

Planning & Heritage Statement

7-15 Newcastle Avenue

Worksop



ELG

January 2021

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1. INTRODUCTION

- 1.1 This Planning & Heritage Statement has been prepared by ELG Planning on behalf of BS Squared Ltd. to accompany a planning application for the demolition of the existing buildings and the formation of a public pay & display car park, along with parking meters, hard and soft landscaping and associated works.
- 1.2 This supporting statement will provide the planning policy justification for this proposal, clearly demonstrating its compliance with the development plan and key material planning considerations that are deemed relevant to the determination of the application, including the National Planning Policy Framework (NPPF). It will also consider the impact of the proposed works on the character and appearance of the Worksop Conservation Area.

Structure of the Statement

- 1.3 The structure of this statement is as follows:

Section 2 discusses the background and context of the site.

Section 3 describes the development proposals

Section 4 sets out the relevant planning policies and context

Section 5 will assess the planning considerations.

Section 6 provides a heritage assessment.

Section 7 draws conclusions on the overall findings of the statement.

2. BACKGROUND & SITE CONTEXT

- 2.1 This application relates to a previously developed site within the main built up area of Worksop, with active frontage onto Newcastle Avenue and in close proximity to the shops and services located in the town centre. The application site currently comprises a building located centrally within the site, comprising a flat roofed, two storey commercial property (with a single storey side unit) constructed of brick; it is understood that this building was constructed in 1950/1960s. The building comprises of 3no. commercial units, consisting of an MOT Station and workshop, as well as a retail unit in use for carpet sales, and an additional smaller retail unit occupied by a car rental firm. At present, vehicular access and egress from the site is taken directly onto Newcastle Avenue. The application site is entirely hard surfaced with impermeable surfaces including tarmac and concrete.

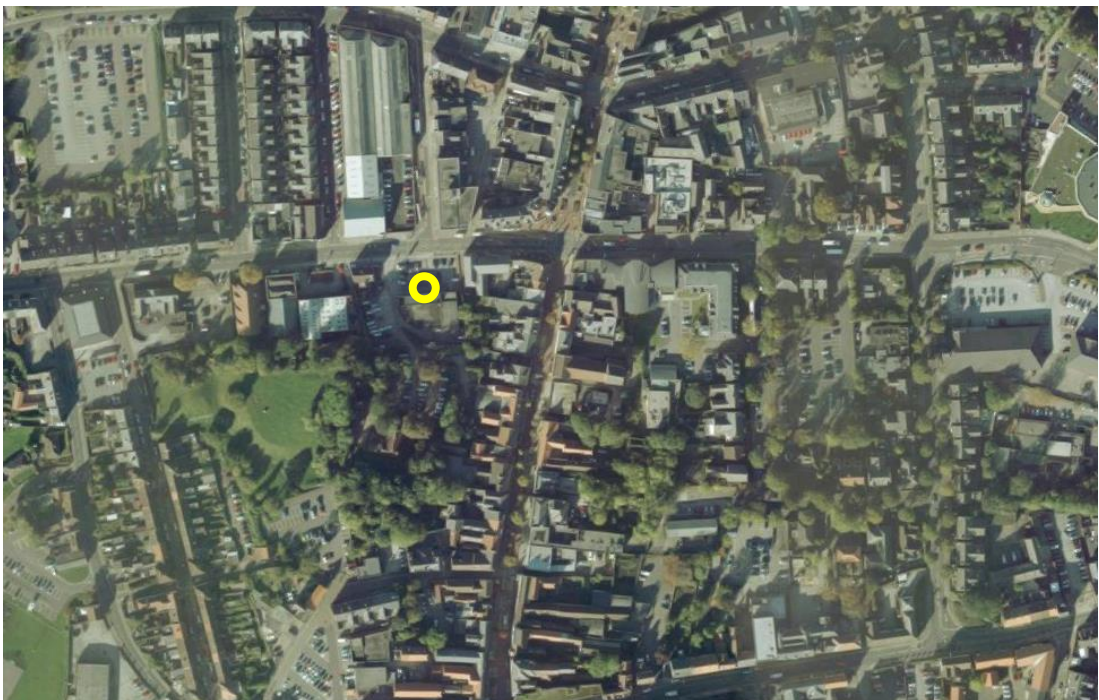


Figure 2.1: Aerial Map of Worksop (site marked by yellow circle)

- 2.2 In describing the site boundaries, the site is well defined by low brick walls at the southern, eastern and western boundaries. The northern boundary comprises an existing, low rising post and rail metal fence painted white, with the access/egress onto Newcastle Avenue. Along Newcastle Avenue, to

the east and west, lies further retail units fronting on to the pavement. The east of the site backs onto the rear of a parade of shops along Bridge Street, whilst to the west lies a Kwik Fit garage.



Figure 2.2: Images of application site

- 2.3 The application site is situated within the Worksop Conservation Area, although there are no Listed Buildings on the site. However, Nos. 60, 62, 64 and 66 Bridge Street are Grade II Listed Buildings located beyond the eastern boundary of the application site. Given its town centre location, the surrounding land use is predominantly commercial and retail uses. However, it is clear that the prevailing character is mixture of 20th and 21st Century modern developments amongst the retained historic development from 18th Century. The site is also nearby a Scheduled Ancient Monument 'Castle Hill' located to the south west of the site. Further assessment of the character of the area is presented later in this statement

Planning History

2.4 Several planning applications have been considered on this site over the years. However, the majority of them were decided more than ten years ago and are therefore not relevant to this current application. The most recent applications on this site consist of the following:

- 13/01276/COU – approved 17th December 2013. Change of use of car rental premises to taxi booking office
- 12/01267/RSB- approved 16th October 2012. Change of use of car showroom and workshop to retail sale of beds and carpets

Pre-Application Discussions

2.5 Paragraph 39 of the National Planning Policy Framework (NPPF) recognises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

2.6 A pre-application enquiry was therefore submitted by the applicant to Bassetlaw District Council (the LPA) on 29th July 2020. The formal pre-application response received on 16 November 2020 confirmed that:

'In principle the development of the car park is acceptable within Worksop, close to the town centre. The main issues in any application submitted will be addressing the flood risk and drainage issues and the highway safety issues. The Highway Authority have no objection in principle, subject other details being amended as set out in their attached comments.

The site is within the Conservation Area and the setting of an ancient monument and other nearby listed buildings. Conservation have no objection to the proposal.'

- 2.7 In view of the above, the LPA has given clear indication that the proposed scheme for the demolition of the existing buildings and formation of a public pay & display car park would be acceptable in principle, and that no objections have been raised from Highways or Conservation consultees, subject to addressing the minor comments in the planning application. Other matters, such as landscaping, design, flood risk, drainage, ecology and potential contamination risks are further addressed within this Planning Statement and the suite of technical information that accompanies the application submission.

3. DEVELOPMENT PROPOSALS

3.1 The proposed development relates to the demolition of the existing commercial building on the site and the change of use of land to form a permanent, public pay & display car park, with associated hard and soft landscaping works, pay & display machine and instructional signage. The proposed site plan submitted with this application is illustrated below, showing the site layout of the proposed car park, which comprises 87no parking spaces (incl. 6no disabled parking bays). The block plan submitted with this application identifies the extent of the buildings to be demolished.



3.2 The applicant (BS Squared Ltd) both develops and operates its own car parks and also, having good relationships with the major UK car parking companies, owns sites which it leases to them on commercial terms. As such, they are experienced in operating public car parks nationally. To this end, BS Squared Ltd are keen to deliver a high quality form of car park to facilitate easy and safe car parking use in the town centre. The car park will feature an Automatic Number Plate Recognition (ANPR) system linked to pay machines that will accept cash, card, phone payments and smart phone

app payments through the Ringo app. The car park is intended to be as versatile as possible, allowing both long and short term stay at reasonable prices, in order to serve varying need for customers and users of the town centre, including office/shop workers as well as shoppers and tourists. In addition, it is anticipated that permits will be offered to serve some office buildings in the area.

- 3.3 Details such as the car park design, access, layout and landscaping are discussed further in Section 5 and 6 of this Statement.

4. PLANNING POLICY CONTEXT

Adopted Development Plan

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that the statutory Development Plan will continue to be the starting point for the consideration of planning applications for the development or use of land, unless material considerations (namely National Planning Policy Framework) indicate otherwise.

Development Plan

- 4.2 For the site in question, the development plan in force for the area comprises of the Bassetlaw Core Strategy and Development Management Policies Development Plan Document (adopted December 2011).

- 4.3 The application site is located within the town of Worksop and lies directly adjacent to the western boundary of the defined Worksop Town Centre. The adopted Bassetlaw Policy Map (2011) features a wider map for Worksop Town, as well as a town centre inset map. The extract of the inset map is shown below to show better clarity of the policy designations.



Figure 4.1: Bassetlaw Policy Map (2011): Worksop Town Centre Inset Map (application site outlined red)

- 4.4 The following policies are deemed relevant to this application:

- Policy CS1: Settlement Hierarchy
- Policy CS2: Worksop

- Policy DM4: Design & Character
- Policy DM8: The Historic Environment
- Policy DM9: Green Infrastructure; Biodiversity & Geodiversity; Landscape; Open Space & Sports Facilities
- Policy DM12: Flood Risk, Sewerage & Drainage
- Policy DM13: Sustainable Transport

Other Material Considerations

National Planning Policy Framework

- 4.5 The revised NPPF was published in February 2019 and sets out the Government's planning policies for England and how these should be applied. The NPPF must be taken into account as it is a material consideration in planning decisions.
- 4.7 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development and, in order to achieve this purpose, the planning system has three overarching objectives, which are interdependent and need to be supported in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure;
 - **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

- **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.6 The NPPF confirms that at its heart is a presumption in favour of sustainable development, which for decision-taking means:

- *approving development proposals that accord with the development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

4.7 Section 16 of the NPPF relates specifically to heritage assets and conservation matters and is of relevance given the sites location within a Conservation Area.

4.8 Paragraph 189 of the NPPF states:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'

4.9 Paragraph 190 states '*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*'

4.10 Paragraph 192 states that in determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness.*

4.11 Paragraph 193 states that:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

4.12 Paragraph 194 advises that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

4.13 Paragraph 195 states that:

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

4.14 Paragraph 196 states that:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

4.15 Paragraph 197 states that:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

4.16 Paragraph 199 states that:

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.'

4.17 Paragraph 200 states that:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

4.18 Paragraph 201 states that:

'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under

paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole’.

- 4.19 Throughout this planning statement the relevant parts of the NPPF will be highlighted and discussed where appropriate.

Emerging Draft Bassetlaw Local Plan

- 4.20 The emerging Draft Bassetlaw Local Plan underwent Regulation 18 consultation between 25th November 2020 and 20th January 2021 and it is expected to progress to Regulation 19 consultation on the Publication Draft in Summer 2021, before a targeted date of submission of December 2021 to the Secretary of State for public examination. Evidently, the emerging Local Plan cannot be afforded weight at this stage.

5. PLANNING ASSESSMENT

5.1 Taking into account the proposed development and site context, the main planning considerations in relation to the development proposals are considered to be:

- The Principle of Development;
- Design & Landscaping;
- Highways;
- Flood Risk & Drainage;
- Ecology; and
- Contaminated Land.

5.2 Heritage considerations will be discussed in detail in Section 6.

Principle of Development

5.3 The proposed development is for the demolition of the existing commercial building on the site and the change of use of land to form a permanent, public pay & display car park, with associated hard and soft landscaping works, car park pay & display machine and instructional signage.

5.4 The application site is located within the Development Boundary of Worksop, as defined on the Local Plan Policy Map. Policy CS1 of the adopted Bassetlaw Core Strategy Development Plan Document sets out the Settlement Hierarchy, which defines Worksop as a Principle Urban Area a Primary Town within Bassetlaw. Policy CS2 confirms that the focus for major housing, employment and town centre retail growth within Worksop.

5.5 Policy CS2 confirms that Worksop is '*the main retail and employment centre for the District and provides leisure and recreation facilities for the surrounding area, as well as secondary and further education opportunities.*' Policy CS2 further states that '*development in Worksop will be expected to contribute to*

the town's role as the District's Principal Urban Area, making both qualitative and quantitative improvements to the housing, employment, retail and leisure offer, as well as enhancing the built and natural environment and protecting and enhancing the town centre as a retail and leisure destination.'

- 5.6 The proposals will result in the delivery of an 87no. space public pay & display car park within the development boundary of Worksop and is therefore in accordance with Policy CS2. Furthermore, the proposals will provide a high quality form of car park on a vacant, previously developed site, in a safe and easily accessible location in close proximity to major shopping parades of the town centre. The location of the car park is conveniently located adjacent to one of the main cross road junction of the B6024 and Bridge Street and so is strategically one of the most central locations for customers to park for access to shops and services. In view of this, the proposed car park will provide excellent access for shoppers, tourists and employees to shops, services and local facilities in the town centre and will therefore have significant economic benefits to the local employment, retail and leisure offering within the local vicinity, and will contribute positively towards the vitality and viability of Worksop Town Centre.
- 5.7 As noted by the applicant in the pre-application enquiry, Worksop town centre has suffered from a lack of office development in the town centre and those offices developed in the latter part of the 20th Century have struggled to compete with out of centre offices which feature better levels of parking provision. Furthermore, existing businesses and offices within the town lack sufficient parking provision of their own and are therefore reliant on public car parks as well as public transport. As such, it is considered that the proposed car park will also provide a level of parking provision for office staff within the town centre, thereby allowing Worksop to compete with alternative locations for office and new employment opportunities, as well as making the existing business and office space more attractive and viable.
- 5.8 Furthermore, the recent COVID19 pandemic has had a significant negative impact upon businesses in the town centre. It is considered that developments which encourage easy of access to the town centre should be supported, in order to support the local businesses and attractions that have

suffered economically since the pandemic began. In this case, the provision of the proposed car park in this easily accessible location is likely to assist in a faster economic recovery of Worksop Town Centre following the COVID19 pandemic, as it will encourage visitors to the town centre in the short and long term. As such, we would request that officers give weight to this important factor.

- 5.9 Additionally, it is important to note that the most recent occupant of the commercial unit vacated in September 2020 as they could no longer obtain insurance cover due to the damage caused by the flooding of the site and building in November 2019. As a result, the site is unlikely to be re-let in its current form for a number of reasons, specifically due to the challenging market conditions and levels of insurance excess. Based on this, it is likely that other prospective occupiers would come to the same conclusion and, as such, the current buildings have low prospects of future occupation. We therefore consider that there is a compelling case for the redevelopment of this site. In this instance, BS Squared Ltd are a proven car park owner and operator and therefore represent a realistic opportunity to ensure the active re-use of this site.
- 5.10 In view of the above, the proposal is considered to be a sustainable form of development and is in accordance with the local development plan, in particular Policy CS1 and CS2 and the relevant parts of the NPPF.

Design & Landscaping

- 5.11 Policy DM4 of the adopted Development Plan relates to the design and character of proposed developments and sets out a range of general development criteria, which considers matters such as character, architectural quality, the public realm, accessibility, amenity and sustainability. Furthermore, paragraph 127 of the NPPF stipulates that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

- 5.12 In considering the local character, the existing site consists of 0.2ha of previously developed land with a rough square shaped area. The site features areas of open hardstanding land to the north and west of the site, most recently used for vehicle/ van hire and sales. In the centre of the site lies the existing two storey building constructed of red brick with a flat roof and it is understood to have been constructed in 1950s/1960s. The site features very little soft landscaping itself, and consists of hard surfacing across the site, with modern brick boundary walls at the south, east and west boundaries.
- 5.13 The proposed development will see the demolition of the existing building on site to make way for the proposed use as a public car park. No replacement buildings are proposed, which will therefore result in a more open character to the site, creating views through the site to the rear of Bridge Street within the Conservation Area as well as the rear of the Grade II Listed Buildings. The existing building proposed for demolition is considered to be of low architectural merit, being a mid 20th century building occupied by commercial premises. In addition, given the most recent use for car/van sales and the storage of vehicles on the north and west part of the site, it is considered that there would be similarities between the current and proposed appearance of the site and so the character would not significantly change from the current use. In view of the above, it is considered that the proposed car park development would be appropriate and respectful to the surrounding character. Furthermore, the existing soft landscaping features which are located just beyond the eastern and southern boundary will be retained and unaffected by the proposed development.
- 5.14 Moreover, the existing mixed hardstanding will be resurfaced across the site with an attractive blend of tarmac and block sets, which will significantly improve the appearance of the site in the street scene and will eliminate the potential of gravel being dispersed on the highway. Furthermore, in efforts to improve the appearance of the site, the applicant has indicated proposals for soft landscaping throughout the site improve the character and appearance of the public realm and conservation area. The species of the planting have been considered following recommendation of an ecologist and are annotated on the proposed site plan. The site frontage along Newcastle Avenue will feature a strip of low level landscape planting, providing a natural boundary to the site, reinforced

by knee high timber fencing to clearly define the car park's northern boundary. This will clearly be an improvement to the current appearance of the site frontage as it will replace the existing white metal post and rail fencing that is set into the hard standing. The four corners of the site feature stronger levels of planting, including tree planting to the north east corner, whilst other landscaped areas are spread throughout the site. All of these elements are considered to be visual improvements to the site which would contribute positively towards the character and appearance of the site in the street scene.

- 5.15 In terms of accessibility, the current site is mostly flat, and as previously mentioned, will be resurfaced with tarmac and block sets, therefore providing level and smooth surfaced access across the site making it suitable for all users. In addition, 6no disabled parking bays are located along the site frontage, which is in closest proximity to the pedestrian footpath network leading into the town centre.
- 5.16 Turning matters of amenity, the application site lies in a prominent town centre location surrounded by varying commercial uses and there are limited residential properties in the vicinity. However, given that the proposals will see the demolition of the existing building and no new building on the site, it is considered that there will be no impact on residential amenity in terms of privacy, overbearing impact or overshadowing.
- 5.17 Therefore, for the reasons discussed the proposed development is deemed to accord with Policy DM4 of the Core Strategy and the relevant parts of the NPPF.

Highways

- 5.18 Policy DM4 of the Core Strategy indicates that safe and suitable access should be provided for all. Paragraph 109 of the NPPF states that '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*'

5.19 The historic uses of the site witnessed vehicle movement associated with the three commercial units in the existing building on the site, which predominantly comprised the MOT station and workshop, vehicle sales and rental. As such, there were high levels of movements to the site including MOT/workshop customers, car and vehicle hire/sales customers, retail customers, test drives, as well as parts and vehicle deliveries. Furthermore, staff of the retail units were permitted to park on site, as well as the site owner allowing ad hoc third party parking. Evidently, the site has featured high levels of unregulated vehicle movement associated with the businesses.

5.20 It is critical to highlight that the Local Highway Authority provided positive comments (dated 7th September 2020) as part of the pre-application enquiry for the proposed re-use of the site as a pay & display car park accommodating approximately 91no parking spaces. The Highway Authority confirmed that:

"The Highway Authority has no objection in principle to the reuse of the site as a car park.

The four parking spaces to the side and perpendicular to the site access as currently proposed on plan reference 100298_03_000_01 Rev A would require re-orientating such that manoeuvring vehicles would not block the site access. The circulation of the car park should be reversed such that it is not necessary for accessing and egressing vehicles to cross paths at the junction.

The existing dropped kerb footway crossing opposite Hardy Street will require removing and replacing with a full height kerb. All parking and manoeuvring space will require surfacing in a bound material, and the site will require draining to prevent the unregulated discharge of surface water onto the public highway"

5.21 In view of the above, there is clear support in principle from the Highway Authority, subject to the suggested amendments to the car park layout, which have been addressed in submitted proposed site layout plan with this planning application. The four bays perpendicular to the site access have

been altered and re-orientated to avoid conflict with the access. Furthermore, the circulation of the car park has been reversed and has been designed to create a flow of traffic through the site, to avoid vehicle congestion within the car park that could result in cars backing on the highway. The one-way system further helps to reduce issues of vehicle conflict within the car park. Vehicle tracking has been conducted on the proposed layout of the car park, and it has been demonstrated that vehicles can safely enter and exit the parking bays without conflict with other users and parked vehicles.

- 5.22 The aisle width throughout the car park maintains 6m between parking bays, and the parking bays will feature dimensions of 5m x 2.5m which exceeds the minimum parking bay size standards (4.8m x 2.4m). The standard bays will be marked out in white thermoplastic lining so car park users can clearly see the bays, whilst the 6no. disabled parking bays will be marked with yellow thermoplastic lining. The applicant points out that the proposed car park has been designed to achieve the highest standard of the British Parking Association and will achieve a Park Mark recognition for safer parking.

- 5.23 The site will be resurfaced with tarmac and block sets, and appropriate drainage solutions will be provided in accordance with the recommendations of the Drainage Strategy, in order to prevent unregulated discharge of surface water onto the public highway.

- 5.24 In addition, given the amendments to the layout and some additional changes to the layout from the applicant's preference, the amount of spaces is now reduced to 87no parking bays on site, and therefore 3no. spaces lower than the pre-application scheme.

- 5.25 In terms of the site access, the existing site access will be blocked and the dropped kerb access will be replaced with full height kerb. The proposed new access is located further west along the Newcastle Avenue boundary and is now further from the Hardy Street junction, which is likely to improve the safe movement of vehicles on Newcastle Avenue. Indeed, the kerb is already dropped where the new site access is proposed, suggesting it has previously been used as an access to the site. New blister paving will be installed on the pavement where the kerb drops, as shown on the proposed plan.

- 5.26 In view of the above, the proposals have satisfactorily addressed the pre-application comments from the Highway Authority and it is considered that the proposed development for an 87no. space car park is acceptable in principle and considered to have no adverse impact upon highway safety. As such, the proposals are considered to be compliant with both Core Strategy Policy DM4 and Paragraph 109 of the NPPF.

Flood Risk & Drainage

- 5.27 Core Strategy Policy DM12 states that all new developments will be required to incorporate Sustainable Urban Drainage Systems (SuDS) and provide details of ongoing maintenance and management. Similarly, paragraph 163 of the NPPF states that new development should not result in the increased risk of flooding elsewhere and part c) indicates that all schemes should incorporate sustainable drainage systems to achieve this.

- 5.28 According to the Environment Agency Flood Risk Map (see figure 5.1 adjacent) the application site is located almost fully within Flood Zone 2 (medium risk) with a small, narrow strip of land to the north western corner of the site falling within Flood Zone 3. This planning application is therefore supported by a Flood Risk Assessment and Drainage Strategy, prepared by Dice Consulting Engineers Ltd.

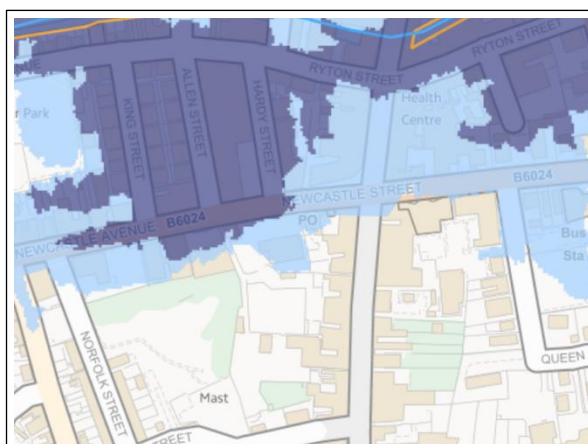


Figure 5.1: EA Flood Risk Map

- 5.29 Given the proposals are for a pay and display car park and will see the demolition of an existing building which has historically suffered from flooding, the proposed use is considered to be less vulnerable. The FRA report confirms that "the vulnerability of the development to flooding form all other

sources, such as surface water, groundwater, sewerage and reservoir has been assessed. It is considered all these sources post a low risk to the development, with the exception of surface water which poses a medium to high risk"

- 5.30 Notwithstanding this, the Drainage Strategy confirms that the ground is impermeable, based on the results from infiltration testing. The proposed surface water drainage system will provide attenuation for flows up to a 1 in 100-year storm event (+40% allowance for climate change). The proposed surface water strategy will not increase flood risk at the site or elsewhere. It will achieve this by proposing to discharge the surface water from the proposed car park to the public surface water sewers within Newcastle Avenue, via a new drainage network to be installed, with a discharge rate restricted to brownfield run off rates introducing a 50% betterment to existing flows, prior to connecting to an existing surface water manhole on site.
- 5.31 In view of the conclusions within the FRA/Drainage Strategy, it is considered that the proposals are compliant with Core Strategy Policy DM12 and NPPF Paragraph 163.

Ecology

- 5.32 The pre-application response from the LPA indicated that the existing building proposed for demolition would need to be assessed for ecological potential including bat habitat. As such, a Preliminary Ecological Appraisal has been prepared and submitted with this application which confirms that:

"The buildings within the Site are considered to offer negligible bat roost potential due to a lack of suitable roosting opportunity and the habitats within the Site are considered to be of negligible value to foraging and commuting bats i.e. hardstanding, in an urbanised environment with high levels of artificial light and on no wildlife corridor."

- 5.33 Furthermore, it was confirmed that *"No other potential ecological constraints have been identified"*.

- 5.34 The ecology report further makes recommendations for compensation and enhancement planting which will increase the ecological value of the site, which the applicant will implement and maintain.
- 5.35 In view of the above, the proposals are acceptable in ecology terms when assessed against paragraph 170 of NPPF and Policy DM9 of the Core Strategy.

Contaminated Land

- 5.36 Paragraph 178 of the NPPF states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 5.37 It is known that the site was historically used as a petrol filling station, and prior to that, it was occupied by residential dwellings. As such, the applicant has completed a Phase 1 Contamination Survey to assess the ground conditions and potential for contamination, which has been submitted with this planning application. The report recommends that a Phase II site investigation be completed and confirms that any future Phase II intrusive investigations can be conditioned as part of any planning permission. Full recommendations are included in the Phase I report.
- 5.38 In view of the above, the contamination risks have been assessed and the applicant is willing to agree to to an appropriately worded condition that will satisfy the requirements for the Phase II site investigations. The proposals are therefore compliant with paragraph 178 of NPPF.

6. HERITAGE CONSIDERATIONS

- 6.1 Policy DM8 of Core Strategy confirms that *“support will be given to development proposals or regeneration schemes (particularly in central Worksop, Retford and Tuxford) that protect and enhance the historic environment and secure its long-term future. Such proposals must recognise the significance of heritage assets as a central part of the development.”*
- 6.2 Relevant paragraphs of the NPPF relating to heritage assets have been set out in Section 4 and will be referred to in more detail in the assessment below.
- 6.3 In terms of identifying the nearby heritage assets, the application site lies within the Worksop Conservation Area and 60, 62, 64 and 66 Bridge Street are located to the south east of the site which are Grade II Listed Buildings. Furthermore, Castle Hill Ancient Monument is located to the south west of the site.
- 6.4 The current proposed development will see the demolition of the existing building and the creation of a public pay & display car park, with associated hard and soft landscaping and associated works. No replacement buildings are proposed on site. Indeed, the redevelopment of this currently vacant site including the demolition of the buildings which have previously witnessed flood damage, would see the site being brought into active re-use and would secure its more viable and long term future, and should therefore be supported under Policy DM8. Furthermore, the use as a public car park with excellent access to the nearby town centre is likely to gain additional attraction and appreciation of the nearby heritage assets.
- 6.5 It is noted at paragraph 201 of the NPPF that not all elements of a Conservation Area will necessarily contribute to its significance and that where the loss of a building which makes a positive contribution to the conservation area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the

relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.

- 6.6 It is considered that the site as a whole makes no positive contribution to the significance of the Conservation Area. In assessing the potential impact regarding the demolition of the existing building, the existing two storey building constructed of red brick with a flat roof and it is understood to have been constructed in 1950s/1960s. As noted in the pre-application response from the LPA Conservation Officer, there would be no concerns with the demolition of the existing building as it is of neutral character and would result in no harm caused to the character and appearance of the Conservation Area or the setting of the Scheduled Ancient Monument nearby and the Listed Buildings. We would concur with this assessment. Furthermore, the demolition of the existing building will allow for improved views towards the Castle Scheduled Ancient Monument from Newcastle Avenue, as well as improving views to the rear of the the Listed Buildings along Bridge Street.
- 6.7 In addition, the appearance of the proposed car park would essentially be similar to the existing use, which has historically featured car/van sales and hire at the site frontage, which were parked on hardstanding surface across the site. As such, there would be no adverse impact in this respect. Furthermore, the comprehensive redevelopment of the site to form a high quality form of car park offering is considered to improve the setting, as it would see the removal of various signs and temporary structures associated with the former businesses, and be replaced with pay & display machines.
- 6.8 Moreover, the landscaping proposals as discussed in paragraph 5.14 in Section 5 of this statement will contribute positively towards the setting of the Conservation Area.

- 6.9 It is therefore evident that the proposed development would not give rise to harmful impacts to the setting of the Worksop Conservation Area and the development would result in a minor enhancement to the character of the wider Conservation Area.
- 6.10 Consequently, we are of the opinion that the proposals would preserve the special character, appearance and setting of the Worksop Conservation Area and other nearby designated heritage assets and would therefore accord with the heritage-related policies of the adopted Bassetlaw Core Strategy and national guidance contained within the NPPF in this regard.

7. CONCLUSIONS

7.1 To conclude, it is considered that the proposals are acceptable in all respects, having regard to the relevant development plan policies, and the NPPF. This is because:

- Formation of a high quality car park on a previously developed site, in a safe and easily accessible location in close proximity to major shopping parades of the town centre
- Excellent access to shops, services and local facilities in the town centre, thereby contribute positively towards the vitality and viability of local businesses and Worksop Town Centre
- Active re-use of a vacant site which is likely to remain disused due to market conditions and historic flooding of building
- The proposed development is considered to provide a minor enhancement to the character and appearance of the Conservation Area and views towards Castle Hill Scheduled Ancient Monument and nearby Listed Buildings
- The design and landscaping proposals would be a positive improvement to the appearance and character of the site
- The development is acceptable in all other regards, including ecology, contamination, residential amenity and highways.

7.2 Due to all of the above, we respectfully request that the Council resolves to grant planning permission for this demonstrably policy compliant form of development without delay, in line with the NPPF presumption in favour of sustainable development, subject to any conditions deemed appropriate on this occasion.