



Columbia Threadneedle

LYONS FARM RETAIL PARK

Planning Statement





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APPENDIX A

FULL SEQUENTIAL ASSESSMENT OF SITES – WORTHING TOWN CENTRE

1 INTRODUCTION

- 1.1.1. This Planning Statement has been prepared by WSP on behalf of our client, Columbia Threadneedle (herein referred to as the 'Applicant') in support of an application for full planning permission for the erection of a new retail unit (Class E) totalling 372 sqm (GIA) (the 'Proposed Development') at the existing Lyons Farm Retail Park, Lyons Way, Worthing, BN14 9LA (the 'Site').
- 1.1.2. This Statement should be read and considered in conjunction with the plans and other supporting documents submitted as part of this application. In addition to this Planning Statement, the following supporting documents have been submitted:
- Application Forms and Notices;
 - CIL Additional Information Form;
 - Application Drawings;
 - Design and Access Statement (including Sustainability Statement);
 - Transport Statement (including Parking Survey);
 - Biodiversity Net Gain Assessment; and
 - Air Quality Statement.
- 1.1.3. This Planning Statement is structured as follows:
- Section 2: Site Context
 - Section 3: Pre-Application Engagement
 - Section 4: Development Proposals
 - Section 5: Planning Policy Framework and Assessment
 - Section 6: Sequential Assessment
 - Section 7: Summary and Conclusions

2 SITE CONTEXT

- 2.1.1. The Site is located within and along the southern boundary of the wider Lyons Farm Retail Park, in the administrative boundary of Adur and Worthing Councils ('AWC'). The Site is located circa 1.5 miles to the north of Worthing Town Centre.
- 2.1.2. The surrounding context is predominantly commercial, owing to the Site's location within the wider Lyons Farm Retail Park. Lyons Farm is a notable commercial hub, which serves as an out-of-town shopping destination for the local community and visitors alike.
- 2.1.3. Immediately south is the A27, with terraces of two-storey semi-detached residential dwellings characterising the wider area to the west and south.

Planning History

- 2.1.4. A review of Worthing Council's planning applications database has found the following applications to be of relevance in the context of the emerging development proposals at the Site and wider Lyons Farm Retail Park.
- 2.1.5. In August 2018, the Council approved an application (ref. AWDM/0178/18) at Unit B Lyons Farm Retail Park for a change of use of the retail unit (A1) to use as a gym/ health and fitness centre (D2) and installation of a mezzanine level. A condition was attached to the permission restricting the use of the unit to Class D2 only.
- 2.1.6. A full planning application was submitted in September 2016 for alterations to the shop front and installation of new windows to the east and south elevations of Unit C. The application (ref. AWDM/1281/16) was approved subject to conditions in October 2016.
- 2.1.7. Other applications have been submitted in respect of the existing retail units, albeit they largely relate to the installation of signage and other minor works and are not considered to be of direct relevance to the Proposed Development.

3 PRE-APPLICATION ENGAGEMENT

- 3.1.1. The Applicant has engaged with the Local Planning Authority in the pre-application process in respect of the emerging development proposals. A meeting was held with AWC on 6 February 2025. The pre-application advice (dated 19 March 2025) noted that whilst the Site sits on an established retail location, it is considered to be an out of centre in retail policy terms (thereby triggering the requirement for a Sequential Test), whereby the Development Plan directs retail to town centres in the first instance. A Retail Assessment has been prepared as part of this application and is provided within Section 6 of this Planning Statement.
- 3.1.2. In terms of design, Officers noted that the proposed unit would have a modern appearance and would retain some of the characteristics of the existing retail units and on balance, considered the proposed design would be acceptable (subject to landscape considerations). The proposed retail unit would result in a loss of the existing landscape buffer, which currently comprises an area of grassland. An element of landscaping would therefore need to be retained to not negatively impact the street scene.
- 3.1.3. With regard to transport and highways, Officers requested that a Parking Survey be undertaken and provided as part of any future planning application to demonstrate capacity on site for additional users. The requirement to provided cycle parking for the new unit was also highlighted. A Parking Survey has been undertaken, the results of which can be found within the supporting Transport Statement, prepared by WSP.
- 3.1.4. Other matters which were raised by ADC for consideration as part of a future planning application included biodiversity net gain (where there would be a 20% net gain requirement) and an Air Quality Statement given the Site falls within an Air Quality Management Area. This application includes both a Biodiversity Net Gain Metric and Air Quality Statement. A summary is provided within Section 5 of this Planning Statement and full details can be found within the respective reports.

4 PROPOSED DEVELOPMENT

- 4.1.1. The Proposed Development comprises the erection of a new retail unit (Class E) totalling 372 sqm Gross Internal Area (GIA), at the southern boundary of the established Lyons Farm Retail Park. The proposal seeks to enhance the existing retail offering at the Site.
- 4.1.2. The proposed retail unit will be contemporary in design. It is proposed to incorporate red brickwork to complement the neighbouring unit and introduced a contemporary pitched mansard roof utilising anthracite metal cladding. The maximum height of the proposed unit is 8.950m, which is in keeping with the prevailing heights of the existing nearby units.
- 4.1.3. Access to the Site will be via the existing Lyons Farm Retail Park, with the customer entrance located to the front of the proposed unit. An emergency access will also be provided to the rear of the unit in the event of a fire.
- 4.1.4. A new landscaped area is proposed to the south of the proposed new unit, to provide a buffer to the street scene, similar in depth to other retail units to the west and the existing car park to the east. A 1.2m gabion wall is proposed along the southern boundary, which will introduce four varying species of climbers to create visual interest and enhance biodiversity at the Site. The existing trees will be retained, as well as the remaining existing landscaped areas which will be made good if affected during construction. Full details of the landscape proposals can be seen at drawing ref. 16755-1-SFW-XX-XX-DR-L-1001.
- 4.1.5. The proposed retail unit would utilise the existing vehicle car parking capacity (totalling 147 spaces) associated with Units A – C at Lyons Farm Retail Park. A parking survey demonstrates that there is sufficient capacity within the existing car park to accommodate the enhanced parking demand for the new unit and therefore no changes are proposed to the existing car park.
- 4.1.6. 10 additional cycle parking are proposed, which will be located adjacent to the new unit.
- 4.1.7. Servicing would be via the front of the proposed unit, which is acceptable given the likely future showroom use, meaning deliveries would be infrequent. Further details on the proposed parking and servicing arrangements are provided within the accompanying Transport Statement, prepared by WSP.

5 PLANNING POLICY FRAMEWORK AND ASSESSMENT

- 5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. The Development Plan for the Site comprises the following documents:
- Worthing Local Plan (2023); and
 - Worthing Local Plan Policies Map (2023).
- 5.1.3. In accordance with the Worthing Local Plan Policies Map (2023), it is understood that the Site falls within the Worthing Built Up Area Boundary.
- 5.1.4. Other material considerations of relevance to the Proposed Development includes the National Planning Policy Framework (NPPF) which was updated in December 2024 and sets out the Government's planning policies and how these should be applied.
- 5.1.5. The following section will assess the key planning policy considerations associated with the Proposed Development, including the principle of introducing new retail floorspace outside of the town centre, design, transport and environmental considerations.

Principle of New Retail Floorspace

- 5.1.6. Worthing Local Plan Policy SS1 ('Spatial Strategy') states that development within the Built Up Area Boundary will be permitted (subject to compliance with other relevant policies). Development should make efficient use of previously developed land and ensure the density of development is appropriate for its proposed use, relating well to the surrounding uses and the character of the area.
- 5.1.7. Worthing Local Plan Policy SS3 ('Town Centre') seeks to ensure that retail uses are directed to the Town Centre.
- 5.1.8. Worthing Local Plan Policy DM13 ('Retail and Town Centre Uses') outlines the hierarchy of town and local centres. Where retail floorspace is proposed outside centres, an impact assessment will be required for proposals over 500sqm (gross).
- 5.1.9. The proposals currently seek to introduce 372 sqm (GIA) new retail floorspace at an existing and long established retail park which falls within the Built up Area Boundary. A retail impact assessment is not required as the size of the proposed unit falls below the 500 sqm threshold. Moreover, due to the size and servicing limitations of the unit, the end users for this unit will be bulky goods and/or a showroom style use and therefore offer a range of goods that aren't typically located in the town centre. We therefore strongly believe that this unit will not compete with the town centre, will utilise linked trips with other existing retail units, and will further complement the existing retail tenants on site. This is a long established out of centre retail location so will simply a wider offer of goods to existing users of the park.
- 5.1.10. The only logical location for this size of retail unit and the bulky goods it will offer is an out-of-town retail park and Lyon Road Retail Park specifically on this occasion. In any event, no other sites exist in Worthing town centre that are suitable and available for the proposed development. A Sequential Test has been undertaken in support of this application, which is provided within Section 6 of this Statement and provides further evidence and policy justification for the introduction of a new retail unit at the Site.

Design

- 5.1.11. Worthing Local Plan Policy DM5 ('Quality of the Built Environment') states that all new development should be of a high architectural and design quality. Consideration should be given to the proportion, form, design context, massing, siting, layout, materials and other design features.
- 5.1.12. Worthing Local Plan Policy DM16 ('Sustainable Design') requires all development to meet relevant sustainability standards unless it can be demonstrated that it is not practicable, feasible or viable.
- 5.1.13. The proposals utilise red brickwork, which is complementary to the neighbouring unit. The proposed pitched mansard roof with anthracite metal cladding provides a contemporary and modern finish to the proposed unit. The siting of the proposed unit is set back from its neighbour, which follows the layout and form of the existing retail units. The height and massing are largely in keeping with the wider retail park and is therefore considered to integrate well with the surroundings. On this basis, the design of the building is appropriate and complimentary, providing a visual betterment to the prominent A27 frontage and fully accords with Policy DM5 and DM16.

Transport and Highways

- 5.1.14. Worthing Local Plan Policy DM15 ('Sustainable Transport and Active Travel') supports active travel by walking, cycling and public transport to reduce the number of journeys made by car. New developments should be well located and provide an appropriate level of cycle parking, car parking and electric vehicle space allocations.
- 5.1.15. The West Sussex County Council Guidance on Parking at New Developments (September 2020) requires one car parking space to be provided per 14 sqm of new non-residential floorspace. In terms of cycle parking, the guidance stipulates that 1 space should be provided per 100 sqm for staff and 1 space per 100 sqm for customers.
- 5.1.16. No new vehicle parking spaces are proposed. The Proposed Development will utilise the existing car parking available, totalling 147 spaces. It is considered that the existing parking provision has sufficient capacity to accommodate the proposed new unit.
- 5.1.17. The proposals includes provision for 10 cycle parking spaces.
- 5.1.18. On this basis, it is considered that the proposals accord with Local Plan Policy DM15 as the development would not encourage the use of private vehicles by providing additional car parking spaces. The cycle parking provision has been maximised for the Site and is appropriate for the Site and its likely end-user/ use.

Landscape and Public Realm

- 5.1.19. Worthing Local Plan Policy DM5 ('Quality of the Built Environment') states that where appropriate, existing trees and green infrastructure will be protected and integrated into new development. The policy states that the existing natural features of sites should be respected.
- 5.1.20. Worthing Local Plan Policy DM6 ('Public Realm') emphasises the importance of enhancing the public realm. Development proposals must ensure the public realm is safe, accessible for all, inclusive and attractive. New development should incorporate high quality design, landscaping and green infrastructure.

- 5.1.21. Worthing Local Plan Policy SP2 ('Climate Change') states that developments should achieve an overall net gain for biodiversity commensurate with the scale of the development, including a positive contribution to the habitat network through habitat protection, creation and enhancement.
- 5.1.22. Worthing Local Plan Policy DM18 ('Biodiversity') requires new developments to ensure the protection, conservation and enhancement of biodiversity. New developments should provide a minimum of 10% net gain for biodiversity on-site, where possible. Where achievable, a 20% on-site net gain is encouraged and is required for development on previously developed sites.
- 5.1.23. Local Plan Policy DM19 ('Green Infrastructure') states that development should protect, conserve, enhance and deliver green infrastructure. The policy states that there should be no net loss of trees and any which are removed should, where practical and appropriate, be replaced.
- 5.1.24. The proposed unit would be located on an existing small, landscaped area along the southern boundary of the existing retail park. This area comprises a grass mound providing separation to the A27. A new narrower landscaped area is proposed to the south of the proposed new unit, continuing to provide a buffer to the street scene, but one more similar in depth to other retail units to the west and the existing car park to the east. The introduction of a perimeter retaining wall comprising stone filled gabion baskets will provide an attractive defensible boundary where plants to grow and will create a softer appearance along this elevation. No existing trees would be lost as a result of the Proposed Development, in accordance with Policy DM19.
- 5.1.25. The proposals have sought to maximise the introduction of new habitats on-site as far as possible and will subsequently achieve a biodiversity net gain. The details of this are set out in the accompanying BNG Report. Overall, the Proposed Development would accord with Local Plan Policy DM18.

Environmental Considerations

- 5.1.26. Worthing Local Plan Policy DM22 ('Pollution') states that development should not contribute to or be adversely affected by unacceptable levels of pollution. Where possible, developments should help to improve local environmental conditions. Mitigation measures will be required for developments that could increase levels of pollution, taking into account any cumulative impact.
- 5.1.27. The results of the air quality assessment demonstrate that the development proposals comply with national and local policy for air quality based on this qualitative assessment of construction.

6 THE SEQUENTIAL ASSESSMENT

- 6.1.1. The Site is out of centre in retail policy terms (more than 300m from the Primary Shopping Area of Worthing Town Centre). The proposal is to create a bulky goods retail unit in proximity to similar stores for customers to compare and contrast goods.

6.2 Policy Background

- 6.2.1. The NPPF confirms that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan.
- 6.2.2. The NPPF states that applications for main town centre uses should be in town centres, then edge of centre locations, and only if suitable sites are not available within a reasonable period, should out-of-centre sites be considered. It also requires applicants and local planning authorities to demonstrate flexibility on issues like format and scale.
- 6.2.3. Therefore, given the proposed development comprises a retail unit outside of a defined centre, a sequential assessment has been undertaken in support of this application.
- 6.2.4. However, the nature and scale of the proposal needs to be recognised when considering the suitability and availability of alternative sites. The assessment must consider the “real world” in which the applicant and local planning authority must operate. The need for a “real world” approach is established in case law. It is, therefore, against this background that the sequential approach to site selection has been considered.
- 6.2.5. The following factors should also be considered in a sequential assessment:
- Availability – whether sites are available now or are likely to become available for development within a reasonable period of time;
 - Suitability – whether a site could be developed for the proposal, having regard to the requirement to demonstrate flexibility and whether the site is suitable to accommodate the specific need or demand the proposal is intended to meet; and
 - Viability is also relevant to the suitability of a site.
- 6.2.6. A site must meet all of these criteria in order to be considered sequentially preferable. (ie it must be available and suitable as well as being viable). These matters are explained in further detail in the Planning Practice Guidance (PPG) section on ‘Ensuring the Vitality of Town Centres’.
- 6.2.7. Paragraph 95 of the NPPF states that where an application fails to satisfy the sequential test it should be refused. However, that paragraph does not create a presumption against granting planning permission. Conflict with NPPF paragraphs 91 and 95 can be outweighed by other factors, such as the environmental, economic and social benefits of the development.
- 6.2.8. In addition, the PPG on ‘Town Centres and Retail’ provides further guidance on the application and interpretation of the sequential test. It is important to note that the sequential test is intended to implement the Government’s “town centre first” policy. This seeks to locate main town centre uses (including retail) in the most central sites possible. However, it is a “town centre first” policy, not a “town centre only” policy.
- 6.2.9. The PPG highlights at Reference ID: 2b-011-20190722 that: “The application of the test will need to be proportionate and appropriate for the given proposal.”

- 6.2.10. The PPG also identifies at reference ID: 2b-013-20190722 that in terms of viability:
- “The sequential test supports the Government’s ‘town centre first’ policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test.”*
- 6.2.11. In addition, the PPG states that it is for the applicant to demonstrate compliance with the sequential test (Paragraph: 011 Reference ID: 2b-011-20190722). The PPG sets out further considerations that should be considered when determining whether a proposal complies with the sequential test, based on the following:
- Has the suitability of more central sites to accommodate the proposals been considered, having regard to flexibility;
 - Is there scope for flexibility in the format and/or scale of the proposal; and
 - If there are no suitable sequentially preferable locations, the sequential test is passed.
- 6.2.12. In terms of the definition of ‘in centre and ‘edge of centre’, the NPPF Glossary (Annex 2) defines the town centre area as “defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.”
- 6.2.13. Finally in respect of edge of centre, it states that for “retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area.”
- 6.2.14. In terms of local planning policy, Local Policy DM13 of the Worthing Local Plan states that main town centre uses will be directed to designated centres, with paragraph g and h requiring that applicants promoting main town centre uses outside of defined centre to undertake a sequential assessment in line with national planning policy.

6.3 Relevant Case Law

- 6.3.1. In applying the sequential test, it is relevant to have regard to case law and precedent (including appeal decisions) which have helped to clarify the sequential test as it is intended under the NPPF and PPG. Case law clarifies the interpretation of policy and suitability, availability, and viability. The relevant case law and precedents are summarised below to provide a context to the application of the sequential test to the current proposals.
- 6.3.2. The established case law includes the Supreme Court Judgement *Tesco Stores Ltd v. Dundee City Council* (dated 21st March 2012), which has been regularly and comprehensively cited in terms of its clarity on the application of the sequential approach. The Judgement concluded that in order for a site to be considered ‘suitable’, conclusions should be based on a ‘real’ world assessment, and whether an alternative site is suitable for the development proposed, not whether the proposed development can be altered or reduced to fit alternative sites, making allowance for a reasonable degree of flexibility in terms of the format and scale of the proposed development.
- 6.3.3. In terms of availability, paragraph 91 of the NPPF requires the availability of sites to be considered. This is a point considered by several appeal decisions and Secretary of State decisions, including in an appeal by the Tollgate Partnership Ltd (ref. APP/A1530/W/16/3/147039) regarding a proposal for a mixed-use development comprising leisure and retail uses at Tollgate Village in Colchester.
- 6.3.4. Paragraph 12.3.18 of the appeal decision states:

“in terms of availability [the 2012 version of the] NPPF paragraph 24 asks whether town centre or edge of centre sites ‘are ... available’. That is at the date of the assessment. This was the approach of the SoS in Rushden Lakes and accords with the language and context of the sequential test.”

6.3.5. In these terms, and for a sequentially preferable site to be deemed “available”, it must be available now, rather than at some undetermined period in the future. As such for a site to be deemed ‘available’, it must be available in the short term, rather than at some undetermined period in the future.

6.3.6. The Supreme Court Case involving Tesco and Dundee Council also previously considered the definition of ‘suitability’ and the degree to which an application should demonstrate flexibility. The decision concluded that:

“...the Council were correct to proceed on the basis that ‘suitable’ meant ‘suitable for the development proposed by the applicant’. It stated: “The natural reading of each policy is that the word “suitable”, in the first criterion, refers to the suitability of sites for the proposed development: it is the proposed development which will only be acceptable if no suitable site is available more centrally” [Paragraph 25].

“...To refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer” [Paragraph 28].

6.3.7. Furthermore, an appeal in January 2019 for a foodstore in Gillingham, Dorset, the Inspector was clear that in applying the sequential approach at paragraph 29 that:

“The question is whether any suggested alternative site is suitable and available for the broad type of development currently proposed. In terms of size, type and range of goods, incorporating the requirement for flexibility.”

6.3.8. In summary, to be an appropriate alternative site, it must be able to accommodate a 372sqm GIA retail unit, albeit allowing for flexibility in terms of scale and format. Below we consider the parameters for our site search in more detail.

6.4 Methodology

6.4.1. This sequential assessment has focussed on assessing sites within and on the edge of the Town Centres within Worthing. Given the size of the store and relatively limited range of products, customers will visit the store on foot and will not walk significant distances to shop at a retail unit. A 300m catchment is, therefore, deemed sufficient to base the sequential test on. This includes Broadwater District Centre and the Downlands Shopping Parade. Although the Worthing Town Centre is outside of this radius, for completeness and following from the Council’s pre-application response, we have also included Worthing Town Centre within our assessment.

6.4.2. In line with the need for flexibility as stipulated in the NPPF, we have assessed sites that have a site area of +/-10% of the proposed unit size (372sqm GIA). This, therefore, includes sites or vacant units between 335sqm – 409sqm GIA.

6.4.3. The requirements for a sequentially preferred site are also as follows:

- The ability to sell bulky goods from a minimum of 335sqm.

- A demised at grade customer car park of an appropriate size is required directly adjacent to the retail unit to allow the safe and direct transfer of goods from store to customer vehicle, in particular for the purchase of bulky goods.
- Good accessibility to the strategic highway network and/or in close proximity to other bulky goods store operators providing customers with an ability to compare goods and prices.
- The floorspace should be at a single level on a single floor with minimal structural interruptions e.g. columns and pillars to allow for the store to be laid out more like a showroom, selling bulky goods;
- Suitable delivery and servicing access and arrangements;
- Have an active frontage;
- Minimum floor to ceiling height of 2.8-3m; and
- Available within the short term.

A site must meet all of these requirements in order to provide a sequentially preferable alternative site that meets the operators' requirements and business models.

In searching for sequentially preferable sites, we have used the following resources:

Adopted and Emerging Local Plans (including associated proposals maps);

Site visits; and

Online Letting Agents.

- 6.4.4. The below sets out the findings of the sequential assessment, including an overview of sites that were found and considered, but discounted due to unsuitability.

6.5 Local Plan Allocated Sites

- 6.5.1. There are fourteen sites in the Worthing Local Plan (2023) that are allocated for development. We have considered the three sites highlighted by the LPA in the pre-application consultation response for this application (LPA ref. PREAPP/0460/24). These sites are as follows:

- A7 Grafton.
- A11 Stagecoach, Marine Parade.
- A13 Union Place.

A7 Grafton

- 6.5.2. The Grafton site is 7,600sqm, and is previously developed site located on the seafront within Worthing Town Centre. The site comprises a 430-space multi-storey car park, a ten-pin bowling alley, several retail units, a basement service yard, and upper-level ramps providing access to rooftop parking decks. The site has long been identified by the Council as a key opportunity for comprehensive mixed-use redevelopment. The strategic ambition for the site includes a mix of commercial, leisure, retail and residential uses, with improved public realm and stronger integration between the town centre and the seafront.
- 6.5.3. The Worthing Local Plan (2023) identifies a delivery timeframe of up to five years for the redevelopment of the site. However, no formal planning application has been submitted, and there is currently no developer in place or active proposals being progressed. The site also remains partially operational, with existing tenants in situ and the multi-storey car park in daily use. Any

redevelopment would involve decanting existing tenants, decommissioning the parking infrastructure, and navigating complex site constraints. The scale of intervention required would necessitate significant upfront capital investment, lengthy site preparation, and extended construction phases, all of which push delivery well beyond what could reasonably be considered a “short term” timeframe in planning terms.

- 6.5.4. The proposed bulky goods retail store cannot unlock this site or deliver the Council's broader regeneration objectives. Nor is it viable for the applicant to wait for an unknown third-party developer to bring forward a comprehensive scheme in which the proposed store could eventually form one element. This makes the site unsuitable and unviable for the specific format proposed. Moreover, the significant uncertainty regarding timescales, funding, and delivery partners confirms that the site is not available now.
- 6.5.5. In this case, the Grafton site fails on all counts: it is unavailable, unsuitable for bulky goods retail without fundamental redesign, and unviable due to the cost, complexity, and timescale of redevelopment.
- 6.5.6. In contrast, the proposed site within the retail park is immediately deliverable, not subject to site-specific development requirements or active tenant occupation and is capable of accommodating the form and scale of retail development proposed without requiring major public investment or long-term phasing. It therefore represents a more appropriate location in sequential terms.
- 6.5.7. For these reasons, the Grafton site should be discounted from the sequential assessment. It is not available, suitable, or viable, and therefore does not constitute a reasonable alternative for the proposed development.

A11 Stagecoach, Marine Parade

- 6.5.8. This previously developed site is 6,900sqm and occupies a prominent seafront location adjacent to a Conservation Area and in close proximity to the Grade II* listed Dome Cinema. The Council has long-standing aspirations for its redevelopment into a high-quality mixed-use scheme, as outlined in the Seafront Masterplan and Worthing Borough Council's Investment Prospectus. These aspirations reflect the need for any redevelopment to be sensitive to the site's heritage context and contribute positively to placemaking objectives.
- 6.5.9. Unlocking the site requires relocation of the existing operational bus depot. To this end, the Council continues to work with the landowner (Stagecoach) to identify a viable alternative site for the depot's relocation. However, no planning application for redevelopment has been submitted to date, and no public commitment has been made by Stagecoach to vacate the site within a defined timescale.
- 6.5.10. The Worthing Local Plan (adopted 2023) anticipates that this site will not be delivered within the first six years of the plan period (i.e. by 2036). There is no planning permission in place, no active marketing of the land, and no legal or commercial mechanism in place to enable its early release. The land remains in operational use and is not available for sale. The applicant cannot facilitate the site's availability, nor influence the relocation of the existing depot — a fundamental pre-condition for redevelopment.
- 6.5.11. The proposed bulky goods retail store cannot unlock this site or deliver the Council's broader development objectives. Nor is it viable for the applicant to wait for an unknown third-party developer to bring forward a scheme in which the proposed store could eventually form one element. This makes the site unsuitable and unviable for the specific format proposed. Moreover,

the significant uncertainty regarding timescales, funding, and delivery partners confirms that the site is not available now.

- 6.5.12. In this case, the Stagecoach site fails on all counts: it is unavailable, unsuitable for bulky goods retail without fundamental redesign, and unviable due to the cost, complexity, and timescale of redevelopment.
- 6.5.13. In contrast, the proposed site within the retail park is immediately deliverable, not subject to site-specific development requirements or active tenant occupation and is capable of accommodating the form and scale of retail development proposed without requiring major public investment or long-term phasing. It therefore represents a more appropriate location in sequential terms.
- 6.5.14. For these reasons, the Stagecoach site should be discounted from the sequential assessment. It is not available, suitable, or viable, and therefore does not constitute a reasonable alternative for the proposed development.

A13 Union Place

- 6.5.15. The site is 11,200sqm and comprises a surfaced car park, a cleared area of unmade ground and footings, and an adjoining car park fronting the High Street. In an effort to catalyse redevelopment, Worthing Borough Council acquired the site in 2018. On 12 August 2024, planning permission was granted for a significant mixed-use scheme comprising 216 residential apartments flexible commercial floorspace at ground level, residential car and cycle parking, communal gardens, a replacement public car park, and public realm enhancements (LPA ref. AWDM/1618/23). The development ranges from four to 11 storeys in height and includes 507sqm of flexible Class E floorspace, which could theoretically accommodate a range of uses including retail, café, office, gym, and health services. The developer, Roffey Homes, has stated on their website that construction is expected to commence in summer 2025, with phased completions from early 2028 onwards.
- 6.5.16. Despite having planning permission, the scheme is at a very early stage and faces significant practical and legal barriers to delivery in the short term. All pre-commencement conditions remain outstanding, except for condition 12 (watching brief relating to archaeology) which was only partially discharged in April 2025. Critically, condition 3 requires one or more third parties to have a legal interest in the site before development can begin, which hinges on the successful disposal of the land by the Council to a private party. This process of identifying a buyer, negotiating terms, and completing the legal transfer is likely to be protracted and introduces considerable uncertainty. In addition, there are a number of S106 obligations that must be satisfied, further delaying commencement.
- 6.5.17. Even assuming prompt progress, with pre-commencement conditions being discharged within the eight-week timeframe (once submitted) but not accounting for the time required to prepare and submit the applications themselves, or the prerequisite disposal of the site, we do not consider the developer's stated target of a summer 2025 start date to be realistic. This casts doubt on the anticipated completion timeframe of 2028, but in any event, confirms that the site will not be available within the short term.
- 6.5.18. In short, given the scale and complexity of the scheme, the extent of outstanding pre-commencement conditions, and the need for legal agreements to be secured prior to development, there is no realistic prospect of the site being delivered within the short term.

- 6.5.19. Accordingly, the site is not sequentially preferable. It is neither available within a reasonable timescale, nor suitable or viable for the type of bulky goods retail floorspace proposed. It cannot accommodate the development proposed and therefore, should not be considered as a reasonable alternative for the purposes of the sequential test.

6.6 Site Assessment of Worthing Town Centre

- 6.6.1. A comprehensive assessment of all known available commercial properties within Worthing Town Centre has also been undertaken as part of the sequential test process. This has involved a thorough desktop review of commercial property websites, agent listings, site visits in Worthing and site measurements to identify units which are either available now or could reasonably become available in the short term. The full schedule of sites considered is set out in Appendix A.
- 6.6.2. The sites listed below have been selected for more detailed commentary as they appeared, on a high-level review, to potentially offer a closer fit for the type of large-format bulky goods retail floorspace proposed. However, on closer examination, all have been discounted due to a combination of issues relating to their size, layout, access, visibility, delivery and servicing constraints, or availability.

- 56 Montague Street, Worthing BN11 3HE
- 97-99 Montague Street, Worthing, BN11 3BN
- 105-109 Montague Street, Worthing BN11
- 82-84 Montague Street, Worthing, West Sussex, BN11 3HF
- 10 High Street, Worthing, West Sussex BN11
- The Mill Building, 31 Chatsworth Rd, Worthing BN11 1LY
- 6-8 New Street, Worthing, West Sussex, BN11 3BT
- 21 Rowlands Road, Worthing, West Sussex, BN11 3JJ
- 79-81 Portland Road, Worthing BN11 1QG
- 56 Montague Street, Worthing BN11 3HE
- 40 Marine Parade, Worthing, West Sussex, BN11
- Ridgeworth House, Liverpool Gardens, Worthing, BN11 1RY

- 6.6.3. These issues render each of the sites unsuitable, unavailable, or unviable for the proposed development and they therefore fail the sequential test.

56 Montague Street, Worthing BN11 3HE

- 6.6.4. This property is for sale and comprises a four-storey building with a ground floor retail unit extending to approximately 1,953sqm. The upper floors consist of vacant former ancillary retail space (approx. 2,681sqm), though not suitable for the proposal which requires ground floor access and large unobstructed areas to manoeuvre bulky goods around. The freehold is currently advertised for sale, and the ground floor is leased to Poundland until 22 June 2028.
- 6.6.5. The ground floor unit is too large for the applicant's needs and, is not currently available to the applicant, and subdivision would not be possible while the lease remains in place. There is also no dedicated customer parking or scope to deliver at-grade servicing for bulky goods. The site is not within a cluster of comparable bulky goods retailers, limiting its attractiveness to the intended customer base. As such, the site is neither available in the short term, nor suitable or viable for the proposal.

97-99 Montague Street, Worthing, BN11 3BN

- 6.6.6. This site comprises a ground floor retail unit of approximately 909sqm. The site in its current configuration is too large for the applicant's needs. The site would be of a more suitable size if the unit were to be subdivided. However this would not solve the other outstanding issues including the lack of associated customer parking and no feasible opportunity to provide such parking in this tightly constrained town centre location. The lack of at-grade delivery access presents operational challenges for large-scale bulky goods retail, which relies heavily on direct-to-store logistics and high customer turnover. In addition, the unit is not situated within a retail environment characterised by bulky goods stores, limiting its ability to attract comparison shoppers.
- 6.6.7. For these reasons, the site is unsuitable and unviable for the proposal.

105-109 Montague Street, Worthing BN11

- 6.6.8. This site comprises 585sqm of office space across first and second floor levels, accessed via a shared ground floor entry. However, it does not provide ground floor frontage or the visibility necessary for a bulky goods retailer. The internal configuration is wholly unsuited to retail use, and structural alterations would be required to make the space accessible and compliant with operational needs. There is also no dedicated parking or servicing, and the elevated position of the floorspace further exacerbates access issues.
- 6.6.9. The site fails to meet the fundamental requirements of the proposed development and is therefore unsuitable.

82-84 Montague Street, Worthing, West Sussex, BN11 3HF

- 6.6.10. This mid-terrace unit comprises approximately 296sqm of retail floorspace over ground and first floor levels. Located within the pedestrianised section of Montague Street, the unit lacks vehicular access for deliveries and customer parking. Its small footprint is well below the minimum threshold required for the proposed use, and its internal layout limits any opportunity for meaningful extension or adaptation. The unit is also currently under offer, suggesting it is no longer available.
- 6.6.11. As a result, the site is unavailable, unsuitable, and unviable.

10 High Street, Worthing, West Sussex BN11

- 6.6.12. The site comprises a former church which has been converted into a nightclub. The internal layout includes a large open ground floor area with a mezzanine balcony and rear loading access.
- 6.6.13. While the unit comprises a gross internal area of approximately 607sqm, which could theoretically accommodate the proposed store, the internal configuration is heavily tailored to its current nightclub use. The mezzanine and associated staircases significantly limit the useable floorplate and would require costly and extensive alterations to accommodate a bulky goods format.
- 6.6.14. Furthermore, there is no capacity to provide on-site customer parking and the site is located away from the established bulky goods retail cluster, limiting potential for cross-shopping or comparison trips.
- 6.6.15. The unit is, therefore, considered unsuitable and unviable for the proposed use due to its configuration, lack of on-site car parking and isolated location from other similar operators.

The Mill Building 31-35 Chatsworth Road, Worthing

- 6.6.16. The unit for let is located on the upper floor of the Mill Building which comprises a large mixed-use block within the Town Centre. The unit is advertised as office floorspace for rent. The premises include shared amenities, meeting rooms, and hot desking facilities within approximately 743sqm of space.
- 6.6.17. While the overall floor area is technically sufficient to accommodate the proposed use, the unit's location on upper floors, lack of direct ground-floor access, and absence of an active frontage render it unsuitable for retail use, particularly for a bulky goods store which requires direct access for customers and large deliveries.
- 6.6.18. The office-based fit-out, structural columns, and layout further restrict any practical conversion to retail without significant and impractical intervention.
- 6.6.19. For these reasons, the site is unavailable, unsuitable and unviable for the proposed development.

6-8 New Street, Worthing, West Sussex, BN11 3BT

- 6.6.20. This former bar and restaurant is arranged over two levels with a large open-plan dining area, ancillary kitchen space and some external seating. The first floor includes storage and office space.
- 6.6.21. Although the building provides around 410sqm of floorspace in total, the split-level layout and need for substantial internal reconfiguration limit the practicality of the site for bulky goods retail use. In particular, ceiling heights and stair access points restrict the type of retail display and movement of goods that can take place.
- 6.6.22. The building also lacks any off-street car parking, making it unsuitable for the car-based shopping trips typically associated with bulky goods.
- 6.6.23. Accordingly, the site is unsuitable and unviable to meet the requirements of the proposed store.

21 Rowlands Road, Worthing, West Sussex, BN11 3JJ

- 6.6.24. The building is a four-storey end-of-terrace townhouse with commercial space at ground floor level, a basement used for bar storage, and a maisonette across the upper floors.
- 6.6.25. With a total area of around 300sqm split across multiple levels, the ground floor only extends to 121sqm and therefore the site falls below the minimum threshold for the proposed development. The split-use nature of the building, combined with the narrow floorplate and vertical circulation, presents significant operational and layout challenges.
- 6.6.26. In addition, the rear garden extension offers limited potential for conversion or use as customer parking, and the site is not located near other bulky goods retailers to allow for linked trips.
- 6.6.27. Overall, the building is too small, fragmented and constrained to deliver the type of retail floorspace required, and is therefore unsuitable and unviable.

40 Marine Parade, Worthing, West Sussex, BN11

- 6.6.28. This site comprises a four-storey Victorian villa located on Worthing seafront, with a bar/restaurant on the ground floor and residential uses above. The ground floor commercial unit is currently under refurbishment for a new tenant.

- 6.6.29. The site has an active frontage and a ground floorspace of approximately 411sqm, but the layout is heavily fragmented due to the building's historic form. The internal arrangement, including partition walls, servicing constraints and vertical circulation to the residential upper floors, limit the adaptability of the space.
- 6.6.30. While some conversion might theoretically be possible, the residential uses above pose long-term operational and planning constraints. There is also no capacity to provide car parking within the site or adjacent land.
- 6.6.31. On this basis, the site fails to meet the requirements for the proposed store and is unavailable, unsuitable and unviable.

Ridgeworth House, Liverpool Gardens, Worthing, BN11 1RY

- 6.6.32. Ridgeworth House is a purpose-built office block extending across four floors with approximately 30 dedicated parking spaces to the rear. The site is currently for sale on a freehold basis, but it is fully let until 2027.
- 6.6.33. While the ground floor could, in theory, be adapted for retail use and includes sufficient space and visibility to provide an active frontage, the freehold nature of the offer and full occupation until 2027 makes it unavailable in the short term.
- 6.6.34. The cost, complexity, and long lead-in time required to secure vacant possession and convert the space mean that the site cannot be considered realistically available. There is also no evidence that the site would be marketed for retail use, nor any confirmation that delivery and servicing could be made suitable for large-scale goods.
- 6.6.35. For these reasons, the site is unavailable, unsuitable and unviable.

6.7 Site Assessment of Downlands Shopping Parade Local Centre

- 6.7.1. A review of the Downlands Shopping Parade Local Centre and its surrounding area has confirmed that there are no sites within the centre or its edge that are available, suitable, or viable to accommodate the proposed bulky goods retail store. The Local Centre is small in scale, primarily comprising convenience retail and service-based units, with no vacant land or redevelopment opportunities identified during the site visit or wider property search.

6.8 Site Assessment of Broadwater District Centre

- 6.8.1. One site was identified on the edge of the Broadwater District Centre search area:
- 6.8.2. Unit E Northbrook Trading Estate, Northbrook Road, Worthing, West Sussex BN14 8PN
- 6.8.3. This unit measures approximately 233sqm and falls significantly below the minimum floor area requirement needed for the proposal. While its industrial form suggests it could meet operational requirements such as servicing, parking, and ceiling heights, the unit does not meet critical qualitative criteria. These include the need for active frontage, sufficient internal layout, and appropriate adjacency to complementary retail uses to support linked trips. It is also divorced from the established retail context of the district centre, reducing its suitability for a customer-facing bulky goods operation.
- 6.8.4. As such, the site is not suitable or viable to meet the functional and locational needs of the proposed store and has therefore, been discounted from further consideration.

6.9 Conclusions

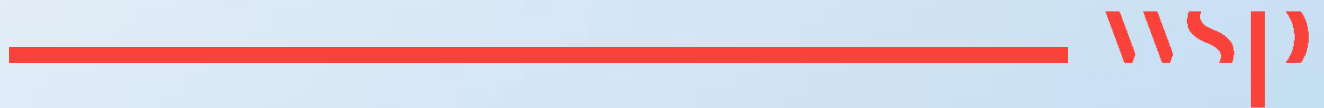
- 6.9.1. A thorough and proportionate assessment of potentially sequentially preferable sites has been undertaken, in line with the requirements of the NPPF and relevant local planning policy SS3 and DM13. The assessment has applied a reasonable degree of flexibility in terms of site size, format, and location, consistent with national policy guidance.
- 6.9.2. The exercise included a detailed review of site allocations within the Worthing Local Plan, supported by on-the-ground site visits, desk-based research using local property websites, and consultation with local agents. This robust methodology ensured that all realistic options were explored. Sites within and on the edge of Worthing Town Centre, Broadwater District Centre, and Downlands Shopping Parade Local Centre were reviewed.,
- 6.9.3. The findings are set out in full in Appendix A. A short selection of potentially relevant sites was appraised in more detail within the body of this report. However, none of the sites assessed were found to be suitable and available for the proposed development when considered against the operational and locational requirements of a bulky goods retail store. Issues identified across the sites included insufficient floor area, poor layout and servicing potential, lack of appropriate parking provision, and a lack of synergy with surrounding uses. In some instances, sites were constrained by existing uses, planning designations or had no realistic potential for redevelopment in the short term.
- 6.9.4. The application site at Lyons Farm Retail Park comprises a parcel of vacant land, located within an established retail park setting. It is immediately available, of a suitable size, and capable of accommodating the proposed development. It benefits from good accessibility, on-site parking, and is adjacent to existing bulky goods retailers, facilitating linked trips and customer comparison shopping.
- 6.9.5. The proposed store is intended to complement the existing retail offer within the park and is consistent with established patterns of bulky goods retailing, where such uses often operate successfully in edge-of-centre or out-of-centre locations due to format and floorspace requirements. It is also expected to reduce the need for longer-distance travel by retaining more comparison goods expenditure within Worthing.
- 6.9.6. In summary, taking into account the detailed site-by-site assessment and policy context, it is concluded that there are no sequentially preferable sites within or on the edge of the centres assessed that are both suitable and available. As such, the proposal satisfies the requirements of the sequential test set out in the NPPF and adopted local policy. The principle of development on this site should, therefore, be supported.

7 SUMMARY AND CONCLUSIONS

- 7.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 7.1.2. This Planning Statement has assessed the Proposed Development against the Development Plan as well as relevant national and regional planning policy and guidance. The proposals are considered to be in accordance with the Development Plan.
- 7.1.3. As outlined within Section 6 of this Statement, a thorough and proportionate assessment of potentially sequentially preferable sites has been undertaken, in line with the requirements of the NPPF and Worthing Local Plan Policies SS3 and DM13. The assessment has applied a reasonable degree of flexibility in terms of site size, format, and location, consistent with national policy guidance but found that none of the sites assessed were found to be suitable and available for the Proposed Development.
- 7.1.4. The Site within Lyons Farm Retail Park comprises a parcel of vacant land, located within an established retail park setting. It is immediately available, of a suitable size, and capable of accommodating the Proposed Development. It benefits from good accessibility, on-site parking, and is adjacent to existing bulky goods retailers, facilitating linked trips and customer comparison shopping.

Appendix A

FULL SEQUENTIAL ASSESSMENT OF SITES – WORTHING TOWN CENTRE





CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	Zoopla	105-109 Montague Street, Worthing BN11	586	Office Space	Y	N	N	Although available, the unit is currently configured as above ground floor office space and does not meet the criteria for selling bulky goods. It lacks suitable at-grade car parking and delivery access. Fails sequential test.	F
Worthing Town Centre	Zoopla	10 High Street, Worthing, West Sussex BN11	607	Nightclub	Y	N	N	The site is a former nightclub and does not offer proximity to other bulky goods stores. There is no demised customer car parking or suitable servicing arrangements. Fails sequential test.	F
Worthing Town Centre	Rightmove	Chapel House Business Centre, 1-6 Chapel Road, Worthing, West Sussex BN11 1AY	Up to 260	Office Space	Y	N	N	Located on the second floor, it fails the requirement for ground-floor retail with active frontage and direct customer loading access. Fails sequential test.	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	<u>Rightmove</u>	The Mill Building 31-35 Chatsworth Road, Worthing	Up to 743	Office Space	Y	N	N	Although the floor area is sufficient, the internal layout includes cubicles, pillars, and lacks open plan space. It is not at ground level and does not provide an active frontage. Fails sequential test.	F
Worthing Town Centre	<u>Rightmove</u>	6-8 New Street, Worthing, West Sussex, BN11 3BT	410	Restaurant	Y	N	N	While above the minimum size, this former restaurant includes a mezzanine and kitchen with structural intrusions that compromise single-level trading. Fails sequential test.	F
Worthing Town Centre	<u>Rightmove</u>	30 Montague Street, Worthing, West Sussex, BN11 3HA	251	Retail	Y	N	N	At only 251 sqm, the unit is below the required minimum size and has internal pillars, restricting flexibility for bulky goods. Fails sequential test	F
Worthing Town Centre	<u>Rightmove</u>	6 Railway Approach, Worthing, West Sussex, BN11	242	Office	Y	N	N	This office unit lacks ground-floor access, an active frontage, and appropriate layout or servicing for bulky goods retail. Fails sequential test.	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	Zoopla	Ground Floor 56 Montague St, Worthing BN11 3HE	1,917	Retail	N	Y	N	Sale of freehold of the unit however the leasehold with the retailer Poundland is in agreement until 22 June 2028. Therefore, the site is not available in the short term despite being suitable in terms of size, openness, and delivery arrangements. The site does not have an ancillary car park. Fails sequential test.	F
Worthing Town Centre	NovaLoca/SHW	First Floor 56 Montague St, Worthing BN11 3HE	1550	Retail/ Leisure	Y	N	N	The site is on the first floor without an active frontage. While it meets size requirements, it does not meet the rest of the parameters. Fails sequential test.	F
Worthing Town Centre	Rightmove	Unit 6 Dominion Trade Centre, Dominion Way West, Worthing, West Sussex, BN14	240	Light Industrial / Warehouse Unit	Y	N	N	With only 240 sqm, the site does not meet the minimum size requirement. It also lacks confirmation of servicing, layout, and customer parking arrangements. Fails sequential test.	F
Worthing Town Centre	Rightmove	21 Rowlands Road, Worthing, West Sussex, BN11 3JJ	300	Commercial/ Residential	Y	N	N	Although partially ground floor, the space is split across four levels, preventing the single-level open trading required. Fails sequential test	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	<u>Rightmove</u>	40 Marine Parade, Worthing, West Sussex, BN11	411	Bar/ Restaurant	Y	N	N	This building includes multiple upper floors and residential accommodation, making it unsuitable for conversion to bulky goods retail with dedicated parking and servicing. Fails sequential test.	F
Worthing Town Centre	<u>SWH</u>	Arcade Buildings, 8-9 South Street, Worthing, West Sussex, BN11 3AL	278	Retail	Y	N	N	Comprising 278 sqm split across floors, the unit lacks a single-level layout and does not provide adequate structural openness or customer parking. Fails sequential test.	F
Worthing Town Centre	<u>SWH</u>	82-84 Montague Street, Worthing, West Sussex, BN11 3HF	296	Retail	Y	N	N	At 296 sqm, the unit falls short of the size requirement and is split across levels, with no indication of adequate delivery access or parking. Fails sequential test	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	Zoopla	79-81 Portland Road, Worthing BN11 1QG	464	Public House	Y	N	N	While the site meets the size requirements needed, the site is a Grade II listed building which would not be able to be altered of extended to meet the other parameters of openness of ground floor, parking, delivery and access, or proximity to similar bulky good stores. Fails sequential test	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	<u>NovaLoca/</u> SHW	97-99 Montague Street, Worthing, BN11 3BN	909	Retail	Y	N	N	The site is ground floor retail unit which meets the minimum size requirements, however there is no opportunity to create a customer car park, nor is the site in close proximity to other bulky good stores for customer comparison Fails sequential test	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	<u>NovaLoca/ SHW</u>	38-42, Portland Road, Worthing, BN11 1QN	235	Retail	Y	N	N	At 235sqm the site is too small for the proposed development, it lacks a car park, and the ceiling height is too low. While The site is on the ground floor with an active frontage it does not mee the parameters. Fails sequential test.	F



CENTRE	SOURCE	ADDRESS	SITE AREA (SQM)	CURRENT LAND USE	AVAILABLE	SUITABLE	VIABLE	COMMENTARY	PASS OR FAIL
Worthing Town Centre	<u>NovaLoca/ Justice&Co</u>	Ridgeworth House, Liverpool Gardens, Worthing, BN11 1RY	1858	Office	N	Y	N	Sale of freehold of Ridgeworth House, a purpose-built office building arranged over ground, first, second and third floor levels, with private car park for approximately 30 vehicles located at the rear. There are currently three tenants occupying all floors. The tenancies do not end until 2027. While the ground floor is of a suitable size with the ability to create and active frontage, the applicant is not looking to take on the burden of a freehold of such significant size, nor is the ground floor available in the short term. There is currently do suitable delivery and servicing for bulky goods. Fails sequential test	F
Broadwater	<u>Rightmove</u>	Unit E Northbrook Trading Estate, Northbrook Road, Worthing, West Sussex BN14 8PN	233	Industrial Park	Y	N	N	At 233 sqm, this unit is below the required floor area threshold. While industrial in nature, it does not meet the size and fit-out criteria for the proposed retail format. Fails sequential test.	F



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