



APPLICATIONS & APPEALS SERVICES

**24 UPPER HIGH STREET
WORTHING
BN11 1DL**

**SUPPORTING PLANNING, DESIGN AND ACCESS
STATEMENT**

MAY 2026



CONTENTS	PAGE
1. INTRODUCTION	2
2. PHYSICAL CONTEXT	3
3. PLANNING HISTORY & PROPOSAL	6
4. PLANNING POLICY CONTEXT	10
5. DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT	16
6. LAYOUT, DESIGN AND APPEARANCE	20
7. NATURAL ENVIRONMENT	21
8. ACCESS AND PARKING	25
9. CONCLUSION	29

1. INTRODUCTION

1.1 Planning permission is sought for the erection of a mixed-use community hub comprising modular shipping container buildings, together with ancillary works at 24 Upper Street, Worthing, BN11 1DL.

1.2 This Supporting Statement addresses the design and access issues as well as relevant planning policy, having regard to the requirements of the Town and Country Planning (Development Management Procedure) Order 2015. The details of the proposals will be described and appraised having regard to the following aspects:

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – the planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed development;
- **Amount** – the extent of development on the site;
- **Scale** – the physical size of the development;

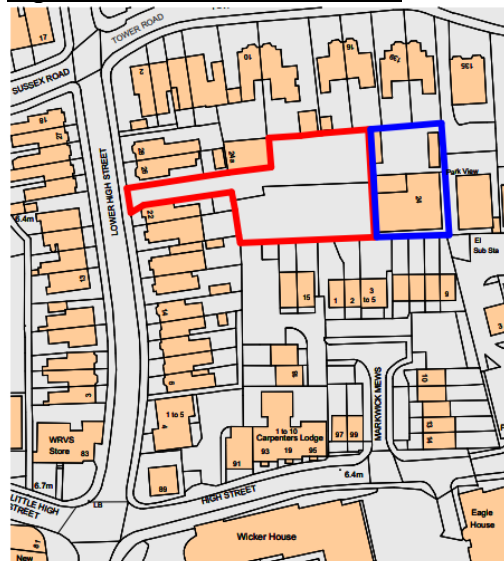
- **Layout** – the relationship of the proposal to neighbouring properties;
- **Appearance** – details of materials, style and impact upon the visual amenities of the area;
- **Landscape** – impact of the proposal on the existing landscape;
- **Access** – access to the development and parking provision.

1.3 The Council is requested to consider this Statement alongside the submitted plans and this demonstration that the proposed development accords with the relevant planning policies and is acceptable in all respects. It is hoped that the Council will support the proposal and grant planning permission.

2. PHYSICAL CONTEXT

- 2.1 The application site comprises approximately 0.12 hectares and is currently an underutilised NCP car park. The site is situated to the east of Upper High Street and lies within the Built-Up Area Boundary of Worthing. It is accessed via an existing vehicular and pedestrian route from Upper High Street, which forms a well-established urban street connecting directly to Worthing town centre.

Figure 2.1 - Site Location Plan



Source: Philips Surveyors (2026)

- 2.2 The surrounding area is characterised by a dense and mixed urban form, comprising residential properties, commercial premises and community uses. Residential dwellings are located immediately to the north, south and east of the site, with a children's nursery and other town centre uses located nearby, reflecting the mixed-use character of the area.
- 2.3 The site currently accommodates a mix of hardstanding, parking areas and existing buildings, including container-based structures, and is considered underutilised in its current form. The site is largely enclosed by surrounding built form, resulting in a contained and backland townscape setting with limited visibility from the wider public realm.
- 2.4 Owing to its central location, the site benefits from a high level of accessibility and is well served by public transport, pedestrian routes and local services within walking distance. The site therefore represents a highly sustainable location for redevelopment in accordance with the spatial strategy of the Worthing Local Plan.
- 2.5 The site is not designated for its ecological or landscape value and it is wholly located in Flood Zone 1. There are no trees

located on the site. A mains sewer pipe runs underneath the site, this would not be impacted as a result of the proposal.

2.6 The following photographs provide views of the site and its context.



Internal View of Site Looking West Towards Upper High Street (NCP Car Park on Left)



Internal View of Site Looking East (NCP Car Park on Right)



Internal View of Site Looking South into NCP Car Park



Internal View of Site Looking East within NCP Car Park



Internal View of Site Looking West within NCP Car Park



Internal View of Site Looking North within NCP Car Park

3. PLANNING HISTORY

car port and container store. *Application Permitted.*

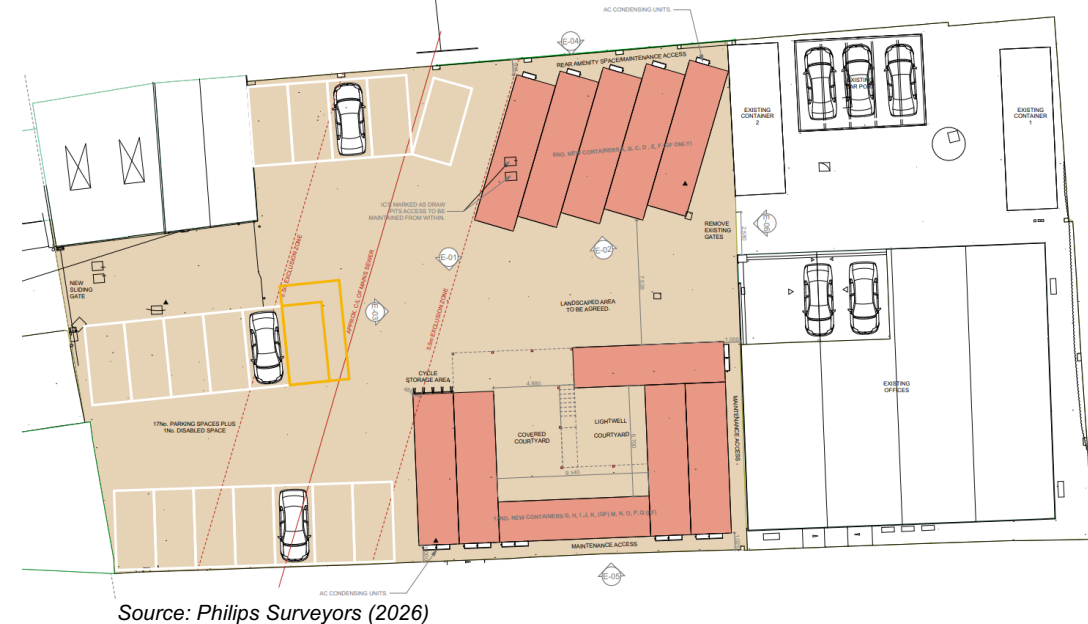
3.1 The application site lies within the administrative area of Adur and Worthing District Council for planning purposes. An inspection of the planning register reveals the following relevant planning history for the site:

- **90/00775/FULL** - Retention of two temporary stores for building materials and four portacabins. *Application Permitted.*
- **94/05808/FULL** - Redevelopment of the Site with a Single Storey Storage Building With Ancillary Office Accommodation and Associated Parking. *Application Permitted.*
- **95/05801/FULL** - Reposition Car Park Gates and Provide Security Fence. *Application Permitted*
- **AWDM/0186/24** - Change of Use of storage and ancillary office building Class B8 to Class E including external alterations and provision of a

4. PROPOSAL

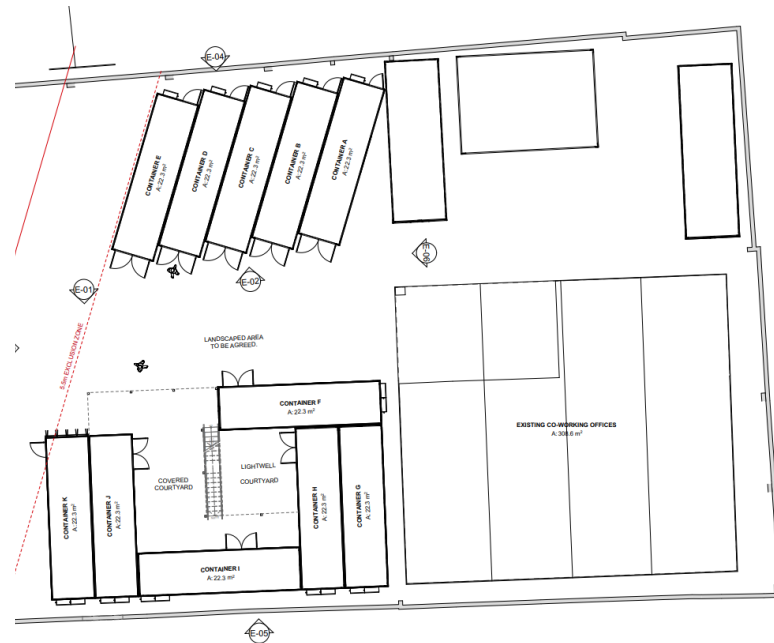
- 4.1 Planning permission is sought for the installation of modular shipping container buildings to form a mixed-use community and employment hub at 24 Upper High Street, Worthing. The proposal will deliver a flexible and adaptable form of development providing affordable workspace, creative studios and community-focused uses within a sustainable, modular format.
- 4.2 The development comprises 17no. 30ft shipping containers arranged across ground and first floor levels, accommodating a mix of uses including flexible offices (Class E(g)), artist studios and gym and wellness facilities (Class E(d)) and a community café (Class E(b)), together with the provision of 17no. car parking spaces (including one disabled space). The scheme is intended to support small businesses, creatives and the local community by providing accessible workspace and complementary social and wellbeing uses within a town centre location.

Figure 4.1 - Proposed Layout Plan



- 4.3 At ground floor level, the layout incorporates a series of container units alongside retained existing office floorspace (within blue line boundary), organised around a central covered courtyard and adjoining open courtyard. This space will act as the primary circulation route and focal point for the development, facilitating informal interaction, outdoor seating and community activity. A landscaped area is also proposed to enhance visual amenity and biodiversity within the site.

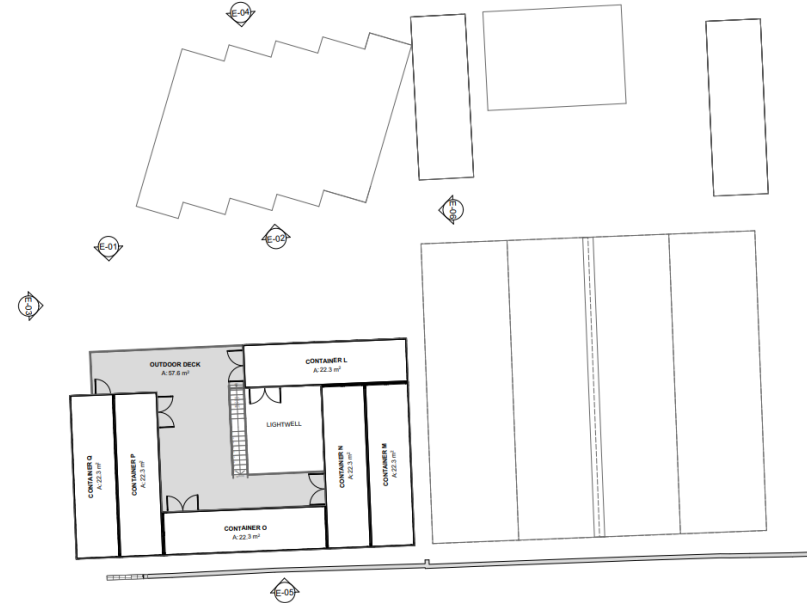
Figure 4.2 - Proposed Ground Floor Plan



Source: Philips Surveyors (2026)

- 4.4 First floor accommodation comprises additional container units together with an external deck area, providing further flexible workspace and amenity space. The upper level is accessed via external staircases, ensuring clear and legible circulation throughout the development.

Figure 4.3 - Proposed First Floor Plan



Source: Philips Surveyors (2026)

- 4.5 The layout has been informed by site constraints, including the presence of a mains sewer crossing the site, with a 5.5m easement maintained free from built development. The modular nature of the proposal enables the development to be delivered without permanent foundations, ensuring minimal ground disturbance and allowing for full reversibility of the scheme if required.

4.6 In design terms, the proposal adopts a contemporary modular approach, with containers finished in a varied colour palette and adapted to include glazing and active frontages. The arrangement of both single-storey and stacked containers creates visual interest. Boundary treatments include a new sliding entrance gate and the existing north boundary wall will be fitted with a fence to increase height up to 2m above ground level.

Figure 4.4 - Proposed Model Views



Source: Philips Surveyors (2026)

4.7 Sustainability is embedded within the proposal through the reuse of shipping containers, significantly reducing embodied

carbon. Roof-mounted solar photovoltaic panels will provide on-site renewable energy generation, reducing operational energy demand.

4.8 The scheme will incorporate energy-efficient design measures, including high levels of insulation and low-energy lighting, alongside mechanical plant (including air conditioning) to support year-round use. These elements will be integrated within the roofscape to minimise visual impact.

4.9 Permeable surfacing and soft landscaping are also proposed to assist with sustainable drainage and deliver biodiversity enhancements, ensuring the development represents a low-impact and resource-efficient form of development appropriate to its town centre location.

4.10 Associated works include access and circulation arrangements, cycle storage, servicing, lighting, and external seating areas within the courtyard. The development will also retain maintenance access routes and incorporate lightwells and circulation space to ensure a functional and accessible layout.

5. PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF) (December 2024)

Sustainable Development

- 5.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole.
- 5.2 Paragraph 2 of the NPPF sets out that ***'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements'***.

- 5.3 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has the following three overarching objectives which are independent but need to be pursued in mutually supportive ways:

- a) ***'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
- b) ***a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect*** current and future needs and

support communities' health, social and cultural well-being; and

- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy'.*

5.4 Paragraph 10 states ***'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (Paragraph 11).*** For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

5.5 Paragraph 12 of the Framework states that ***'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a***

planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not normally be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed'.

Building a Strong, Competitive Economy

5.6 Paragraph 85 planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

5.7 Paragraphs 86 and 87 of the NPPF require planning policies to set out a clear and proactive economic strategy that supports sustainable growth, aligned with national and local priorities. This includes identifying suitable sites and criteria for investment, facilitating the needs of a modern economy,

addressing barriers such as infrastructure or environmental constraints, and remaining sufficiently flexible to accommodate changing economic circumstances and new working practices.

- 5.8 Paragraph 87 further requires planning policies and decisions to recognise the specific locational requirements of different sectors, including supporting clusters of creative, knowledge-based and high-technology industries, providing for storage and distribution uses in appropriate locations, and enabling the expansion and modernisation of businesses that contribute to economic growth and resilience.

Plan and Decision Making

- 5.9 Paragraph 34 requires local plans and spatial development strategies to be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. In particular, 'Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the future'.

- 5.10 In terms of decision-making, the Framework states at paragraph 39 that ***'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'***.

Highways and Car Parking

- 5.11 Paragraph 109 requires transport issues to be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This is to ensure that (inter alia) the potential impacts of development on transport networks can be addressed.
- 5.12 Paragraph 112 states that if setting local parking standards for residential and non-residential development, policies

should take into account the accessibility of the development, its type, mix and use, the availability of land and opportunities for public transport, local car ownership levels and the need to ensure that adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

- 5.13 Paragraph 116 makes it clear that ***‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’***.

Effective Use of Land

- 5.14 Paragraph 124 requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring healthy living conditions.
- 5.15 Paragraph 125 states that planning policies and decision should encourage multiple benefits from both urban and rural land. Furthermore, paragraph 128 sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not

allocated for a specific purpose in plans where this would help to meet identified needs.

- 5.16 Paragraph 129 states that ***‘Planning policies and decisions should support development that makes efficient use of land.....’***

Design

- 5.17 In terms of design, Section 12 seeks to achieve well designed places sets out that the ***‘The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’*** (Paragraph 131).
- 5.18 Paragraph 135 further states that planning policies and decisions should ensure that developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development should also be sympathetic to local character and history and should be

designed with a high standard of amenity for existing and future users.

- 5.19 Paragraph 139 states that ***‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:***

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or***
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit with the overall form and layout of their surroundings’.***

Climate Change

- 5.20 Paragraph 161 requires the planning system to support the transition to a low carbon future and to taking into account flood risk. New development should be planned in ways which avoid increased vulnerability to the range of impacts arising from climate change (paragraph 164).

Biodiversity

- 5.21 Paragraph 192 requires the protection and enhancement of biodiversity and geodiversity. Paragraph 193 states that when determining planning applications, local planning authorities should avoid significant harm to biodiversity which should be adequately mitigated or, as a last resort, compensated for. Development should not result in the loss or deterioration of irreplaceable habitats unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Ground Conditions and Pollution

- 5.22 Paragraph 196 requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land

instability and contamination. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner (paragraph 197).

5.23 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment (paragraph 198).

Local Planning Policy

5.24 Planning policy for Adur and Worthing is set out in the Worthing Borough Council Local Plan 2020-2036 adopted in March 2023. The Plan sets out the long-term vision for Worthing's development to deliver the ambitions for Worthing to be a vibrant place to live and work. It sets out the Council's policies for the built and natural environment, housing, open space, employment, community facilities and more.

5.25 The policies of relevance to the proposal within the Plan are set out below. The requirements of the policies will be discussed in the Planning Assessment sections below.

- Policy SP1 – Presumption in Favour of Sustainable Development
- Policy SP2 – Climate Change
- Policy SS1 – Spatial Strategy
- Policy SS2 – Site Allocations
- Policy SS3 – Town Centre
- Policy DM5 – Quality of the Built Environment
- Policy DM6 – Public Realm
- Policy DM8 – Planning For Sustainable Communities/Community Facilities
- Policy DM9 – Delivering Infrastructure
- Policy DM10 – Economic Growth and Skills
- Policy DM11 – Protecting and Enhancing Employment Sites
- Policy DM13 – Retail and Town Centre Uses
- Policy DM15 – Sustainable Transport and Active Travel
- Policy DM16 – Sustainable Design
- Policy DM17 – Energy
- Policy DM18 – Biodiversity
- Policy DM20 – Flood Risk and Sustainable Drainage
- Policy DM21 – Water Quality and Sustainable Water Use

6. DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT

The Principle of Development

- 6.1 Paragraph 7 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, with economic, social and environmental objectives (paragraph 8). Paragraphs 10 and 11 establish a presumption in favour of sustainable development, with paragraph 38 confirming that decision-makers should seek to approve applications for sustainable development where possible.
- 6.2 This approach is reflected locally in Worthing Local Plan Policy SP1, which confirms that proposals that accord with the development plan will be approved without delay, unless material considerations indicate otherwise. The policy supports development that contributes towards sustainable communities, economic growth and the efficient use of land.
- 6.3 Worthing Local Plan Policy SS1 sets out the spatial strategy for development, directing growth towards the built-up area and prioritising the efficient use of previously developed land. The application site is currently underutilised, comprising predominantly hardstanding, parking and low-intensity uses that make a limited contribution to the vitality or function of the town centre. The proposal represents a clear enhancement over the existing situation, bringing the site into active use through the introduction of employment, cultural and community functions.
- 6.4 As such, the proposed development aligns with the NPPF's objective of making effective use of land and the spatial strategy set out in Policy SS1, which seeks to optimise previously developed land within the built-up area. The scheme will also contribute positively to the character and activity of the area, in accordance with Policy DM6, by introducing an active and animated use where there is currently limited engagement with the public realm.
- 6.5 Policy SS2 seeks to ensure the delivery of employment and commercial floorspace across the Borough. Whilst the site is not specifically allocated, the proposal nonetheless

contributes towards these strategic objectives through the provision of new employment and commercial uses within a highly sustainable location. The introduction of flexible offices, creative studios and supporting leisure uses will contribute to the Borough's overall supply of employment-generating floorspace and support the diversification of the local economy. Additionally, the modular nature allows phased delivery and adaptation over time.

- 6.6 The site lies within the defined town centre, where Policy SS3 directs a wide range of main town centre uses, including commercial, leisure and community uses. The proposed mixed-use community hub, comprising workspace, café and wellbeing uses, is entirely consistent with the role and function of the town centre and supports its vitality and viability.
- 6.7 Policy DM13 supports main town centre uses in appropriate locations and seeks to maintain and enhance the diversity of uses within centres. The proposal introduces a flexible mix of uses that will increase activity and footfall within the area. This is supported by evidence of strong local demand, with previous pilot events attracting over 2,000 visitors and

demonstrating a clear appetite for this type of community-led space.

- 6.8 Policy DM10 supports proposals that contribute towards economic growth, job creation and skills development. The scheme will provide flexible workspace, creative studios and small business opportunities, directly supporting local employment and entrepreneurship. It is anticipated to deliver over 30 local jobs and in excess of 40 affordable workspaces, addressing a recognised gap in the town centre's provision for creative and hybrid workers.
- 6.9 Policy DM11 seeks to protect and enhance employment sites, supporting their continued use and diversification. The proposal represents an effective use of previously developed land, introducing a range of employment-generating uses within a coherent and flexible layout, thereby enhancing the economic function of the site.
- 6.10 Policy DM8 supports development that contributes towards sustainable communities, including the provision of community facilities and spaces that promote health and wellbeing. The inclusion of a café, fitness, and community-

focused spaces, alongside informal gathering areas, will provide social and wellbeing benefits, contributing positively to the local community.

- 6.11 Policy DM9 requires development to be supported by appropriate infrastructure. The proposal utilises an existing urban site with established access and services, and incorporates all necessary infrastructure to support its operation, including servicing, circulation and utilities, without placing undue pressure on the wider network.
- 6.12 The proposal makes efficient use of a previously developed site within a highly accessible location, delivering a flexible and contemporary form of development that responds to modern economic and community needs. The scale and nature of the proposal are appropriate to its town centre context and would not give rise to any unacceptable impacts.
- 6.13 The proposal also delivers wider economic and social benefits in line with Policy DM10 through its operational model. As set out in the submitted business plan, the development will prioritise local procurement, with a target of at least 60% of goods and services sourced from local sources. In addition,

the operator has committed to paying the Real Living Wage and to providing affordable workspace at below market rates, ensuring accessibility for start-ups, creatives and small businesses. These measures will help to retain economic activity locally, support business growth and contribute to a more inclusive and resilient local economy.

- 6.14 Additionally, Worthing Borough Council has ambitions to become the UK Town of Culture 2028 designation. The proposal is a direct and permanent response to that ambition, it will provide dedicated cultural infrastructure that places makers, creatives and the community at the centre of the town's identity. A container village of working studios, collaborative offices and social spaces is precisely the kind of bold, community-led cultural statement that defines a genuine Town of Culture.
- 6.15 Overall, the proposal is a highly suitable and beneficial use for the local community, it accords with Policies SP1, SS1, SS2, SS3, DM8, DM9, DM10, DM11 and DM13 of the Worthing Local Plan align with the NPPF. There are no material considerations that would indicate otherwise and the

development therefore benefits from the presumption in favour of sustainable development.

Sustainable Development

- 6.16 Having regard to the three key objectives of sustainable development set out at paragraph 8 of the NPPF, the proposed development complies as follows:

a) an economic objective – the proposal will deliver clear economic benefits through the creation of flexible workspace, creative studios and small business units within the town centre. The scheme is expected to generate new employment opportunities and support local entrepreneurship, alongside increased footfall which will benefit surrounding businesses. The construction phase will also provide short-term support to the local building industry and associated trades. The proposal complies with the economic objective of sustainable development.

b) a social objective – the proposal will provide a community-focused hub incorporating café, leisure and wellbeing uses, alongside flexible spaces for collaboration and social interaction. The site is located within the town centre, with

excellent access to services, public transport and employment opportunities, ensuring it is accessible to a wide range of users. The scheme will create social cohesion, support community activity and provide accessible facilities that contribute positively to health and wellbeing. The proposal complies with the social objective of sustainable development.

c) an environmental objective – the proposal represents the efficient use of a previously developed urban site within a highly sustainable location, reducing the need to travel and therefore supports patterns of sustainable movement. The modular container approach minimises construction waste and enables a flexible and adaptable form of development. The scheme will not result in any unacceptable environmental or visual impacts and will integrate appropriately within the surrounding townscape. The proposal complies with the environmental objective of sustainable development.

7. LAYOUT, DESIGN AND APPEARANCE

- 7.1 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Developments should be visually attractive and sympathetic to the local character of the surrounding area and should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (paragraphs 131 and 135).
- 7.2 Policies DM5 and DM6 of the Worthing Local Plan, together with Chapter 12 of the NPPF, require development to be of high quality design that responds positively to local character and creates attractive and functional places,
- 7.3 The proposed development has been carefully designed to deliver a contemporary and distinctive form of development that responds appropriately to its town centre context. The layout adopts a clear placemaking strategy, with containers arranged in a U-shaped configuration around an activated public courtyard. It provides informal gathering space, outdoor

dining, events and community programming. This approach ensures the site functions as a legible and usable space, contributing positively to the character and vitality of the area in accordance with Policy DM6.

- 7.4 The proposal also incorporates active frontages, with street-facing containers forming an active retail/workspace frontage, ensuring strong visual and functional integration with the surrounding town centre environment. This will enhance activity, footfall and natural surveillance, consistent with the objectives of Policy DM5 and also Policy DM13 as discussed above.
- 7.5 In terms of scale and massing, the development has been designed to sit comfortably within its surroundings. The use of modular containers ensures a restrained and appropriate form of development, with the largely single-storey containers maintaining a localised streetscape. As such, the proposal would not appear overly dominant or out of character within the surrounding area.
- 7.6 The material palette and overall design approach further reinforce this, combining contemporary modular construction

with references to local character and the use of high-quality materials. In addition, the development adopts a sustainable and low-impact approach, with all structures being non-permanent and fully removable, complete reversibility at end of use, ensuring minimal long-term impact on the site.

- 7.7 The proposal will provide a high quality environment for users, with well-designed internal spaces and a strong emphasis on outdoor amenity through the central courtyard and associated landscaping. This will create an attractive and functional environment for workers, visitors and the wider community, consistent with the objectives of Policy DM6.
- 7.8 Overall, the proposal represents a high quality, well-considered form of development that responds positively to its context, enhances the character and function of the town centre, and delivers a flexible and attractive environment for a range of uses. The development therefore complies with Policies DM5 and DM6 of the Worthing Local Plan and the design objectives of the NPPF.

Impact Upon Residential Amenity

- 7.9 Paragraph 135 of the NPPF states that planning should ensure a good quality of amenity for existing and future uses. Policy DM5 of the Worthing Local Plan requires that development is of a high quality design and does not result in unacceptable impacts on the occupiers of adjacent properties, including in respect of privacy, outlook, daylight/sunlight, noise and general disturbance.
- 7.10 The proposed development has been carefully designed to ensure that it integrates appropriately within its surroundings without giving rise to adverse amenity impacts, in full accordance with Policy DM5(a)(viii). The scale of the development is modest, comprising predominantly single-storey modular containers, which maintain a low profile and avoid any undue sense of enclosure or overbearing impact on neighbouring properties.
- 7.11 The layout has been arranged to focus activity inward, with containers positioned around a central courtyard. As set out within the submitted plans, this creates an activated public courtyard providing informal gathering space, outdoor dining,

events and community programming. This internalised arrangement ensures that activity is contained within the site, limiting outward impacts on surrounding uses.

7.12 In addition, the proposed boundary treatments have been carefully considered, the scheme includes a new sliding entrance gate and fencing is proposed above the existing northern boundary wall to achieve a height of approximately 2m. These measures provide appropriate screening and security, helping to minimise potential overlooking, noise and disturbance to adjacent occupiers. The proposal therefore ensures a high standard of amenity in accordance with Policy DM5.

7.13 In terms of privacy, the positioning of entrances, glazing and active frontages has been carefully considered to avoid direct overlooking of neighbouring properties. Given the single-storey nature of the development and the town centre context, there would be no unacceptable loss of privacy or outlook.

7.14 With regard to noise and disturbance, the proposed uses, including flexible workspace, studios, café, gym and wellness uses, are typical of a town centre environment and are

compatible with surrounding uses. While some activity is anticipated, including within the courtyard, this reflects the character and expectations of a central location. The proposed pattern of use, which is primarily daytime with some limited evening activity, ensures that impacts remain within acceptable levels.

7.15 The proposal also benefits from its location within the defined town centre, where a higher baseline level of activity and ambient noise is already present. As such, the development would not introduce a form or intensity of use that would result in significant adverse impacts on neighbouring amenity.

7.16 Overall, the scale, layout and nature of the development ensure that there would be no unacceptable impacts on the amenity of neighbouring occupiers. The proposal therefore fully complies with the requirements of Policy DM5 of the Worthing Local Plan.

8. NATURAL ENVIRONMENT

Sustainability

- 8.1 Paragraph 161 requires the planning system to support the transition to a low carbon future and to taking into account flood risk. New development should be planned in ways which avoid increased vulnerability to the range of impacts arising from climate change (paragraph 164).
- 8.2 Policy SP2 of the Worthing Local Plan requires a comprehensive approach to climate change, including reducing energy use, supporting renewable energy, promoting sustainable transport, incorporating green infrastructure and ensuring development is resilient to climate change. Policy DM16 sets out detailed requirements for sustainable design, including minimising energy consumption, reducing carbon emissions, addressing overheating and minimising waste. Policy DM17 focuses on energy, requiring development to incorporate renewable and low carbon energy generation and apply the energy hierarchy.
- 8.3 In accordance with Policy DM16, the scheme adopts a low-impact construction methodology through the use of repurposed shipping containers. As confirmed within the submitted business plan, all containers are reused from end-of-service logistics use, diverting 340+ tonnes of steel from waste. This significantly reduces embodied carbon and aligns directly with the requirement to follow the waste hierarchy and minimise resource consumption.
- 8.4 The development also avoids permanent foundations, with containers positioned on surface-level supports. This ensures full reversibility of the development and avoids the need for concrete slab construction, further reducing environmental impact and supporting a circular design approach consistent with Policy DM16.
- 8.5 In operational terms, Policy DM16 and DM17 require development to minimise energy demand and incorporate low carbon energy solutions. The proposal includes high levels of insulation (including PIR insulation boards), energy-efficient LED lighting and smart energy systems, ensuring reduced operational energy consumption. In addition, the flat-roofed modular arrangement is designed to accommodate solar

photovoltaic panels, with the business plan confirming the potential to achieve “30%+ on-site renewable generation”. This significantly exceeds the 10% renewable energy expectation set out in Policy DM17(a).

8.6 Policy DM17 also requires that development follows the energy hierarchy and selects the lowest carbon heating and cooling solution feasible. The scheme incorporates passive design principles, including natural ventilation, external circulation and open courtyard space, reducing reliance on mechanical cooling systems.

8.7 In terms of water management, Policy DM17 requires development to incorporate sustainable drainage measures. The proposal includes permeable surfacing and a SuDS-compliant drainage strategy, with the business plan confirming no increase in impermeable area and a target of reducing surface water runoff. Rainwater harvesting is also incorporated to support irrigation.

8.8 The proposal also makes a contribution to biodiversity and green infrastructure in line with Policies SP2 and DM16. The inclusion of green walls, planting and a rain garden supports

urban greening and delivers a biodiversity net gain, with the business plan identifying a target of at least 10% net gain.

8.9 Finally, the site’s town centre location promotes sustainable patterns of movement, with the business plan confirming a largely car-free development policy supported by cycle parking and facilities. This aligns directly with Policy SP2’s requirement to prioritise active travel and reduce reliance on private vehicles.

8.10 Overall, the proposal adopts a comprehensive and integrated approach to sustainability, addressing embodied carbon, operational energy use, renewable energy generation, climate resilience and resource efficiency. The development therefore fully accords with the requirements of Policies SP2, DM16 and DM17 of the Worthing Local Plan.

Biodiversity

8.11 Policy DM18 sets out all development should ensure the protection, conservation, and enhancement of biodiversity. If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts or through design), then such harm should be adequately mitigated.

Where it cannot be adequately mitigated then as a last resort such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused.

8.12 The proposal has been designed to avoid harm in the first instance through its low-impact, previously developed site and the use of non-permanent, modular structures that do not require extensive ground disturbance. The scheme incorporates a range of biodiversity enhancements, including green walls, raised planters, wildflower planting and a rain garden, with a target of achieving at least a 10% biodiversity net gain.

8.13 As such, these measures ensure that the proposal not only avoids harm but delivers a net environmental benefit. Therefore, there is no requirement for mitigation or compensation, and the proposal fully complies with the mitigation hierarchy set out in Policy DM18.

Flood Risk, Drainage and Water Quality

8.14 Policy DM20 requires development to be directed away from areas of highest flood risk and to incorporate Sustainable

Drainage Systems (SuDS) to ensure that development does not increase flood risk elsewhere and, where possible, reduces it. It also requires surface water to be managed through natural drainage solutions, with runoff controlled and integrated with green infrastructure. Policy DM21 requires development to protect and enhance water quality, avoid pollution, and incorporate sustainable water management measures, including appropriate drainage and infrastructure.

8.15 A Drainage Statement and Scheme Surface Water Strategy has been prepared by CGS Civils in support of this planning application. The Statement confirms the site is currently a fully impermeable car park and the proposed development does not increase the extent of impermeable area. This ensures that there is no increase in surface water runoff rates or flood risk on site or downstream.

8.16 The proposals introduce bio-retention planters integrated within the container development which intercept, attenuate and treat surface water runoff. Rainwater will be captured via gutters and downpipes and directed into these features before discharging to ground, replicating existing drainage behaviour while improving performance. These systems are designed to

slow discharge rates and reduce the overall volume of water entering the existing drainage network, thereby providing betterment over the existing situation and reducing flood risk overall.

8.17 The layout also incorporates green infrastructure and planting within the courtyard environment, which further contributes to surface water management, biodiversity and amenity benefits. The use of bio-retention planters and soft landscaping ensures that runoff is managed on site through natural processes, fully aligning with the objectives of Policy DM20.

8.18 The proposal also aligns with Policy DM21 by incorporating measures to protect and enhance water quality. The drainage strategy has been designed in accordance with the SuDS Manual and demonstrates that the proposed bio-retention systems provide effective pollution mitigation, ensuring that surface water runoff is appropriately filtered and treated prior to discharge. This ensures there are no adverse impacts on the receiving water environment.

8.19 Foul water will be connected to the existing foul sewer network on site, subject to confirmation via CCTV survey, ensuring an appropriate and sustainable drainage solution is achieved. Existing drainage infrastructure, including channel drains, will be retained and remain accessible for maintenance, ensuring the continued effective operation of the system.

8.20 Overall, the proposal adopts a sustainable and integrated approach to drainage and water management. It ensures that flood risk is not increased, delivers betterment over the existing site, protects water quality and provides wider environmental benefits through the incorporation of SuDS and green infrastructure. The development therefore fully accords with Policies DM20 and DM21 of the Worthing Local Plan.

9. HIGHWAYS

9.1 The NPPF sets out at paragraph 116 that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

9.2 Policy DM15 seeks to promote a rebalancing of transport in favour of sustainable modes by ensuring development is located in accessible locations, prioritises walking, cycling and public transport, minimises reliance on private cars, and provides appropriate infrastructure such as cycle parking, electric vehicle provision and safe access arrangements.

9.3 A Transport Statement has been prepared by GTA Civils and Transport has been submitted in support of this planning application. This Statement confirms the site is highly accessible, located within Worthing town centre, approximately 700m from Worthing railway station and within 310m of bus stops, with a wide range of services within

walking and cycling distance. The development therefore minimises reliance on the private car.

9.4 The proposal utilises the existing access from Upper High Street, with appropriate visibility splays (2.4m x 43m) achievable in accordance with Manual for Streets. Accident data confirms no recorded incidents at or near the access in the last five years, and no highway safety concerns arise.

9.5 The scheme promotes sustainable travel through the provision of secure cycle parking (20no. spaces) and its central location. It also provides 17no. parking spaces, plus 1no. accessible space, which is considered appropriate given the sustainable location and mixed-use nature of the development.

9.6 Trip generation associated with the proposal is negligible, with only around 2 additional two-way vehicle movements in peak periods. This is offset by the removal of the existing NCP car park, resulting in a reduction in overall vehicle activity.

9.7 Overall, the Transport Statement concludes that the development will not result in any material impact on highway

safety or the operation of the local road network. The proposal therefore complies with Policy DM15 and the NPPF.

10. CONCLUSION

- 10.1 This Statement supports an application for the installation of modular shipping containers to form a mixed-use community and employment hub at 24 Upper High Street, Worthing. The proposal will deliver a flexible and vibrant development comprising affordable workspace, creative studios, and community-focused uses within a highly sustainable town centre location.
- 10.2 The proposal accords with both national and local planning policy, including the spatial strategy set out in Policy SS1 and the town centre focus of Policy SS3. It represents an efficient and effective use of previously developed land, bringing an underutilised site into active and productive use. The development will contribute positively to the vitality and viability of the town centre, supporting Worthing's wider regeneration objectives and its ambition to become a UK Town of Culture.
- 10.3 The scheme delivers clear economic and social benefits in accordance with Policies DM10 and DM8, including the

creation of local jobs, provision of affordable workspace and support for small businesses, creatives and the wider community. The operational model further reinforces these benefits through commitments to local procurement, affordable rents and inclusive access, helping to support a resilient and locally rooted economy.

- 10.4 In design terms, the proposal is of a high quality and responds positively to its context, in accordance with Policy DM5. The modular form, appropriate scale and carefully considered layout, including active courtyard spaces and landscaping, ensure that the development integrates successfully within the surrounding area. The proposal will not give rise to any unacceptable impacts in respect of neighbouring amenity, highway safety, parking or environmental considerations.
- 10.5 The development also adopts a sustainable approach in accordance with Policies SP2, DM16 and DM17, including the reuse of materials, incorporation of renewable energy, and a SuDS-led drainage strategy. The scheme is inherently low-impact and reversible, further reducing its long-term environmental effects.

10.6 Overall, the proposal represents sustainable development when assessed against the economic, social and environmental objectives of the NPPF. The development accords with the Development Plan when read as a whole, and planning permission should therefore be granted.