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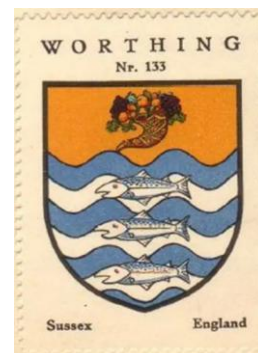
Kinetic Centre, Theobald Street,
Elstree, Hertfordshire, WD6 4PJ

Planning Statement Prepared on behalf of Capella Partnership.

**Full Planning Application
for the erection of a block of
29 apartments.
Capella House Car Park,
Railway Approach,
Worthing, BN11 1UR.**

PLANNING STATEMENT

October 2025



PPML Directors: Pravin Patel and Marcus Lambert
Registered Office: 4th floor, Park Gate
161-163 Preston Road, Brighton, BN1 6AF
Company registration Number 5201427

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EXECUTIVE SUMMARY

This Planning Statement has been prepared on behalf of the Capella Partnership in support of a full and listed building application on open carpark land, Railway Approach, Worthing, within the district of Adur & Worthing and the County of West Sussex. This development site sits within the settlement of Worthing along Railway Approach and close to Worthing Train Station. The site is bounded by the rail line to the north, the former station building to the west and a Morrison's service yard to the east. The site is currently an open car park providing parking for a neighbouring office building.

This full planning application proposes a new apartment block consisting of 29 x 1 & 2 bedroom apartments. The 29 dwellings will consist of 18 x 1 bedroom and 11 x 2 bedroom apartments in a block on the north side of Railway Approach, Worthing. The proposal includes a vehicular and pedestrian access taken from Railway Approach opposite Teville Gate House which is occupied by HMRC. Teville Gate to the south is a site allocation which has an indicative capacity of 250 residential units & 4000 sqm commercial. The proposal is designed to accord with the Worthing Council Development Plan and supplementary planning documents.

Quality Assurance

The Capella Partnership is committed to providing a high-quality development and a high standard of design within the development. This approach applies equally to spaces as to buildings, and equally to public as to private spaces. The objective will be the creation of a safe and healthy local environment that enables connection with a diverse, vibrant and creative local culture to develop, encouraging pride in the community and cohesion within it.

1.0 INTRODUCTION

1.1 This planning statement has been prepared on behalf of the Capella Partnership in support of a Full Planning application at Capella House car park, Railway Approach, Worthing (the site). The planning statement looks at the principle of development for residential development, site layout, retained office parking, amenity and design requirements.

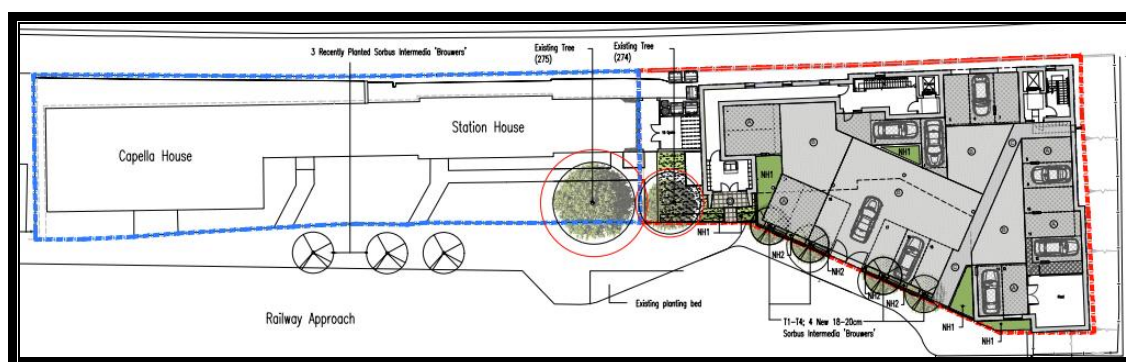
1.2 This supporting statement describes the proposal for the existing carpark on Railway Approach, Worthing and its relationship to the former railway station building to the west and a supermarket service yard to the east, railway line to the north and Teville Gate House to the south and the compliance of the proposal with planning policy. The design process has been informed by the Statutory Development Plan, adopted Supplementary Planning Guidance and pre-application engagement with planning and conservation officers.

1.3 This planning statement is to be read in conjunction with the submitted covering letter, application forms, plans and the following supporting documents and drawings:

- DAS & Scheme Drawings – Architectus
- Planning Statement, October 2025 – PPML Consulting Ltd
- Heritage Statement, October 2025 - ECE Planning
- Daylight, Sunlight and Overshadowing Assessment, Aug '25 – Blackacre
- Daylight & Sunlight Self-Test Assessment Sept 2025 – Blackacre
- Preliminary Ecological Appraisal & Biodiversity Gain Statement, July 2025 – Lizard Ecology
- Transport Statement and Travel Plan Statement, October 2025 - GTA Transport
- Energy & Sustainability Statement, October 2025 - Southern Energy Consultants
- Flood Risk Assessment and Drainage Strategy GTA Consulting Engineers
- Air Quality Assessment, July 2025 – Cass Allen
- Site Assessment and Market Report, June 2025– Woods Surveyors

2.0 SITE DESCRIPTION AND SURROUNDINGS

- 2.1 This development site measuring 0.088ha sits within the settlement of Worthing along Railway Approach and close to Worthing Train Station. The site is bounded by the rail line to the north, the former station building to the west and a Morrison's service yard to the east, and the imposing Teville Gate House which is occupied by HMRC to the south. The site is currently an open car park providing parking for the neighbouring office buildings.
- 2.2 The character of the area is clearly mixed with office, commercial and residential buildings close to a public transport interchange, shops and services. The site is located within the Railway Approach Office Area where there is a general presumption against losses to other uses. Teville Gate to the south is a Local Plan site allocation which has an indicative capacity of 250 residential units & 4000 sqm commercial, which will add to the mixed-use nature of this area.



**Extract of Site Layout Plan extract taken from architects drawing
24/014/01403 P01**

3.0 PLANNING HISTORY

No recent relevant planning history.

3.1 Pre-Application Engagement

- Site located within a protected Railway Approach Office Area (Policy DM11)
- Mixed use area and a residential use may be acceptable provide the application demonstrates there is no demand for additional office space.
- Retained office parking important to maintain viability of existing office use.
- The adjacent former station building is a Grade II LB.
- Significant reductions in the scale of the scheme will be required before the LPA would be in a position to support a proposal on this site.
- Policy DM2 of Worthing's Local Plan says that development must make the best use of land with particular consideration given to the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.
- **Conclusion** - Justification is still needed regarding whether office development can be provided on site due to the site's location in a protected office area prior to the use of the site as residential can be supported. Significant alterations to the scale of the building are required to ensure it would be appropriate for its context. Concern is raised in relation to the less than substantial harm caused to the setting of the listed building.

4.0 DEVELOPMENT PROPOSALS

4.1 This Full Planning and Listed Building submission is for the erection of a 4 to 6 storey apartment block above undercroft parking. The apartment block will consist of 29 apartments including 20% affordable housing. The new apartment block will be served by a new vehicular and pedestrian access taken from Railway Approach. The 20 car parking spaces within the undercroft area will be retained for existing office parking associated with Capella House and Station House, to maintain their economic viability. The 29 new apartments will be provided as car free, which is wholly appropriate given the highly sustainable location adjacent to this public transport interchange, with opportunities for walking and cycling.

4.2 The proposed development seeks to be in line with national and regional planning policies, in addition to the Worthing Council Local Plan and Supplementary Planning Documents.

4.3 The residential apartments comprise a mix of one bedroom and two-bedroom dwellings. The dwelling mix can be summarised as follows:

Overall Mix of 29 apartments is as follows:

- 18 No. 1 Bedroom apartments (1b 2p)
- 11 No. 2 Bedroom Apartments (2b 3p x 10 & 2b 4p x 1)

4.4 The development of 29 No. Apartments on a site area of 0.0876 hectares results in a required high density which is appropriate given the proposed character of the surrounding area and the need to make best use of urban land. The NPPF encourages high density and taller buildings to be located in close proximity to public transport interchanges.

4.5 Each apartment will benefit from balconies with a minimum of 5sqm and larger terraces too for the recessed top floor penthouse apartments.

4.6 The proposal is for the redevelopment of the existing car park at the end of Station Approach to provide 29 residential flats as a car-free scheme. These

proposals are in accordance with current policies and guidance provided by West Sussex County Council and are compliant with national guidance documents such as Manual for Streets (MfS). The proposals are also in accordance with the Department for Communities and Local Government's National Planning Policy Framework 2025 (NPPF).

5.1 NATIONAL PLANNING POLICY

National Planning Policy Framework, December 2024

- 5.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. This new guidance emphasises that planning law still requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.1.2 Sustainable Development remains a core principle underpinning the National Planning Policy Framework. There are three objectives to sustainable development consisting of an economic objective, a social objective and an environmental objective. Pursuing sustainable development involves seeking improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. At the heart of the NPPF is a presumption in favour of sustainable development
- 5.1.3 In Para 11 to 14 the NPPF reinforces the presumption in favour of sustainable development but does not change the statutory status of the development plan as the starting point for decision making. The onus is on local planning authorities to have up-to-date local plans and neighbourhood plans.
- 5.1.4 In Paragraph 15 the NPPF makes it clear that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs

and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

- 5.1.5 Paragraphs 39-51: Local Authorities are required to approach decisions on proposed development in a positive and creative way. It is suggested that early engagement can have make a significant improvement in the efficiency and effectiveness of the planning system. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage.
- 5.1.6 Para 48: Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
- 5.1.7 In Para 124 the NPPF emphasises the need to make effective use of land. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.
- 5.1.8 In Para 137 the NPPF encourages the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.1.9 Local Planning Authorities are required to deliver a wide choice of homes for the community by planning for a mix of market and demographic trends, including older people and people with disability (Para 63).

5.2 Worthing Borough Council Statutory Development Plan

The Worthing Borough Council development plan comprises the following:

Worthing Borough Council Local Plan 2020 - 2036 and Local Plan Policies Map – Adopted 2023 inc. Town centre

Policy SP1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay.

Policy SP2 CLIMATE CHANGE

A comprehensive and integrated approach to addressing climate change will be taken.

Policy SP3 HEALTHY COMMUNITIES

New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and well-being needs in Worthing.

Policy SS1 SPATIAL STRATEGY

seek to deliver high quality development and provide for the needs of local communities and balance the impact of growth through the protection and enhancement of local services and (where appropriate) the safeguarding of employment sites, leisure uses, community facilities, valued green/open spaces and natural resources.

Policy SS3 TOWN CENTRE

To ensure that Worthing Town Centre continues to fulfil its sub-regional role, it is important to provide development that meets both quantitative and qualitative needs.

Policy DM1 HOUSING MIX

In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing 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.

Policy DM2 DENSITY

Higher densities, in excess of 100 dwellings per hectare should be achieved in most mixed use developments, flatted developments and developments located in the town centre and in areas close to public transport interchanges and services.

Policy DM3 AFFORDABLE HOUSING

i) Sites on previously developed land involving the development of flats there will be a requirement for 20% affordable housing;

Policy DM5 QUALITY OF THE BUILT ENVIRONMENT

Be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area.

Policy DM6 PUBLIC REALM

The enhancement of the public realm in Worthing, particularly in the town centre and seafront, is an integral part of the strategic objectives for the town. New development in appropriate locations, integrated sustainable transport initiatives or regeneration schemes will be expected to improve the public realm.

Policy DM7 OPEN SPACE, RECREATION AND LEISURE

Schemes of 10+ dwellings will be required to provide open space on-site in accordance with the Council's adopted standards.

Policy DM9 DELIVERING INFRASTRUCTURE

Development will be required to take into account existing infrastructure and to provide or contribute to the provision (and where appropriate,

maintenance) of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure.

Policy DM10 ECONOMIC GROWTH AND SKILLS

The Local Plan will support, promote and enable the continued development of a strong, sustainable and diverse local economy.

Policy DM11 PROTECTING AND ENHANCING EMPLOYMENT SITES

ii) The following key office locations will be protected: • Railway Approach

Policy DM15 SUSTAINABLE TRANSPORT & ACTIVE TRAVEL

In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.

Policy DM16 SUSTAINABLE DESIGN

All development (excluding householder applications) will be required to achieve the relevant minimum standards below unless superseded by national planning policy, Building Regulations or it can be demonstrated that it is not practicable, feasible or viable (in which case the minimum standard should be met as far as is possible).

Policy DM17 ENERGY

All new housing and major non-residential development should incorporate renewable and low carbon energy production equipment to meet at least 10% of predicted total energy requirements (after CO₂ reductions from energy efficiency measures).

Policy DM18 BIODIVERSITY

Planning applications should be supported by relevant environmental information, which is informed by appropriate up-to-date ecological information, prior to determination.

Policy DM19 GREEN INFRASTRUCTURE

Opportunities should be taken to incorporate elements of green infrastructure onsite to create, protect, enhance and manage green infrastructure assets and/or networks to achieve environmental net gain.

Policy DM20 FLOOD RISK AND SUSTAINABLE DRAINAGE

The Council will work with relevant bodies to ensure that flood risk in Worthing is managed and reduced. Development should be directed away from areas of highest risk of flooding from any source and opportunities should be taken to reduce flooding through sustainable drainage systems and natural flood management to deliver multi-functional benefits for people and wildlife.

Policy DM21 WATER QUALITY AND SUSTAINABLE WATER USE

Development should protect and enhance groundwater, surface water features and control aquatic pollution. Development will be permitted provided that it does not have an unacceptable impact on the quality and potential yield of local water resources, the water environment and its ecology.

Policy DM22 POLLUTION

New development in Worthing will be located in areas most suitable to the use of that development to avoid unacceptable risks from all sources of pollution.

Policy DM23 STRATEGIC APPROACH TO THE HISTORIC ENVIRONMENT

The Council will conserve and enhance the historic environment and character of Worthing, which includes historic areas, buildings, features, archaeological assets and their settings, important views and relationships between settlements and landscapes/seascapes.

Policy DM24 THE HISTORIC ENVIRONMENT

Where development affecting any designated or undesignated heritage asset is permitted, it must be of a high quality, respecting its context and demonstrating a strong sense of place.

Supplementary Planning Documents

- SPD: Guide to Residential Development (2013)
- Space Standards (2012) Developer Contributions (2015)
- Sustainable Economy (2012)
- Technical housing standards - nationally described space standard 2015

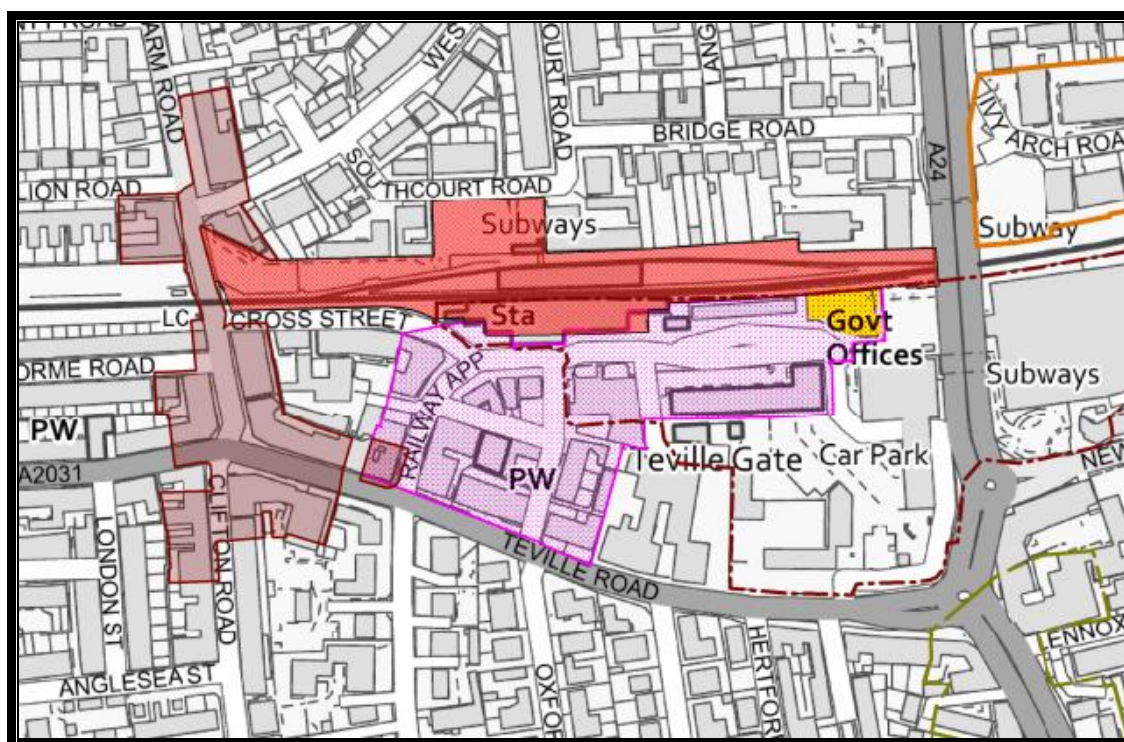
ANALYSIS AND COMPLIANCE WITH POLICY

6.1 This section of the planning statement provides an analysis of the proposed development in the context of the planning policy framework as set out in Section 5. In considering the Council's adopted planning policies the most relevant planning issues are identified below:

- Principle of Development
- Site Assessment and Market Report
- Heritage Assessment
- Design and Appearance
- Affordable Housing
- Trees and Landscaping
- Access and Parking
- Flood Risk and Drainage Strategy
- Energy and Sustainability
- Air Quality Assessment
- Sunlight & Daylight Assessments
- Ecology and Biodiversity
- Community Infrastructure Levy (CIL) and S106 Obligations

Principle of Development

6.2 Our pre-application engagement with Adur & Worthing Council identified that the redevelopment of the site for residential apartments potentially conflicts with The Railway Approach Office Area designation, which is covered by Local Plan Policy DM10 Economic Growth and Skills & DM11 Protecting and Enhancing Employment Sites.



The small application site is highlighted yellow on the north east periphery of the LP Proposals Map extract.

- Railway Stations
- Key Office Locations

6.3 Nevertheless, the opportunity for residential apartments on this site has potential as planning officers acknowledged the mixed use nature of the locality and stated that given a thorough assessment of the office market demand by the applicant a residential use may be acceptable. The conclusion of the council's written pre-application advice is set out below:

"The area is mixed in nature and as a presumption authority at this stage, residential use may be acceptable. However, the applicant would first need to demonstrate that there is no demand for additional office space as part of any redevelopment in this highly sustainable location next to the main Worthing train station on the edge of the town centre. In addition, careful consideration will need to be given as to the level of car parking needed by the existing office use to ensure that any proposals do not undermine the viability of the existing office

use. It is noted that this could create a conflict with design policies as outlined below”.

- 6.4 This application site is on the north eastern extremity of the Railway Approach Office Area designation adjacent to the Morrisons service yard and the Teville Gate local plan site allocation which has an indicative capacity for 250 residential units and 4000sqm of commercial uses. For some unknown reason neither the Morrisons service yard nor the Teville Gate redevelopment site sit within this Key Office location. To the southwest of the application site sits the imposing Teville Gate House with 70,000sqft of office space over 5 commercial floors. This relatively new office building is significantly underutilised and is presently sparsely occupied by the HMRC.
- 6.5 The current surface car park serves Capella House B1 office use and consists of 27 spaces. The proposal intends to retain 20 x B1 use parking spaces for Capella House in an under-croft beneath the apartment block. The retained parking will maintain the viability of the existing B1 offices, as requested by officers at the pre-application stage.
- 6.6 The site is located within the settlement of Worthing in a highly sustainable location adjacent to a public transport interchange. Local Plan Policy DM2 Density and the NPPF Para 124 require developments to make effective use of urban land, which is scarce resource and to maximise a high density. Taller buildings close to the town's railway station are to be encouraged on previously developed land such as this site.

Site Assessment and Market Report

- 6.7 At the pre-application stage the applicant provided a clear reflection of the Worthing office market based on the council's own Worthing Employment Land Review 2020 prepared by Lichfields. This report confirms the oversupply of office space and a weak office market in Worthing. This Employment Land Review 2020 still remains the council's most up to date

analysis of the Worthing office market. The findings of this report are laid out below:

The Council's most up-to-date Worthing Employment Land Review 2020 prepared by Lichfields confirms the oversupply of office space and a relatively weak office market. The existing car park will be retained for office use. The report's conclusions and policy recommendations:

- *There is an identified surplus of 5,810 sqm office space already in Worthing.*
- *These estimations are based on the assumption that all the allocated sites and extant planning permissions will be delivered within the plan period. This was further exacerbated by the covid pandemic and peoples changing habits about going to the office on a daily basis.*
- *The office market in Worthing is perceived to be relatively weak and more localised compared to other well-established office markets in the South Coast sub-region and in particular Brighton.*
- *A number of these premises have been redeveloped in recent years mainly through PDR, this trend has constrained the stock of office floorspace within the local market.*
- *The level of new office development in Worthing has been very limited over recent years, market intelligence suggests this trend will continue resulting in the inability of the local market to compete with other locations in the region and attract larger office occupiers.*
- *Development of new office space is most likely to come forward through mixed use schemes that offer the opportunity to overcome known viability issues through the financial return from higher value uses such as residential.*
- *In quantitative terms, it would appear that the Borough has enough office space in the development pipeline to meet future needs associated with all four growth scenarios considered by this study.*

Given the undisputable office surplus in Worthing, the changing work patterns post pandemic, the weak office market in Worthing confirmed by the Lichfields report and new office space coming forward via mixed use

schemes in the immediate locality, we believe a residential apartment block would be the most credible development solution for this underused yet highly sustainable site.

- 6.8 The council's pre-application advice was to provide with any future planning application analysis as to whether the site could be developed for office use including evidence relating to the current office market in Worthing. Although residential use may be acceptable, according to the council, the onus is on the applicant to demonstrate that there was no demand for additional offices.
- 6.9 In direct response to this pre-application advice the applicant commissioned a Site Assessment and Market Report prepared by Woods Chartered Surveyors dated June 2025, which accompanies this application. The purpose of this report is to assess the employment potential of the Site in light of its inclusion within the Railway Approach Office Area, a safeguarded employment designation under Policy DM11 of the Worthing Local Plan (2023). Specifically, Woods Surveyors have been asked to consider whether the site remains functionally and commercially aligned with the objectives of this policy, having regard to current market conditions, spatial constraints, and development viability. The findings and conclusions of this site assessment are as follows:
- This report has evaluated the subject site in the context of its current safeguarded status under Policy DM11 of the Worthing Local Plan (2023). Drawing upon detailed market research, planning policy analysis, and high-level development viability testing, we conclude that the site no longer presents a reasonable prospect of employment development in planning, economic, or commercial terms.
 - The Worthing office market has undergone significant structural contraction over the past decade, defined by a sharp decline in larger occupier demand, persistent SME-led leasing patterns, and extensive loss of office floorspace through permitted development rights. The town now functions as a small, localised market, largely driven by flexible workspace requirements below 2,000 sq ft. There is no identifiable active

demand for large floorplate space or speculative office schemes, and no new Grade A provision is currently under construction or planned.

- The subject site, while included within the DM11 boundary, contributes no existing employment floorspace and performs only an ancillary role to Capella House. Its physical characteristics, a constrained 0.09 ha footprint, back land position, lack of street presence, and requirement to retain undercroft parking, render it fundamentally unsuited to new employment development. There is no viable redevelopment format that aligns with market demand, tenant preference, or investor criteria.
- Our development appraisal tested the commercial viability of a notional five/six storey office scheme, assuming generous rents and institutional yields, which is not supported by the local market as detailed within the body of this report. Despite these optimistic inputs, the scheme returns a nominal developer profit which fails to meet minimum return thresholds by a long way. A mixed-use variant similarly proved unviable due to design inefficiencies and the poor performance of the commercial component. These results confirm that no financially credible office employment scheme can be delivered under prevailing conditions.
- While other schemes within a 1km radius may bring forward modest volumes of Class E floorspace, none are located within DM11 or comprise dedicated employment land. The absence of any deliverable pipeline within the designated area, alongside the market's continued shift toward flexible, mixed-use formats, strongly suggests that rigid protection of marginal sites no longer serves a strategic planning purpose.
- In our opinion the continued designation of the subject site under DM11 is neither functionally justified nor commercially defensible. It risks sterilising land that could be more productively used to meet identified local priorities, such as housing or town centre regeneration. The release of the site from its employment allocation is therefore considered both appropriate and necessary to ensure the Local Plan remains flexible, responsive, and evidence led.

- 6.10 It is evident from the in-depth and comprehensive site assessment and office market report prepared by Woods Surveyors dated June 2025 that the application site is not commercially viable to be developed for B1 office use. The weak office market and oversupply of office space in Worthing confirms that no financially credible office scheme can be delivered on this site in these market conditions. The Woods Surveyors report states categorically that the designation of this small site within the confines of Policy DM11 is neither functionally justified nor commercially defensible. The council risk sterilising this site with this office use designation, whereas it could be better used for other pressing local needs like Use Class C3 housing delivery, located within an area the council officers consider to be mixed use in nature.

Heritage Assessment

- 6.11 The application site is adjacent to the original Railway Station building which is a Grade II listed building and deemed a heritage asset. Local Plan Policy DM5 requires that all development meet the criteria in the policy including that it be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area.
- 6.12 In response to the pre-application feedback relating to the overbearingness of the apartment block on the adjacent Listed Building, the proposal has been amended to lower the height closest to the former station building and still maintain height on the eastern portion of the site (as suggested by officers). The proposal now steps up from four residential floors adjacent to the listed building to six floors towards the east of the side.
- 6.13 In accordance with the pre-application advice received from the council this application is supported by a Heritage Statement prepared by ECE Planning dated October 2025. This Statement provides the relevant background to the site, including a description of the site and its surroundings and an assessment of the heritage significance and potential impact of the proposed development on the historic environment, in line with national and local

planning policy. The conclusions of the ECE Planning Heritage Statement are as follows:

- This Heritage Statement has considered the potential impact of the proposed development at Land at 4 Railway Approach, Worthing, on nearby designated heritage assets in line with Historic England's The Setting of Heritage Assets guidance (GPA3) and the requirements of the NPPF.
- The assessment confirms that the application site itself contains no designated or non-designated heritage assets and is not located within a Conservation Area. However, the scheme seeks to connect directly to the Grade II listed Original Worthing Railway Station, and a further designated heritage asset, the Grade II listed Grand Victorian Hotel, is also located within the vicinity.
- The Grand Victorian Hotel is visually and spatially separate from the application site. The development has limited invisibility or functional relationship with the hotel, and its heritage significance will remain unaffected.
- The Original Worthing Railway Station is directly adjacent to the application site, and its setting currently includes a neutral-to-negative contribution from the car park. The proposed development has been carefully designed to respond to this context. Through the use of sympathetic materials, stepped massing, and architectural articulation, the scheme complements the listed station while ensuring a clear distinction between historic and new. The cycle store element involves direct attachment to the east elevation of the station and the blocking-up of existing windows. While this results in a modest loss of historic fabric, the harm is limited to a secondary façade and mitigated by the restrained, matching design.
- While the introduction of a taller built form does result in a low level of less than substantial harm, this is mitigated through design quality and

outweighed by the benefits of the scheme. These include the removal of a detracting car park, reinstatement of a coherent urban frontage, retention of mature trees that positively frame the station, and improved legibility of the heritage asset within its setting.

- Beyond heritage considerations, the scheme delivers clear public benefits. brings forward a high-quality residential development in a sustainable town centre location, on a previously developed brownfield site, helping to meet local housing needs including the provision of affordable homes and supporting wider regeneration objectives.
- In this context, the proposals strike an appropriate balance between heritage conservation and town centre growth. The scheme sustains the significance of the Grand Victorian Hotel and carefully manages the impact on the Original Worthing Railway Station, ensuring that despite the blocked windows, the building's overall heritage value remains legible.
- It is therefore concluded that the proposed development accords with the NPPF and GPA3, conserving heritage assets in a manner appropriate to their significance whilst also providing wider social, economic, and environmental benefits

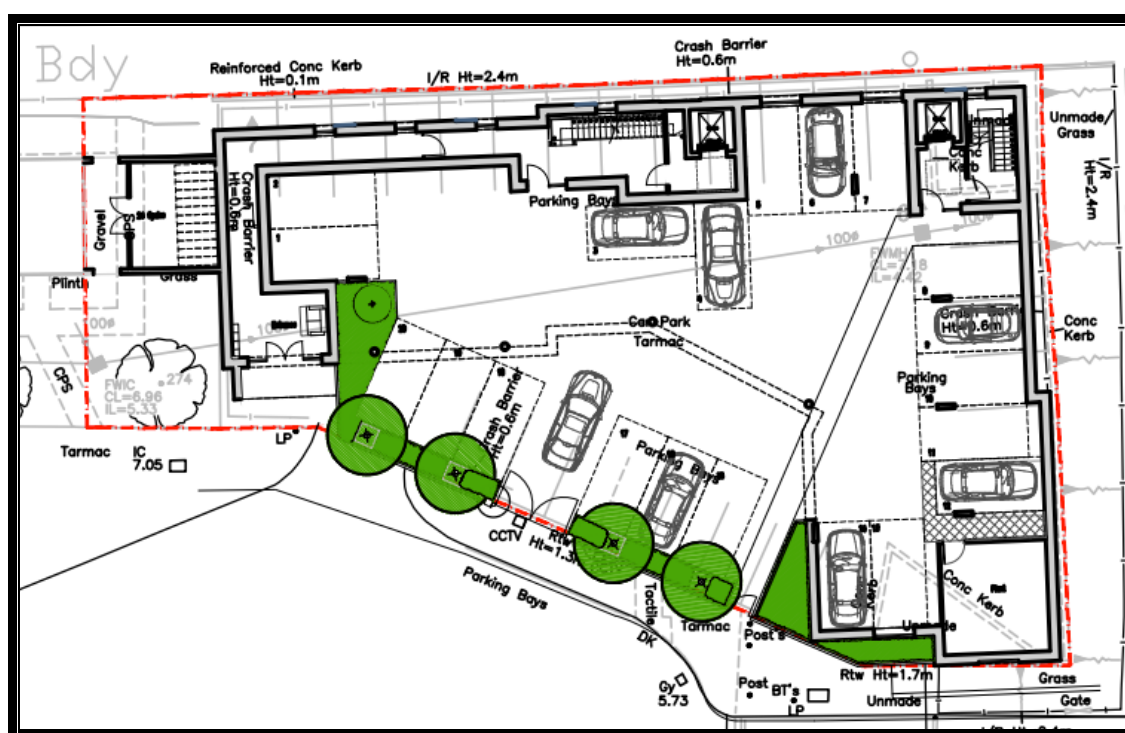
6.14 It is considered that the proposal strikes a balance between heritage conservation and town centre growth and ensures the former station building's overall heritage value remains legible. The proposal is considered to accord with Local Plan Policy DM24 The Historic Environment, Historic England's Setting of Heritage Assets GPA3 and the requirements of the NPPF.

Design and Appearance

6.15 Details of access, appearance, landscaping, layout and scale are set out in the accompanying Design and Access Statement (DAS) prepared by Architectus. The Design and Access Statement explains in detail the schemes compliance with the council's SPD: Guide to Residential

Development (2013), Space Standards SPD (2012) and the adopted Local Plan Policy for Worthing Borough Council.

- 6.16 The layout drawing extract below shows the development taken from Railway Approach to the south, with the new access lying centrally to the plot leading to an undercroft parking area which includes 20 spaces reserved for the office use at Capella House. The new apartment block is staggered in height from between 4 and 6 storeys located on top of undercroft parking. The 29 proposed apartments includes 18 x 1 beds and 11 x 2 beds and 20% affordable housing which equates to six apartments.



Extract of the proposed site layout drawing, showing the vehicular access taken from Railway Approach and the undercroft parking providing 20 spaces associated with nearby Capella House office use.

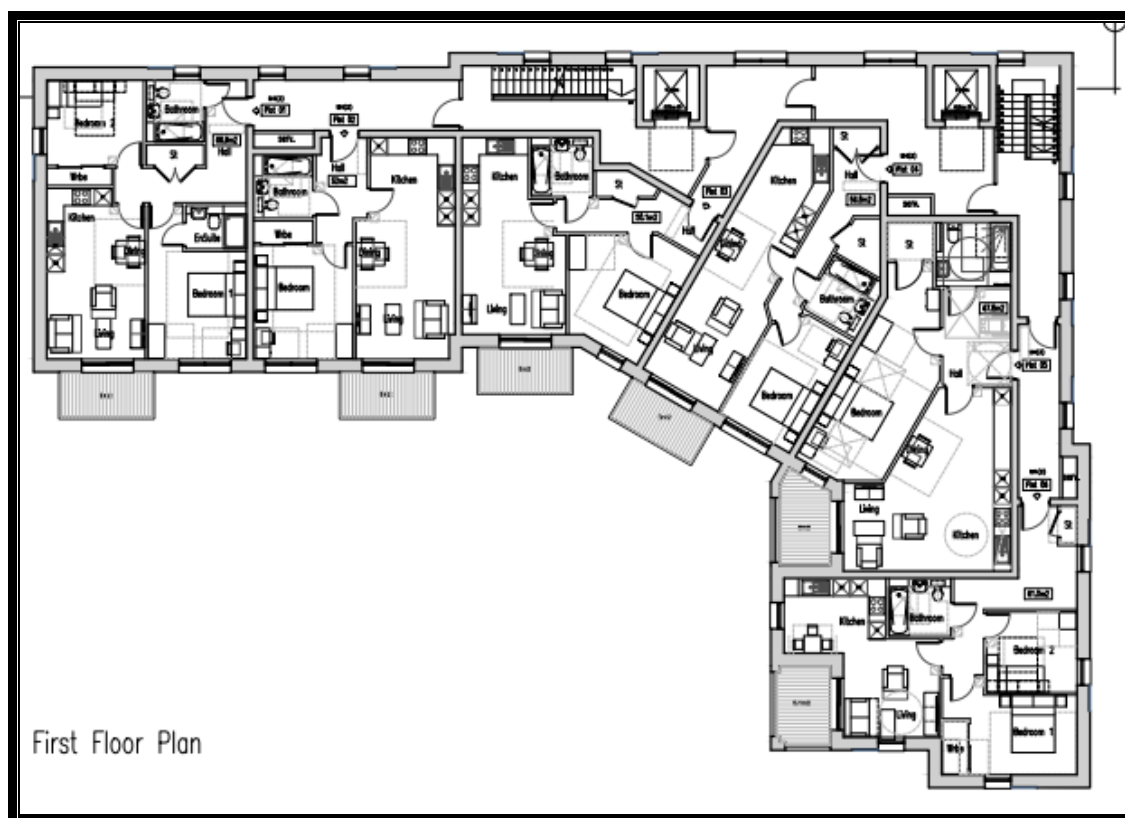
- 6.17 The development of 29 No. Apartments on a site area of 0.0876 hectares results in a required high density which is appropriate given the proposed character of the surrounding area and the need to make best use of urban land. The NPPF encourages high density and taller buildings to be located in close proximity to public transport interchanges.



Extract of apartment block elevations showing the proposed south, west, north and east elevation.



An elevated view of the proposed apartment block at the end of Railway Approach looking east from Teville Gate House occupied by HMRC.



Extract of the first-floor plan showing internal layout plans for six apartments consisting of 4 x 1 beds and 2 x 2 beds served by two stair cores and two lifts. Each apartment benefits from its own private balcony.

- 6.18 Worthing Borough Council Local Plan Policy DM5 Quality of the Built Environment requires development to be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area. Policy DM24 The Historic Environment states that where any development affecting any designated or undesignated heritage asset is permitted, it must be of a high quality, respecting its context and demonstrating a strong sense of place. The Worthing BC SPD: Guide to Residential Development (2013) offers guidance on appropriate character, layout, siting, scale, height, massing, appearance, details, materials and landscaping and these are expressed fully in the accompanying Design and Access Statement (DAS) by Architectus. A drawing in the DAS illustrates clearly the storey heights proposed across the site and their appropriateness to the character of the area.



3D model as to how the proposed contemporary apartment block would appear in Railway Approach.



The apartment block was amended after our pre-application engagement with the council to step away from the former Station building which is Grade II listed. The dotted line above this street scene demonstrates the height of the modern HMRC office building opposite which dominates Railway Approach.

- 6.19 This residential development comprises a mix of apartments ranging from 1 bedroom to 2 bedroom flats, which contributes to the requirement of Local

Plan Policy DM1: Housing Mix. The dwelling mix can be summarised as follows:

Overall Mix of 29 Apartments is as follows:

- 18 No. 1 Bedroom Apartments (1bed/2 person)
- 11 No. 2 Bedroom Apartments (2bed/3 pers x 10 & 2bed/4 pers x 1)

6.20 In terms of Policy DM1 Housing Mix, the Council will expect all new build dwellings to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings unless it can be demonstrated that this would be impractical, unachievable or unviable. The proposal ensures that all the 29 proposed apartments are M4(2) compliant and one affordable apartment will be M4(3) wheelchair accessible which represents 3% of the affordable provision in accordance of Policy DM3 (d) Affordable Housing.

6.21 The design details and layout submitted with this full planning application accord with Local Plan Policy and the Council's SPD: Guide to Residential Development (2013). Please refer to the submitted Architectus Planning Block Plan & Layout Drawings 21/014/002 PL01 & 21/014/003 PL01 and 21/014/004 PL01 to 21/014/012 PL01 plans and elevations.

Affordable Housing

6.22 Local Plan Policy DM3 Affordable Housing requires all new residential developments over 10 units to provide an appropriate mix of affordable housing. Section a) i) states that on previously developed land involving the development of flats there will be a requirement for 20% affordable housing. c) Affordable housing should incorporate a mix of tenures and sizes prioritising rented affordable homes at social rent levels. d) A minimum of 3% of affordable homes constructed should be built to Building Regulation Standard M4(3) wheelchair accessible standards.

6.23 In accordance with Local Plan Policy DM3 six apartments will be provided as affordable housing. These will consist of 4 x 1 beds and 2 x 2 beds apartments including 1 x M4(3) unit, on plots 4, 5, 6, 10, 11 & 12 which meets the council's 20% affordable policy requirement.

- Plot 4 – 1 bed/2 person apartment
- Plot 5 – 1 bed/2 person apartment
- Plot 6 - 2 bed/3 person apartment
- Plot 10 – 1 bed/2 person apartment
- Plot 11 – 1 bed/2 person apartment
- Plot 12 – 2 bed/3 person apartment

Trees and Landscaping

6.24 The application site contains a solitary tree which is a Sycamore located in the southwest corner of the application site. The details of the retained tree are as follows: 6m high, with 4m spread and 0.15 Bole diameter.

6.25 A Tree Protection Plan for this Sycamore has been added to the proposed landscaping layout drawing prepared by Architectus to ensure its long-term survival for the benefit of the street scene in Railway Approach.

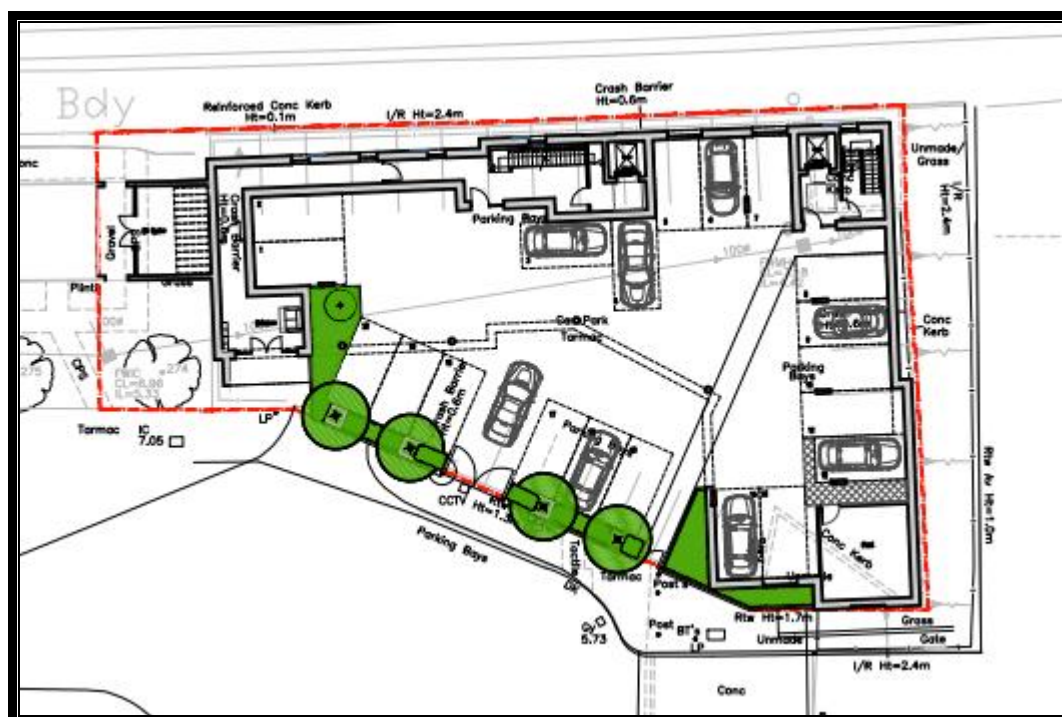


Extract of the proposed Landscape Layout Plan 24/014/014 P01 prepared by Architectus with the existing Sycamore tree highlight in the southwest corner.

- 6.26 The Landscape Proposals Plan 24/014/014 P01 prepared by Architectus shows proposals for the provision of four street trees (Sorbus Intermedia 'Brouwers') and hedgerows (Pyracantha & Fagus Sylvatica Beech) to help soften up the appearance of the street scene along Railway Approach.
- 6.27 It is considered that the proposal to retain the existing Sycamore tree in the southwest corner of the site and the proposal for landscaping and tree planting, which can be controlled by a planning condition will satisfy the Worthing Local Plan Policy DM6 Public Realm by enhancing the Railway Approach street scene and Policy DM19 Green Infrastructure as the proposal takes the opportunity to incorporate elements of green infrastructure onsite to create, protect, enhance and manage green infrastructure assets and/or networks to achieve environmental net gain.

Access and Parking

- 6.28 A new vehicular and pedestrian access will be created along Railway Approach to serve the development. The 20 car parking spaces within the undercroft area will be retained for existing office parking associated with Capella House, to maintain its economic viability. The 29 new apartments will be provided as car free, which is wholly appropriate given the highly sustainable location adjacent to this public transport interchange, with excellent opportunities for walking and cycling.
- 6.29 The application site can be accessed by sustainable modes of transport such as walking, cycling, bus, and train, with a railway station located on the same road and within close walking distance. Local bus services operate at a high frequency throughout the day, providing connections to nearby destinations. Vehicular access for the site will be via Railway Approach.



Extract of the proposed site plan showing the new vehicular and pedestrian access to the site formed from Railway Approach. The 20 car parking spaces within the undercroft area will be retained for existing office parking and the proposed 29 apartments will remain car free, given its highly sustainable location.

6.30 Cycle parking provision will be based on the standards set out in the WSCC Guidance on Parking at New Developments (September 2020), which recommends 0.5 spaces per flat where communal storage is provided. For the proposed 29 flats, this equates to a minimum requirement of 15 cycle parking spaces. The site layout proposes a communal store accommodating 16 cycles which exceeds this minimum requirement and supports sustainable travel and accommodates future potential increase in demand.

6.31 This full planning application is supported by a Transport Statement and Travel Plan prepared by GTA highway consultants, which accompanies this application. The highway design drawing pack within the Transport Statement October 2025 includes the following drawings:

- Site Plan
- Swept Path Analysis Drawing
- TRICS Output Data

The GTA Transport Statement summary and conclusions are as follows:

- This Transport Statement has summarised the existing situation and has provided an overview of the proposed development from a transport perspective.
- Key transport-relevant elements of the development, including parking, access, trip generation and the impacts upon the surrounding transport networks, have been considered.
- The proposal is for the redevelopment of the existing car park at the end of Station Approach to provide 29 residential flats as a car-free scheme. Located on the same road as Worthing railway station and just a short walk away, the site benefits from very good public transport accessibility, frequent bus services, and walking and cycling connections to a full range of local amenities. This highly sustainable location supports a car free lifestyle. The development will not generate significant vehicle trips, and secure cycle parking will be provided to promote active travel.
- Access to the site is via Railway Approach.
- Using the detailed TRICS database, the development is likely to result in approximately 7 two-way trips in the peak AM period (0800-0900) and 6 two-way trips in the peak PM period (1700-1800).
- The estimated level of trips generated by the development can easily be accommodated on the surrounding highway network.
- In conclusion, there are no unacceptable highway or transport impacts as a result of the proposed development.

6.32 The application is also supported by a Travel Plan prepared by GTA highway consultants dated October 2025. This Travel Plan Statement outlines a strategy of targets and measures aimed at promoting sustainable travel

choices, with a particular focus on supporting the car-free nature of the proposed development. The conclusions of the Travel Plan are set out below:

- This Travel Plan has set out a plan of targets and measures to encourage sustainable travel, with an emphasis on encouraging a car-free development.
- The primary objectives of the travel plan are to help and encourage residents to achieve the following:
 - To encourage a modal shift to active modes such as walking and cycling;
 - To increase resident awareness of the advantages and availability of sustainable/active modes of transport;
 - To promote the health and fitness benefits of active travel to all users; and;
 - To introduce a package of physical and management measures that will facilitate resident travel by sustainable modes.
- Travel information will be available to all new residents to maximise awareness of the transport modes available to them and what facilities are available in the local area.

6.33 It is considered that the proposals are in accordance with current policies and guidance provided by West Sussex County Council and are compliant with national guidance documents such as Manual for Streets (MfS). The proposals are also in accordance with the Department for Communities and Local Government's National Planning Policy Framework 2025 (NPPF).

Flood Risk and Drainage Strategy

6.34 As requested at the pre-application stage a Flood Risk Assessment and Drainage Strategy accompany this full planning application prepared by GTA Consulting Engineers. The conclusions of the FRA & Drainage Strategy prepared by GTA Consulting Engineers reads as follows:

- The site lies entirely within Flood Zone 1 and flood risks from other sources are negligible. The development is therefore appropriate in terms of flood risk.
- The proposed SuDS strategy has been developed in line with Defra's National standards for SuDS. The strategy includes on-plot source control, in the form of green roofs and permeable paving, and an attenuated discharge to the existing surface water network. This is a significant improvement over the existing site condition, which drains unrestricted and untreated to the downstream network.
- A new foul connection to the existing Southern Water sewer will be required, to the east of the site. There is an existing private drainage route to the sewer network from the adjacent Sandell House, crossing the site, which will be utilised for this purpose. Any off site upgrades required to serve the development will be delivered by Southern Water post-planning funded by its Infrastructure Charges.
- The development complies with the NPPF and relevant planning practice guidance in terms of flood risk. The proposed SuDS and foul drainage strategies comply with the Local Plan Policies.

6.35 It is considered that the details contained in the submitted GTA Flood Risk Assessment & Drainage Strategy demonstrate that the site is within Flood Zone 1 with a very low risk of flooding and the strategy for surface & foul water drainage is appropriate. It is considered that the proposal accords with the provisions of Local Plan Policy DM20 Flood Risk and Sustainable Drainage and Policy DM21 water Quality and Sustainable Water Use.

Energy and Sustainability

6.36 In accordance with the pre-application advice request received this application is supported by an Energy & Sustainability Statement prepared by Southern Energy Consultants dated October 2025. This report was

commissioned as part of a comprehensive analysis of the sustainability credentials for the proposed development at this site. The report considers emissions baselines, energy efficiency proposals, renewable energy technologies, layout, access, landscaping, proposed materials, noise, dust, recycling, waste, water use, SAP calculations and includes a climate change and sustainability checklist in Appendix 2. The conclusions of the Energy & Sustainability Statement are as follows:

- This Energy and Sustainability Statement has set out the Applicant's detailed energy and sustainability strategy pertaining to the Proposed Development at the Railway Approach, Worthing. The Applicant intends to deliver a sustainable development of 29 dwellings by providing a range of apartments suitable for individuals of all ages – from first-time buyers to small families. The design of the new apartments will reflect the character of other developments in the local area.
- The sustainability strategy has been developed to comply in full with the planning policy requirements of the NPPF (2024), and Worthing Borough Council's Local Plan (2023), and Planning and Climate Change Supplementary Planning Document (2023). The focus of the sustainable energy strategy has been to first reduce energy consumption at the point of demand by introducing a robust fabric specification and efficient heating and ventilation systems. Secondly, a low carbon energy generating technology, in the form of IHP ASHPs will be provided in each dwelling, which is projected to deliver site-wide carbon dioxide emissions reductions of 63.2% lower than current regulatory standards. The fully electric Proposed Development constitutes 'zero carbon readiness'.
- In addition, the following sustainable design measures will be adopted:
 - Water efficient sanitary devices will be installed to meet a target for internal potable water; consumption of not more than 110 litres per person per day;

- Sustainable Urban Drainage Systems will be specified in the form of a green roof, which will also support local biodiversity; Security in dwellings will be incorporated under Part Q of the Building Regulations, helping to reduce the fear and incidence of crime in the new community.
- Cycle storage facilities and a Travel Plan will be developed, helping to encourage the use of sustainable forms of transportation over the private car.
- Priority will be given to the selection of materials with very low lifecycle impacts according to the BRE's Green Guide;
- All timber used in the development will be from sustainable sources.
- Waste streams will be identified, reduced and re-used wherever practicable.

6.37 It is considered that the sustainability strategy has been developed to comply in full with the planning policy requirements of the NPPF (2024), and Worthing Borough Council's Local Plan (2023), and Planning and Climate Change Supplementary Planning Document (2023).

Air Quality Assessment

6.38 In accordance with the pre-application advice request received this application is supported by an Air Quality Assessment prepared by Cass Allen dated July 2025. Cass Allen has been instructed by Architectus to assess the potential air quality effects associated with a proposed residential development at the Capella House car park in Worthing. The assessment was carried out with regard to relevant local and national planning policy and guidance. The conclusions of the air quality assessment are as follows and confirm that there are no identified air quality constraints applicable to this site:

- Potential construction phase dust soiling and PM10 health effects were assessed qualitatively, resulting in Medium and Low Risk levels being identified, respectively, in the absence of mitigation. Suitable best practice mitigation measures have been recommended, and no significant residual air quality impacts are expected.
- It is not anticipated that the development would expose future residents to pollutant concentrations exceeding, or close to, the relevant AQOs. Furthermore, construction and operational phase generated vehicle movements are not expected exceed the relevant EPUK & IAQM LUPDC guidance screening thresholds, and therefore, an overall 'not significant' effect is anticipated, with no requirement for further assessment or additional mitigation measures.
- In summary, it is our view that the site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent.

6.39 The proposal accords with Local Plan Policy SP3 Health Communities and DM22 Pollution which requires, where appropriate, air quality assessments to be prepared and submitted in support of planning applications.

Sunlight & Daylight Assessments

6.40 The pre-application advice received from the council requested a Daylight and Sunlight Assessment for existing and proposed residents for the sake of validation. The application is first supported by a Daylight, Sunlight & Overshadowing Assessment prepared by Blackacre dated August 2025 which assessed the impact on existing surrounding buildings in respect of daylight, sunlight and overshadowing of external amenity spaces. The summary conclusions of this assessment are as follows:

- This assessment has been prepared to analyse the impact to Daylighting and Sunlighting values to the windows, rooms and external amenity spaces, of the surrounding properties following the proposed development of the at the car park, Railway Approach, Worthing BN11 1UR.
- The analysis has been carried out in accordance with the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BRE 209). The British Standard on which this guidance is based is BS 8206-2:1992 – Lighting for buildings. Code of practice for daylighting.
- The assessment demonstrates that the proposed development will have no adverse impact on the daylight and sunlight levels of surrounding properties, with all tested windows and habitable rooms meeting the relevant BRE guidelines.
- The Vertical Sky Component (VSC) methodology was applied to a total of 21 windows surrounding the subject property. Results confirm that 100% of these windows comply with the BRE 209 guidance and satisfy its criteria.
- Further daylighting assessment was undertaken using the No-Sky Line (NSL) methodology, applied to 21 rooms within the surrounding properties. Results show that 100% of these rooms satisfy the BRE 209 guidance, demonstrating that there will be negligible impact on daylighting values as a result of the development.
- Sunlighting levels to 21 surrounding windows were analysed using the Annual Probable Sunlight Hours (APSH) methodology. Results confirm that 100% of these windows comply with the BRE 209 guidance, indicating that the proposed development will have very little impact on sunlight availability.

- In addition, the amenity spaces of adjoining properties are not within an impactable distance of the proposed scheme and will therefore remain entirely unaffected by the development.
- The proposed scheme is fully compliant with BRE guidelines.

6.41 The assessment demonstrates that the proposed development will have no adverse impact on the daylight and sunlight levels of surrounding properties and furthermore the amenity spaces of adjoining properties are not within an impactable distance of the proposed scheme. The proposal is therefore considered to be compliant with BRE guidelines and accord with Local Plan Policy DM5 (viii) Quality of the Built Environment which is there to ensure developments do not have an unacceptable impact of occupiers of adjacent properties.

6.42 In addition, a Daylight & Sunlight Self-Test Assessment has been prepared by Blackacre in support of this application which assesses the daylight and sunlight achieved for future occupiers of the proposed 29 apartments. The conclusions demonstrate strong compliance with BRE standards and are as follows:

- We have conducted a Daylight and Sunlight self-assessment for the proposed development at Railway approach, on behalf of Architectus Ltd.
- Our analysis employed the Spatial Daylight Autonomy (SDA) methodology, in line with the standards outlined in the Building Research Establishment (BRE) guidance. The assessment demonstrates that the redevelopment, comprising 69 habitable spaces, achieves a high and favourable pass rate (83%), indicating sufficient daylight provision across the development.
- While the majority of spaces exhibit above-adequate daylight performance, as anticipated, a few spaces located in parts of the proposed structure that are self-obstructing in nature experience

reduced daylight levels, primarily due to the building's configuration, which inherently limits daylight penetration to these specific areas. This is an expected outcome for a development in an urban location.

- Using the Sunlight Exposure methodology, we evaluated sunlight availability. Our findings indicate that 70% of rooms with a primary window facing within 90° of south easily meet the standards prescribed in the BRE guidance. We conclude that the overall sunlight provision across the proposed scheme is satisfactory, with good sunlighting levels observed.
- In summary, the proposed development at Railway Approach demonstrates strong compliance with BRE standards for both daylight and sunlight. Despite minor daylight limitations in specific areas due to the building's configuration constraints, we are confident that the development will provide adequate natural light, ensuring a comfortable and well lit living environment.

Ecology and Biodiversity

- 6.43 Local Plan Policy DM18 Biodiversity: Planning applications should be supported by relevant environmental information, which is informed by appropriate up-to-date ecological information, prior to determination. The need for a Biodiversity net gain matrix and assessment was listed as a requirement in the council's pre-application response letter.
- 6.44 This application is supported by a Biodiversity Gain Statement, prepared by Lizard Ecology which confirms the proposal does not impact a priority habitat and shall impact less than 25sqm of on-site habitat with a score greater than zero, or 5 metres of linear habitats such as hedgerows. Therefore, the proposed development is exempt from mandatory biodiversity net gain under the de minimis exemption detailed within The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The conclusions of the Preliminary Ecological Appraisal prepared by Lizard Ecology dated July 2025 are as follows:

- The site covers an area of 0.08 ha and is located immediately south of Worthing Central Station, Platform 3. The site consists of a 27-space hardstanding car park with a section of grassland to the east and two areas of loose gravel within the northwest and southwest corners. Surrounding the site was a landscape of commercial and residential properties which lies between the South Downs to the north, and the coast to the south. The greatest ecological interest at the site is associated with the individual tree, which should be retained and protected throughout proposals, wherever practicable.
- The habitats within and adjacent to the site were found suitable to support foraging / commuting bats, birds and minor invertebrate assemblages. Due to the overall low value of the site, further surveys have been ruled out under the condition that appropriate RAMs are incorporated into the scheme. As the presence, or potential presence, of protected species is a material consideration in the planning process, these surveys shall need to be undertaken before determination of the planning application.
- Proposals have negligible potential to impact any statutory designations identified within a potential zone of influence of development. Therefore, further assessment in regard to the Habitat Regulations (2017) or site specific mitigation would not be required.
- Opportunities for ecological enhancement have been provided to allow the ecological value of the site to be maximised. However, the development is subject to the de minimis exemption and is not required to demonstrate Biodiversity Net Gain; a statement evidencing this exemption will be produced in place of the standard Biodiversity Net Gain report.
- Subject to a sensitively designed scheme, which gives due consideration to the survey and mitigation requirements outlined herein, no major ecological constraints have been identified which would preclude the

provision of a well-designed development.

- 6.45 It is considered that the proposal with its ecological enhancements and de minimis biodiversity net gain requirements will meet with the provisions of Local Plan Policy SP2(f) Climate Change, Policy DM5 Quality of the Built Environment & Policy DM18 Biodiversity.

Community Infrastructure Levy (CIL) and S106 Obligations

- 6.46 The Local Plan Policy DM8 (d) Planning for Sustainable Communities/Community Facilities states that the council will seek planning obligations to secure new and improved community facilities and services to mitigate the impacts of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy.
- 6.47 Worthing Borough Council Community Infrastructure Levy dates from 1st August 2021, which is prepared in accordance with the CIL Regulations 2010. CIL is payable on development which creates new or additional floor space where the gross internal area is 100sq. m. or more, or where an additional dwelling is created. As of 2025 the CIL charge rate was £29.35 per square metre for a flatted development of more than 10 dwellings.

Development Type	2021 Charging Schedule Levy (£/m²)	2022 Indexed Rate (£/m²)	2023 Indexed Rate (£/m²)	2024 Indexed Rate (£/m²)	2025 Indexed Rate (£/m²)
Residential* - 10 dwellings or less (all dwelling types)	£125.00	£124.62	£133.26	£143.02	£146.77
Residential - More than 10 dwellings (excluding Flatted development)	£125.00	£124.62	£133.26	£143.02	£146.77
Residential - Flatted development of more than 10 dwellings	£25.00	£24.92	£26.65	£28.60	£29.35

- 6.48 The contributions may be sought to attempt to mitigate the impact on existing infrastructure. When a planning application is submitted, the amount the scheme would contribute and to which project will be determined on the basis of the development submitted and calculated once an application is submitted. According to the Worthing Borough Council Developer Contributions SPD 2015 the common contributions that may be sought, but not limited to, may include Transport, Flood Risk, Open Space/Play Space, Health Facilities, Crime Prevention, Education and Green Infrastructure.

7.0 CONCLUSIONS

- 7.1 It is evident from the in-depth and comprehensive site assessment and office market report prepared by Woods Surveyors dated June 2025 that the application site is not commercially viable to be developed for B1 office use. The weak office market and oversupply of office space in Worthing confirms that no financially credible office scheme can be delivered on this site in these market conditions. The Woods Surveyors report states categorically that the designation of this small site within the confines of Policy DM11 is neither functionally justified nor commercially defensible. The council risk sterilising this site with this office use designation, whereas it could be better used for other pressing local needs like Use Class C3 housing delivery, located within an area the council officers consider to be mixed use in nature.
- 7.2 It is considered that the proposal strikes a balance between heritage conservation and town centre growth and ensures the former station building's overall heritage value remains legible. The proposal is considered to accord with Local Plan Policy DM24 The Historic Environment, Historic England's Setting of Heritage Assets GPA3 and the requirements of the NPPF.
- 7.3 In terms of Policy DM1 Housing Mix, the Council will expect all new build dwellings to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings unless it can be demonstrated that this would be impractical, unachievable or unviable. The proposal ensures that all

the 29 proposed apartments are M4(2) compliant and one affordable apartment will be M4(3) wheelchair accessible which represents 3% of the affordable provision in accordance of Policy DM3 (d) Affordable Housing.

- 7.4 In accordance with Local Plan Policy DM3 six apartments will be provided as affordable housing. These will consist of 4 x 1 beds and 2 x 2 beds apartments including 1 x M4(3) unit, on plots 4, 5, 6, 10, 11 & 12 which meets the council's 20% affordable policy requirement.
- 7.5 A new vehicular and pedestrian access will be created along Railway Approach to serve the development. The 20 car parking spaces within the undercroft area will be retained for existing office parking associated with Capella House, to maintain its economic viability. The 29 new apartments will be provided as car free, which is wholly appropriate given the highly sustainable location adjacent to this public transport interchange, with excellent opportunities for walking and cycling.
- 7.6 Cycle parking provision will be based on the standards set out in the WSCC Guidance on Parking at New Developments (September 2020), which recommends 0.5 spaces per flat where communal storage is provided. For the proposed 29 flats, this equates to a minimum requirement of 15 cycle parking spaces. The site layout proposes a communal store accommodating 16 cycles which exceeds this minimum requirement and supports sustainable travel and accommodates future potential increase in demand.
- 7.7 As requested at the pre-application stage a Flood Risk and Drainage Strategy accompany this full planning application prepared by GTA Consulting Engineers. It is considered that the details contained in the submitted GTA Flood Risk Assessment & Drainage Strategy demonstrate that the site is within Flood Zone 1 with a very low risk of flooding and the strategy for surface & foul water drainage is appropriate. It is considered that the proposal accords with the provisions of Local Plan Policy DM20 Flood Risk and Sustainable Drainage and Policy DM21 water Quality and Sustainable Water Use.

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- 7.8 The submitted Energy & Sustainability Statement was commissioned as part of a comprehensive analysis of the sustainability credentials for the proposed development at this site. The report considers emissions baselines, energy efficiency proposals, renewable energy technologies, layout, access, landscaping, proposed materials, noise, dust, recycling, waste, water use, SAP calculations and includes a climate change and sustainability checklist in Appendix 2. It is considered that the sustainability strategy has been developed to comply fully with the planning policy requirements of the NPPF (2024), and Worthing Borough Council's Local Plan (2023), and Planning and Climate Change Supplementary Planning Document (2023).
- 7.9 The Sunlight and Daylight Assessments demonstrates that the proposed development will have no adverse impact on the daylight and sunlight levels of surrounding properties, for future occupiers and furthermore the amenity spaces of adjoining properties are not within an impactable distance of the proposed scheme. The proposal is therefore considered to be compliant with BRE guidelines and accord with Local Plan Policy DM5 (viii) Quality of the Built Environment which is there to ensure developments do not have an unacceptable impact of occupiers of adjacent properties.
- 7.10 The application is supported by an Air Quality Assessment prepared by Cass Allen dated July 2025. The report confirms that the site is suitable for the development in terms of air quality and that there are no air quality constraints with respect to planning consent. The proposal is considered to accords with Local Plan Policy SP3 Health Communities and DM22 Pollution.
- 7.11 This application is supported by a Biodiversity Gain Statement, prepared by Lizard Ecology which confirms the proposed development is exempt from mandatory biodiversity net gain under the de minimis exemption detailed within The Biodiversity Gain Requirements (Exemptions) Regulations 2024. It is considered that the proposal with its ecological enhancements and de minimis biodiversity net gain requirements will meet with the provisions of Local Plan Policy SP2(f) Climate Change, Policy DM5 Quality of the Built Environment & Policy DM18 Biodiversity.

The proposal makes best use of urban & highly sustainable land and unlocks the site potential for residential development. The current office policy designation in the local plan sterilises this small site at the periphery of the allocation area, as its not commercially viable to bring forward office floor space in such a weak local market when there is an oversupply of office space available in Worthing. By contrast the residential proposal will deliver much needed housing in Worthing including 20% affordable provision within this mixed-use environment. The scale, design and chosen materials for the proposed apartment block are considered appropriate to this urban location and has been designed sympathetically to accommodate the adjacent Listed former station building.