Development Control – Delegated Officer Report

Application Number: AWDM/0964/25 **Recommendation: Refuse**

Site: **Unit 5 Dominion Trade Centre Dominion Way West, Worthing**

Proposal: **Change of use from light Industrial (Use Class Egiii) to a small-group personal training facility (Use Class Ed).**

Site visit: 30.09.2025

Neighbours checked: Y

Additional neighbour notifications: N

Proposal, Site and Surroundings

The application relates to a recently refurbished single storey industrial unit located on the north side of Dominion Way West. The unit has a floorspace of approximately 255sqm and is currently vacant. It was last occupied by 'The Kitchen Store' which, from its advertising material, appears to have operated as a trade and contracts department for the business including a trade showroom although the precise nature of the use or the way this operated is not clear and there is no planning record relating to that specific use. The building has an entrance door to the south elevation and there is a roller shutter door entrance to the east which has access onto a gated parking forecourt area enclosed by palisade fencing and vehicular access onto Dominion Way West. This forecourt area is shared with Unit 6 to the east which is also vacant.

The site is within the East Worthing Trading Estate and identified as a key industrial estate and protected employment site under local plan Policy DM11.

Planning permission is sought for the change of use to a small-group personal training facility (use class E (d)). No external alterations are proposed.

The applicant's statement includes the following information describing the proposed use as follows:

- The gym will operate appointment-only sessions, supervised by a qualified coach, with a maximum of 4 clients per session.

- Operating hours will be 6:00am to 8:00pm, Monday to Friday, with reduced hours at weekends.

- The business serves local working professionals and operates in a structured, low-impact format.

- All training takes place indoors and the unit will not be altered externally.

- The gym will install specialist rubber gym flooring and functional training equipment, which also acts as an acoustic barrier to absorb vibration and reduce noise transfer.

- No amplified music or loud group classes will be used-sessions are instructor-led and intentionally low volume.

- In recognition of the early and late operational hours, noise levels will be kept to a minimum during morning (6:00-8:00am) and evening sessions.

Parking would be provided within the existing courtyard area to the east of the building. A parking layout plan has been provided indicating five car parking spaces available.

Relevant Planning History:

WB/677/69 Change of use of single storey warehouse to light industry, (2,998 sq. ft.). Approved 3.11.1969 -

Condition 4: *The premises shall not be used for any purpose, other than those mentioned in Use Class III of the Schedule to the Town and Country Planning (Use Classes) order 1963.*

Class III of the 1963 order relates to a light industrial building.

Consultations:

The **Highway Authority** raises no objections to the proposals and has provided the following comments:

The proposed use involves no external alterations to the building. Internally, the space will be fitted with gym flooring, functional training equipment, and minor partitioning for reception and consultation purposes. Sessions will be pre-booked and operated by appointment only, typically involving 1 coach with up to 4 clients per session.

The business model focuses on structured, small-group personal training aimed at local professionals, with operating hours designed to avoid peak traffic times and minimise disruption. All activities fall within the scope of indoor sport, recreation, and fitness as defined by Class E(d) of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

This change of use will activate a vacant or under-utilised unit, bring new footfall to the area, and provide health and well-being benefits to the community in a low-impact, well-managed format. There are no changes proposed to the buildings footprint, elevation, access, or parking arrangements.

The Highway Authority would not raise an objection to the proposed change of use, however a plan showing the parking spaces is required.

Following receipt of a parking plan, the **Highway Authority** has been reconsulted and has confirmed that the parking plan is acceptable.

The Council's **Drainage Consultant** has commented as follows:

Following a review of the submitted information, we have no objection on surface water grounds. Due to the site, size, location, and type of development we would recommend the approval of the application.

The Councils **Environmental Health Officer** has confirmed no adverse comments.

Representations:
None received

Relevant Planning Policies

Worthing Local Plan 2020-2036 (WBC 2023) Policies:
SP1 (Presumption in Favour of Sustainable Development)
SP3 (Healthy Communities)
SS1 (Spatial Strategy)
DM5 (Quality of the Built Environment)
DM8 (Planning for Sustainable Communities/Community Facilities
DM11 (Protecting and Enhancing Employment Sites)
DM15 (Sustainable Transport and Active Travel)
DM20 (Flood Risk and Sustainable Drainage)
DM22 (Pollution)

National Planning Policy Framework (MHCLG 2024)
National Planning Practice Guidance

Sustainable Economy Supplementary Planning Document 2012

Planning Assessment

Principle of Development

The site is within the East Worthing Trading Estate and identified as a key industrial estate and protected employment site under local plan Policy DM11. It is not clear precisely how the former use operated, for example to what extent this included office use, the extent of the trade showroom, or whether the use included any storage, distribution, or workshop activity etc. Nevertheless, the former business appears to have been in operation for less than ten years and with no other relevant planning permission the previous lawful use for light industrial uses would apply here. This would fall within the current use class E(g)(iii) and therefore the proposal to change the use to a small-group personal training facility (use class E(d)) would represent the loss of premises for employment purposes under policy DM11.

Having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to improving the competitiveness of Worthing and the wider sub regional economy. To achieve this the Council needs to plan for additional growth and ensure that existing employment land is protected and used more effectively and efficiently.

Policy DM11 seeks to protect against the loss of employment uses and states that:

a) Existing premises, sites or floorspace which are used for, or last used for, employment uses, located within the following Key Employment Areas will be protected against loss to other uses.

b) Protected Key Employment Areas

i) The following key industrial estates and business parks will be protected:
● Broadwater Business Park
● Northbrook Business Park
● Northbrook Trading Estate
● Canterbury Road (including Garcia Trading Estate)
● Downlands Business Park
● East Worthing Industrial Estate
● Faraday Close
● Goring Business Park
● Ivy Arch Road
● Meadow Road Industrial Estate
● Yeoman Way

ii) The following key office locations will be protected:
● Liverpool Terrace/Liverpool Gardens
● Chatsworth Road
● North Street/High Street
● Railway Approach
● Crescent Road
● Farncombe Road

c) 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 and given the significant land constraints the Council are seeking to protect them for employment uses appropriate to their location.

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. In undertaking any assessment regard will be had to the following factors:

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.

d) Outside the identified Protected Key Employment Areas listed above, existing premises and land or floorspace which is used, or was last used, for use employment uses will be protected unless it can be satisfactorily demonstrated that the site (or part of the site) or premises is genuinely redundant and is unlikely to be re-used for employment uses within the Plan period, having regard to the following factors:

i) the primary focus is to be protect existing employment uses however, greater flexibility will be given to other employment generating uses which cannot reasonably be located elsewhere;

ii) if the introduction of any non-employment uses will not negatively impact on the operation of the remaining or neighbouring uses;

iii) if the site, with or without adaptation, would not be capable of accommodating an acceptable employment development;

iv) if no effective demand exists or is likely to exist in the future to use the land or buildings for employment use. Consideration should include the length of time the property has remained vacant, the attempts made to sell/let it and the demand for the size and type of employment premises in the area;

v) if the loss of a small proportion of floorspace would lead to a significant upgrade of the remaining employment floorspace; and

vi) if the existing use conflicts with neighbouring uses.

Only in exceptional circumstances will a change of use involving a loss of employment use be acceptable. The applicant has sought to demonstrate this in their supporting statements which is set against criteria (c) as follows:

i) robust evidence setting out the importance of the use to the future of the local economy:

2.1 The applicant, Connor Weston, started his personal training business, Function Facility Ltd., 2 on 1st July 2024. Operating out of a small premises on Victoria Road in Worthing, he and his business partner work as personal trainers (PT), and employ a further two personal trainers, all four of them working full time. They hold eight, one hour training sessions each day, for a

maximum of four people (four clients to one PT). Mr Weston is already looking to employ a fifth PT to work full time in the business.

2.2 The company is now at full capacity at the Victoria Road premises, but have more potential clients who would like to join. Clearly, moving to larger premises will allow the company to expand and create more jobs and healthier clients in the process.

3.2 The health and fitness industry is a strong and growing sector of the economy. Between 2023 and 2024 health and fitness revenue in the UK grew by 8.8%. In the two years from 2022 to 2024 gym membership revenue increased from £4.05bn in 2022 to £5.19bn in 2024. That's a 13.1% increase. The personal training segment is significant and growing, estimated to be worth £768.1 million, and forecast to grow to £800 million by 2025. 7 Clearly, the sector is very buoyant and projected to continue increasing in size.

3.3 The success of the applicant's own business in only one year of trading testifies to this strong demand. The type of training offered by Function Facility, where the client to trainer ratio is 4 to 1, offers an intensive, client focused service. This is particularly popular with individuals who find the standard gymnasium experience to impersonal and not geared towards their personal fitness goals. The applicant's need for a larger premises after only one year of trading, and his ability to take on more staff, is clear evidence of the importance of the health and fitness industry to the local economy, as is required by (i) of policy DM11(c).

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:

3.4 The use of Unit 5 as a personal training facility will not negatively impact on the functioning of the Broadwater Industrial Estate as a key employment area (see DM11(c)(ii)). The site has ample off-street parking for clients and staff, and the use itself would not detrimental to the operations carried out in adjacent premises.

3.5 As detailed in section 2, the marketing of the premises over the previous seven months, and the more general situation with regards to commercial lettings in Worthing, is evident of low demand for commercial floorspace in recent years. It is highly unlikely that a tenant falling within one of the employment classes listed in paragraph 5.154 of the Local Plan will come forward in the foreseeable future. The unit has stood empty for over seven months, during which time it has contributed nothing to the local economy. From the moment that the applicant relocates his business into Unit 5 there will be positive benefits for the local economy. He will hire a fifth, full time personal trainer, and expand the number of clients and daily training sessions.

3.6 It will also free up the current premises in Victoria Road to 'After Hours' a pilates business. Mr Weston can sub-let the premises to this new tenant, a positive economic benefit for the town.

3.7 Not only does Function Facility Fitness create economic activity through direct job creation, it also supports a number of local businesses. They have a cleaning contract with Luna Cleans worth £100 a month, a premier coffee machine hired from Coffee Roasters, and a book-keeper and accountant. And all these positive economic effects will continue for a minimum of five years, which is the length of lease the applicant is willing to sign for the premises.

3.8 The building will need refurbishing prior to their occupation, which will create work for painter decorators and other tradesmen.

iii) evidence that the loss of the existing use would not negatively impact the local economy:

2.4 The lease for Unit 5, Dominion Trade Centre, became available at the end of February this year. The premises was vacated at the beginning of the year by the previous tenant. It is being marketed by Justice & Co Commercial Property Specialists, Goring Road, Worthing. 3 The unit extends to 2,746 sq ft (255sqm) and is offered at a rent of £35,700 per annum. This represents a competitive rental for a unit of this size, quality and location.

2.5 The tenant in Unit 6, adjacent to Unit 5, also vacated their premises at the beginning of 2025 and the leases both units 5 and 6 are being marketed by Justice & Co., with vacant possession, at a combined rental of £70,000 per annum.

2.6 In the seven months since Unit 5 was available, the agents have only received five expressions of interest. The applicant, Connor Weston, was the first to view the premises in April. He found Unit 5 to be perfect for his business needs and is ready to sign a five year lease with the landlord. Since then there have been four other viewings, of which one did not turn up, two said the premises were unsuitable, and the fourth advised they were not ready to re-locate. Therefore Connor Weston is the only person that has shown any real interest in the unit in over seven months of marketing.

2.7 The agent confirms that five viewings in seven months is an extremely low level of interest in a commercial leasehold property. She also told this consultant that commercial property market in Worthing remains stubbornly sluggish. Worthing Business Park 4 is a new development of freehold and to let commercial units on Dominion Way. It is now complete, but less than half of these units have been occupied to date. Again, this slow take up reflects the weak demand for commercial lettings in the Worthing travel-to-work area.

2.8 Stiles Harold Williams' January 2024 review of rents across the region noted that take up of industrial premises was low in Worthing,
"In Worthing, although rents moved upwards by £0.50 per sq ft to £12 per sq ft, only 5,500 sq ft was transacted in 2023. Availability is relatively high at 294,000 sq ft, mostly in a single building of 261,000 sq ft, with logged demand totalling 660,000 sq ft." 5

2.9 The Planning Practice Guidance (PPG) 6 advises that when considering whether there is a realistic prospect of an allocated site being developed for its intended use, it may be relevant to take into account whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.

2.10 The application site has been marketed for a reasonable period at a realistic price. The very low level of interest in Unit 5 since February 2025, coupled with the good level of availability of industrial and commercial premises in Worthing and surrounding areas, indicate that the likelihood of an alternative tenant coming forward and offering to sign a five year lease is extremely low.

3.9 There is no existing tenant in the building, so with the relocation of Function Facility Fitness into Unit 5 there will be no loss of an existing use. Whilst with the relocation of the business there will be a clear, indisputable positive impact on the local economy, not a negative impact, in accordance with DM11 =(c)(iii).

iv) evidence of alternative sites outside of the key employment areas have been considered and that no suitable sites are available:

2.3 Mr Weston has been looking for a new premises for the past six months. His parameters for a suitable site is a building between 2,500 and 3,000 sq ft, with parking, good floor to ceiling height to allow for workouts with equipment, and solid concrete floors. During the past six months he has looked at a number of premises in Worthing, but none have been suitable.

3.10 The applicant looked at a number of sites in Worthing before agreeing to rent Unit 5. None of these were suitable for his business, the parameters for which are quite exact. The premises must be away from residential properties that could be affected by noise. It must have good floor to ceiling heights to accommodate weight lifting equipment, solid concrete floor, be between 2,500 and 3,000sq ft and have off-street car parking. None of the other premises he viewed had all of these requirements.

3.11 Moreover, the Dominion Trade Centre is in an accessible location within the built-up area of Worthing. Bus services run along Dominion Road one third of a mile to the south of the site. The personal training facility will be conveniently located to serve the local community of Worthing nearby. As the application site is located where it would be reasonable accessible to a large catchment population, including by public transport, it meets the definition of sustainable development, whereby the overall benefits of the use will outweigh the degree of harm arising from the policy conflict.

In weighing up the overall planning balance, consideration can be given to the nature of the proposed use as promoting health lifestyles.

Local Plan Policy SP3 states that 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. In order to maximise opportunities to promote healthy lifestyles, where appropriate, new development must (amongst other things) improve the quality and quantity of informal and formal recreation opportunities.

Local Plan Policy DM8 recognises that communities need a range of education, health, social, community and cultural facilities and services to support their health and mental well-being, and that it is important that these are accessible to all and respond to the needs of different ages and groups, particularly those with disabilities, and more deprived members of the community. It is recognised that locating these services close to the communities they serve, helps reduce the need to travel as well as creating strong inclusive neighbourhoods.

It is not disputed that the proposal would provide the local community with a beneficial leisure and recreation resource that would support health and well-being.

However, land is an extremely scarce resource in Worthing that is subject to many competing demands and pressures.

The Council's Planning Policy Officer has commented that DM11 clearly seeks to protect the limited amount of employment space across the Borough and acknowledges the implications of the wider issue of land constraints for all uses. It seeks to apply stronger protection to those identified 'Key Employment Areas' where 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 having regard to the criteria in (c). Outside of these protected areas whilst there is still a high level of protection there is more opportunity for a more flexible approach, again subject to certain criteria set out in the policy.

The Planning Policy Officer states that: 'The evidence underpinning this approach which was supported at examination and ultimately by the Inspector was the Worthing Economic Research and Employment Land Review (ELR) (2016 and update 2020). Para 5.150 outlines the conclusions of that study and states 'No evidence has been found to suggest that the existing employment sites assessed in the study no longer have a reasonable prospect of continuing to be used for employment uses over the plan period. As a result, the evidence is clear that employment land in the borough needs to be retained. To achieve this, the Plan seeks to protect the borough's key industrial and business areas and provide a level of protection to employment uses outside of those key areas'

The conclusions to the ELR update 2020 which looks at need across the plan period - 2020 - 2036 states:

'5.28 The development of new industrial space in Worthing has been relatively limited in recent years, with the exception of two schemes at the Former Eurotherm Site in Dominion Way and GlaxoSmithKline's new premises in Southdownview Road. Much of the current stock comprises older, dated

premises that are in need of refurbishment and modernisation. The strong demand for industrial space coupled with a severe shortage of units in the Borough mean that existing local businesses struggle to find suitable space to accommodate their expansion or relocation plans in the local market, while enquiries from businesses outside the Borough can rarely be met. The limited supply of industrial floorspace in Worthing is constraining industrial activity and has likely resulted in potential economic opportunities being diverted from the Borough as businesses are unable to find suitable industrial space within its boundaries.'

The supporting text to Local Plan Policy DM11 states:

'5.149 Existing employment space in Worthing is both in high demand and under threat from other uses. Furthermore, a lack of development opportunities severely limits options for future employment growth. It is therefore important to ensure that there are long term plans to allow for the growth of businesses and that appropriate sites (i.e. suitable for continued employment use) are not released in the short term.'

The starting point of Policy DM11 is set out in criteria a)

'a) Existing premises, sites or floorspace which are used for, or last used for, employment uses, located within the following Key Employment Areas will be protected against loss to other uses '

The supporting text to the policy clarifies the definition of 'employment uses' as:

'5.154 This policy applies to all sizes of employment floorspace including ancillary uses, however the level of evidence required will be proportionate to the size of the space within each proposal. For the purpose of this policy ‘employment uses’ are defined as uses that fall within the following use classes; Storage & Distribution (B8), General Industrial (B2), Office (Class E(g)(i)), Research and Development (Class E(g)(ii)) and Light Industrial (Class E(g)(iii)).'

The Local Plan Inspector in his Final report supported the policy approach and considered there was clear robust evidence to support it and concluded that it aligns with government policy:

'Policy DM11 - Protecting and Enhancing Employment Sites -

Para '214. Policy DM11 sets out the Council’s approach to protecting existing employment sites. It identifies ‘protected’ employment and ‘key’ office location and sets out how proposals within these areas will be considered. The locations listed in criteria b(i) and (ii) have been identified on the basis of a robust approach. The principle of providing a degree of protection to existing employment sites is reasonable, particularly in a context where it may not be possible to meet all future needs. In this context, the policy sets a justifiably high bar to allowing alternative uses. Nevertheless, there is a sufficient degree of flexibility to ensure sites with little or no chance of being used for employment

are not protected unnecessarily. This is consistent with paragraph 82 of the NPPF.'

Against the backdrop of significant land constraints and the need to carefully balance the competing needs of the local economy and communities the approach in policy DM11 is one that seeks to protect the most valued employment sites but still allows for a more managed release where certain criteria are met. Within that policy there is a recognition that whilst all employment space is under threat the policy differentiates between those specific locations that are afforded a stronger level of protection where loss will be strongly resisted and only in exceptional circumstances will their loss be supported (criteria c). However, a greater level of flexibility is applied under criteria d) to those sites outside the protected areas that are currently or were last used for employment to the loss to other uses. The criteria are listed under d) with guidance on these criteria set out in the Sustainable Economy SPD.

It is acknowledged that the proposal is a successful local enterprise and their desire to grow and expand their use is to be welcomed. However, the proposed location to one of the Boroughs Key Employment Areas where the underlying evidence clearly states should be protected for the employment uses as defined by the policy is clearly contrary to Policy DM11. The Council would apply a more flexible approach to those sites that are currently in an employment use but outside of these key areas.

There are examples of uses similar to the one proposed that are located within more sustainable town centre locations such as Worthing Town Centre in former retail units or above retail units and given that this type of use would be a positive contributor to the vitality of our centres, more sustainably located and potentially offer linked trips it should be an option that is explored further.

The application premises appear to offer a good quality of accommodation which can offer suitable accommodation for employment as defined by policy DM11. This is corroborated by the marketing evidence submitted with the application which states:

'This well presented light industrial / trade counter unit forms part of a private scheme of 7 units anchored by Easy Bathrooms on the popular Dominion Way West in Worthing, West Sussex. Other occupiers within the Estate include Screwfix, Howdens and Booker Wholesale. The unit benefits from concertina shutter door, concrete screeded floor, three phase electricity, burglar alarm (not tested), separate pedestrian doors with small kitchenette and WC's located at the rear. Parking is situated in a shared yard whilst the surrounding roads are also free from any parking restrictions. The units were refurbished in 2019 and provide accommodation for trade counter, industrial, storage, manufacturing and research and development uses. The unit is available from April 2025 on new lease terms and viewing is highly recommended.

Well Presented Light Industrial / Warehouse Unit
Situated on Popular East Worthing Trading Estate - Nearby Occupiers Including Screwfix, Booker Wholesale, Howdens & Easy Bathrooms

Off Road Parking With Shared Yard
Refurbished in 2019
Suit Variety of Commercial Uses (stpc)
Available From May 2025 on New Lease Terms'

The premises only seemed to have been available from May 2025 but state that marketing was 7 months.

The Sustainable Economy SPD 2012 states:

' Lack of Market Interest

2.18 The Council will normally expect employment land and premises to be actively marketed for at least 12 months (small sites) and 18 months (large sites) and it may be necessary to review the effectiveness and quality of the marketing strategy every 6 months. It is accepted that the scale and nature of the proposal will influence the appropriate level of marketing time and this should be agreed in discussion with the Council officers. In exceptional circumstances a shorter marketing period may be agreed subject to compliance with other requirements within this SPD. 2.19 A simple statement, such as “the site has been on our books for 12 months and no interest has been expressed”, will not demonstrate genuine redundancy. The Council requires greater detail on which to make a judgement. Typically this will include a breakdown of the marketing strategy which should be prepared by a suitably qualified professional, such as a Chartered Surveyor who is active within, and familiar with, the Worthing employment land market. The marketing strategy should bring the availability of the site to the notice of the local business community and where appropriate to the regional and national market and should include the elements outlined in Appendix 2. '

Overall the policy position is that the proposal is contrary to Policy DM11 of the Worthing Local Plan and would result in the loss of good quality accommodation that meets the needs of the local economy by providing space for the employment uses as identified within the policy, in a key employment area. As such the proposal cannot be supported by planning policy.’

Changes to the national planning legislation which has allowed greater flexibility to move between uses classes (e.g. from business/commercial uses to residential uses), and also greater flexibility through the very broad range of uses now comprised with Class E, has given added importance to the use of planning policy to retain employment sites and manage change.

The Planning Policy Officer has considered the further evidence provided by the Applicant in support of the proposals and does not consider this sufficient to justify a departure from the policy position. Whilst the growth of this particular business is welcomed in the town, the site at Unit 5 appears to be of good quality, and there is limited evidence to demonstrate an exception under the criteria of DM11 (c). In the absence of robust evidence to justify its loss as an employment use as identified in the policy it is considered the proposal would

cause unacceptable harm to the availability of suitable industrial and employment premises in the Borough contrary to policy DM11.

Residential amenity

The premises are within an established commercial area where there would be a level of noise and activity associated with the surrounding industrial/ commercial uses. The premises are well separated from residential properties with those nearest being in Hamilton Close some 90+ metres to the west on the opposite side of Southdown View Road. No objection has been raised by the Environmental Health Officer and having regard to the nature and scope of the proposed use and surrounding character it is considered that the proposed use would not pose any significant impact to the amenities of nearby occupiers. Had the principle of the proposed use been supported, hours of operation could have been controlled by condition in the interests of protecting amenity.

Visual amenity

No external alterations are proposed and it is considered that the proposed change of use would not have any significant detrimental impact on the character of the area.

Access and Highways

The site can be considered sustainable to the extent that it is within walking/cycling distance of local services, amenities, East Worthing Train Station, and bus services in Dominion Road providing connections to the town centre and wider area.

No objection has been raised by the Highway Authority in terms of parking, highway safety or transport grounds. Car Parking for five vehicles has been indicated on the revised details and the Highway Authority has agreed that this is acceptable. Cycle parking provision would help to reduce the reliance on the private car and had the application been acceptable in other respects this could have been secured by condition.

Sustainable Development

The SFRA 2024 identifies parts of the site as being susceptible to surface water flooding. The Environment Agency's standing advice would apply to this change of use with a vulnerability classification of 'less vulnerable'.

The applicant has provided a basic flood risk assessment which outlines floor levels would be no lower than existing levels and flood proofing of the development has been incorporated where appropriate.

No alterations are proposed, and it is noted that the vulnerability classification would not alter as a result of the proposed change of use. However, the ability for users to safely evacuate and whether adequate flood warnings would be available to users should be considered. A flood warning and evacuation plan

is recommended to ensure safe access and egress for the site and could be secured by condition if the application was approved.

In respect of drainage, it is noted that there would be no increase in impermeable area and no objection has been raised by the Councils drainage consultant on surface water grounds.

Recommendation

REFUSE for the reason: -

1. In the absence of robust evidence to the contrary there is no justification for the loss of the existing premises from industrial employment use, which would cause unacceptable harm to the availability of suitable industrial employment premises in the Borough contrary to Local Plan policy DM11 and the relevant policies of the NPPF which support economic growth.

Informative
The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and determining the application within a timely manner, clearly setting out the reason(s) for refusal, allowing the Applicant the opportunity to consider the harm caused and whether or not it can be remedied by a revision to the proposal. The Local Planning Authority is willing to provide pre-application advice in respect of any future application for a revised development.

Is recommendation contrary to letter(s) of representation? N

Case Officer: Rebekah Hincke Date: 25.11.2025

Authorised by: Jo Morin Date: 26.11.2025