

PLANNING POLICY COMMENTS

Application Number	AWDM/0338/26
Location	Units 1 To 2 3 Meadow Road Industrial Estate Dale Road Worthing West Sussex BN11 2RU
Proposal	Change of use of first floor from industrial (Use Class B2) to a small house in multiple occupation (Use Class C4) for on-site staff; new external fire escape; and roller shutter door to workshop.
DM Officer	Louise Prew
Sent to Policy	27/04/2026
Policy Officer	Catherine Hutchins
Returned to DM	07/05/2026

Key Issues / Policies

Loss of employment floorspace
Introduction of residential within a protected employment area.

Summary

The site is located within Meadow Road Industrial Estate, Worthing. This is identified within Policy DM11 – protecting and enhancing employment sites, of the Worthing Local Plan, as a key employment area.

The current Employment Land Review (2016) describes this employment area in paragraph 5.29 as a *'medium-sized industrial area positioned on the northern side of Meadow Road in the far south-east of Worthing.'* The study describes the industrial estate as: *'The premises at the site comprise a mix of small and large industrial units, with the largest units supporting the operations of Bowers & Wilkins, Mercedes-Benz, and Rossetts Commercials on the eastern side of Dale Road. These premises are generally in excellent condition, while the smaller units located on the western side of the estate are in fair condition. Good infrastructure and landscaping improve the market attractiveness and profile of the site, particularly along Dale Road. Overall, the industrial estate provides a good quality site that supports a range of premises with limited vacancy, despite its lower strategic location.'*

Policy DM11 c) recognises that these key employment areas are essential in maintaining a strong and diverse supply of employment sites and premises to meet the needs of the local economy.

The proposed development is for the change of use of first floor from industrial (Use Class B2) to a small house in multiple occupation (Use Class

C4) for on-site staff; new external fire escape; and roller shutter door to workshop.

Part a) of Policy DM11 protects against the loss of existing premises, sites or floorspace which are used for, or last used for, employment uses, located within the Key Employment Areas, against loss to other uses. As stated on the submitted application form this development would result in a loss of 141 sqm of industrial (Use Class B2) floorspace. Part a) of Policy DM11 does not set out any criteria or circumstances whereby a loss of employment floorspace would be supported in key employment areas.

The proposed development would result in a change of use to a small house in multiple occupation (Use Class C4). The information submitted highlights that this would be ancillary to the primary B2 general industrial use and is directly linked to, and supports, the ongoing viability of the tyre recycling business. However, the information submitted also explains that the industrial activities operate during standard daytime working hours only, and there is no significant activity during evenings or weekends. It is therefore unclear why this is necessary.

The introduction of a residential use within this key employment area is therefore an important consideration both in terms of the impact on the functioning and operation of the key employment area including other occupiers on the estate; as well as the impact of the industrial estate on the amenity of the proposed residential unit.

In terms of the impact of the introduction of residential uses in the key employment area, Part c) of Policy DM11 states that only in exceptional circumstances, where there is clear and robust evidence that the introduction of alternative uses is required to retain a diverse and resilient local economy, will such a change be considered. It sets criteria by which any assessment should have regard to. As follows:

- i) robust evidence setting out the importance of the use to the future of the local economy;
- ii) a demonstration that the introduction of the proposed use would not negatively impact on the functioning of the key employment area or the local economy as a whole;
- iii) evidence that the loss of the existing use would not negatively impact the local economy and;
- iv) evidence of alternative sites outside of the key employment areas have been considered and that no suitable sites are available.

No information or assessment has been submitted as required by Policy DM11 to determine whether the criteria set out in part c) has been met. In the absence of evidence to support part c) the introduction of alternative uses within this key employment area is not justified and therefore part a) of the policy that protects against the loss of employment floorspace applies. We

would consequently advise that the proposed development is contrary to Policy DM11 of the Worthing Local Plan due to the loss of employment floorspace and the introduction of alternative uses.

Should this be resolved, the design of the proposed residential unit and the impact of the surrounding surrounding industrial estate on its future occupants would become a key consideration and Policy DM5 – Quality of the Built Environment and NPPF paragraph 135 are both relevant.