

Your ref: **PP- 14415079**

Our ref: ML/ Capella House Car Park

Adur & Worthing Councils,
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17 October 2025

Dear Louise Prew,

Erection of a four to six storey apartment block, consisting of 29 x 1 & 2 bedroom residential apartments, over an undercroft parking area and cycle store linking to adjoining Listed Building. Capella House car park, Railway Approach, Worthing, West Sussex.

Further to our pre-application engagement with you and your formal pre-app response on 23 August 2024 (PREAPP/0244/24) we have been working hard to amend the proposal and provide a suite of consultant reports including a comprehensive site assessment and office market report. I have the pleasure of submitting this full planning and Listed Building application for the erection of 29 apartments on the Capella House car park site, Railway Approach, Worthing, West Sussex.

This planning submission is made on behalf of the Capella Partnership.

The application contains the following drawings and documents

(Planning Portal Ref: PP- 14415079):

- Signed and dated planning application forms via the Planning Portal;
- Planning application fee of £18,500.00 paid to the Planning Portal;
- 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.

NB: No Noise Impact Assessment has been included as no plant is proposed to make a noise.

Architectus Drawings

Location Plan 1:1250	A3	24/014/001		PL01
Block Plan 1:500	A2	21/014/002		PL01
Site Layout Plan 1:200	A1	21/014/003		PL01
Ground Floor Plan 1:100	A1	21/014/004		PL01
First & Second Floor Plan 1:100	A1	21/014/005		PL01
Third & Fourth Floor Plan 1:100	A1	21/014/006		PL01
Fifth & Six Floor Plan 1:100	A1	21/014/007		PL01
Roof Plan 1:100	A1	21/014/008		PL01
Section A-A 1:100	A1	21/014/009		PL01
South & East Elevations 1:100	A1	21/014/010		PL01
North & West Elevations 1:100	A1	21/014/011		PL01
Street Elevations 1:200	A1	21/014/012		PL01
Site Section 1:200	A1	21/014/013		PL01
Landscape Drawing 1:200	A1	21/014/014		PL01
Station House Existing 1:100	A3	21/014/015		PL01
Design Statement	A3	21/014/016		PL01

In view of the scheme's accordance with adopted council policy & guidance we believe this planning submission should be approved for the following reasons:-

- 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.

- 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.
- 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.
- 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.
- 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.
- 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.

- 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.
- 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).
- 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.
- 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.
- 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

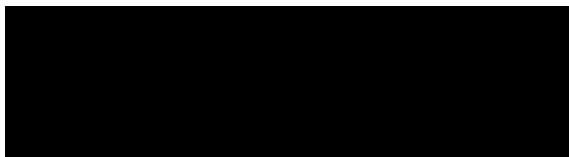
provisions of Local Plan Policy SP2(f) Climate Change, Policy DM5 Quality of the Built Environment & Policy DM18 Biodiversity.

- 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.

We trust you will find the enclosures in order and look forward to the registration of the application in due course and working with Officers and Members to achieve a planning approval in the near future.

Should you have any queries regarding this submission please contact me on the above telephone number.

Yours sincerely



Marcus Lambert MRTPI
Director

Cc Mr J Rippon, Capella Partnership