In other words, it needs a development that conforms to the planning policies of Worthing Borough Council. Roffey's proposal manifestly does not do so, and should therefore be refused planning permission.

6<sup>th</sup> January 2015

David Sumner  
Chairman  
The Worthing Society.