

30 July 2026

Louise Prew
Planning Department
Worthing Borough Council
Town Hall, Chapel Rd, Worthing
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SL/Let/P2295

Dear Louise,

Heritage Rebuttal (reference AWDM/1330/25 & AWDM/1329/25) at the Car Park Adjacent Sandell House, Railway Approach, Worthing, West Sussex

Introduction

Following the recent constructive dialogue between the Council and the project architects (Architectus) regarding the proposed development, we have reviewed the latest design iteration. We welcome the opportunity to provide this updated heritage commentary in support of the revised submission.

We maintain that the Council's previous assessments of heritage impact did not fully account for the proportionality of the design response or the detailed mitigation strategies employed to protect the Grade II Listed Original Worthing Railway Station. The refinements now presented by the design team, developed in direct response to the Council's feedback, further reinforce our view that the scheme is sensitive to its historic context.

As outlined in our initial Heritage Statement, the scheme was prepared in accordance with Historic England's *The Setting of Heritage Assets (GPA3)*. We believe the following amendments, as now formalised in the updated drawings, significantly enhance the relationship between the new development and the heritage asset:

Amendments and Heritage Considerations:

1. **Removal of the Link to the Listed Building** The removal of the link between the western portion of the proposed development and the eastern wing of the Listed Building is a positive change. This separation between the new apartments and the heritage building enhances the physical and visual distinction between the two, improving the overall setting of the Listed Building, and furthermore eliminating any perception of physical harm to the heritage asset.

2. **Stepped Massing and Reduced Scale.** The redesign of the western portion of the building now features a single recessed clad floor. This reduction in scale further ensures that the new structure does not dominate the Listed Building, maintaining its prominence and integrity within the streetscape.
3. **Improved Architectural Language.** The revisions to the architectural language, particularly the rhythm of the elevations and the treatment of the fenestration, strengthen the relationship between the new development and its surroundings. This refined approach enhances the visual compatibility of the design with the listed building, ensuring that the new scheme will sit more harmoniously within the streetscape.
4. **Enhanced Landscape Buffer.** The wider landscaping buffer between the car parking area and development significantly improves the visual experience of the site. This additional planting helps to soften the impact of the parking area, which remains a necessary component of the design, and ensures that the development does not detract from the heritage asset.
5. **Revised Materials to Better Reflect the Heritage Context.** The revised material selection, particularly the use of red/orange brick with inset grey/brown brick panels, more closely reflects the aesthetic qualities of the heritage building. These adjustments, alongside the revised fenestration, ensure that the new design is sympathetic to the Listed Building's character and enhances its setting within the streetscape. Further justification is provided in Architectus supporting addendum.

From a heritage perspective, we firmly believe that the amendments introduced significantly reduce the potential impact of the development on the Listed Building. By revising the massing, improving the architectural detailing, and introducing further landscape mitigation, we are confident that the proposal now offers a solution that is both sensitive to the historic environment and responsive to the Council's concerns. The careful integration of these design changes ensures that the heritage significance of the station remains prominent and appreciated, even within the context of the evolving urban landscape.

While the Council has identified that the proposal would result in 'less than substantial harm', it is our firm view, based on the detailed analysis within our Heritage Statement and the design mitigation measures outlined above, that any such harm must sit at the very lowest end of that spectrum. This limited and carefully managed heritage impact must therefore be assessed in the context of the clear and pressing public benefits arising from the scheme.

The need for affordable housing in Worthing is acute and well evidenced. The Council's housing register currently identifies 2,244 households in need, including significant unmet demand for one- and two-bedroom accommodation. This pressure is further reflected in the Council's increasing reliance on temporary accommodation, with associated expenditure rising sharply in recent years. Against this backdrop, the delivery of 27 new homes on this site, including 6 affordable units, represents a meaningful and tangible contribution to addressing local housing need.

The proposal also makes efficient and effective use of a highly sustainable brownfield site, in an accessible location adjacent to the railway station and within the town centre. This accords directly with national planning objectives to optimise the use of previously developed land and to support higher-density development in sustainable, well-connected locations. Given Worthing's tightly constrained urban and environmental context, sites of this nature are critical to meeting housing needs without encroaching on sensitive or undeveloped land.

Taken as a whole, the proposal strikes an appropriate and carefully considered balance between heritage conservation and the delivery of substantial public benefits. The nuanced design response minimises heritage impact to a negligible level of less than substantial harm, which is clearly and decisively outweighed by the social, economic, and regeneration benefits of the scheme.

We trust that these revisions will be viewed as a positive step forward, and we remain hopeful that the proposal can proceed in a manner that respects the heritage values of the site while delivering much-needed housing in a sustainable location.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Sam Sykes MRTPI
Director