

PLANNING POLICY COMMENTS

Application Number	AWDM/1329/25
Location	Car Park Adjacent Sandell House Railway Approach Worthing
Proposal	Erection of a five to seven storey building with 29 self contained residential units (Use Class C3) including undercroft parking and cycle store linked to listed building
DM Officer	Louise Prew
Sent to Policy	26.11.2025
Policy Officer	Jennifer Ryan
Returned to DM	12.12.2025

General Comments / Principle of Development

Worthing Borough Council formally adopted the Worthing Local Plan 2020-2036 (WLP) at Full Council on 28th March 2023. The Local Plan forms part of the statutory development plan, which sets the strategic development and land-use priorities for Worthing (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within that area will be made. The Local Plan supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).

Key policies of WLP

Policy SS1 - Spatial Strategy

Policy SS1 of the Adopted Local plan requires high quality development that provides for the needs of local communities. It states that development will be permitted within the built up area boundary, subject to compliance with other policies in the Local Plan. Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area. It is considered that the proposal is consistent with these requirements.

Policy SS1 sets out the Housing supply over the period 2020-2036 and gives a total figure of 3672 (an annual target of 230 dwellings per annum).

Paragraph 78 of the NPPF (2024) states that ' Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land;
- or b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply;
- or c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework , and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

The most recent [5 Year Housing Land Supply](#) (5YR HLS) position for Worthing as at 01/04/2024 demonstrates a 6.3 years supply applying a 20% buffer as at that time Worthing had failed the then current Housing Delivery Test (HDT) (2022 published December 2023).

The most recent HDT 2023 (published 2024) Worthing scored 107% and therefore faces no consequences from the HDT.

Having a 5YR HLS position and having passed the HDT with no consequences means that for Worthing Paragraph 11 c) of the NPPF applies which states :

‘For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; ‘

Policy DM1 - Housing Mix

Policy DM1 of the Local Plan requires that, in order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up-to-date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site.

An updated [Strategic Housing Market Assessment \(July 2025\)](#) identifies a need for all different sized of homes in the market and social housing sectors for Worthing. Paragraph 8.42 of the SHMA report indicates a particular need for 2 and 3 bedroom accommodation, with varying proportions of 1 and 4+ bedroom homes. For market housing, the suggested size mix of housing by tenure for 1 bedroom is 5% and for 2 bedrooms is 40% as identified in Table 8.25.

The 29 dwellings will consist of 18 x 1 bedroom and 11 x 2 bedrooms and thus provide a suitable mix considered appropriate in this location. As such there is no significant conflict with policy DM1 of the Local Plan, in this respect.

Policy DM2 - Density

The application is proposing to accommodate 29 units which would result in a housing density of circa 322 dwellings per hectare (dph). This will comply with criterion a) ii) which

states that higher densities, in excess of 100 dwellings per hectare should be achieved in most mixed use developments, flatted developments and developments located in the town centre and in areas close to public transport interchanges and services. The NPPF encourages high density and taller buildings to be located in close proximity to public transport interchanges.

The dwellings will be expected to meet as a minimum the nationally described space standards for internal floor areas and storage space. These standards will apply to all open market dwellings and affordable housing. The applicant will be expected to have regard to the Council's local guidance for external space which can be found here:
<https://www.adur-worthing.gov.uk/media/99159.smxx.pdf>

The Council's local standards will continue to apply for external space as this is not covered with the national standards and it is important that occupiers have access to some private or at least, semi-private outdoor space. In the case of flats, accommodation for families should usually be provided on the ground floor so that access to a garden can be provided. For other flats, balconies may take the place of a garden but easily accessible communal areas will often be required. It is noted from the submitted Planning Statement that all apartments will benefit from balconies with a minimum of 5sqm and larger terraces too for the recessed top floor penthouse apartments.

Policy DM3 - Affordable Housing

Policy DM3 of the Local Plan states that new residential development on previously developed land involving the development of 10 or more flats will lead to a requirement for 20% affordable housing.

The proposal will provide 6 units of affordable housing with a mix of four 1-bed units and two 2-bed units. This provision will meet the 20% affordable housing requirement.

The proposal will provide one affordable apartment that will be M4(3) wheelchair accessible which represents 3% of the affordable provision in accordance with Policy DM3 (d).

Policy DM7 - Open Space, Recreation & Leisure

New residential development will be required to provide on-site open space in accordance with the Council's adopted standards as set out in Tables 1, 2 & 3 (applying occupancy levels based on the size of dwellings proposed) of Policy DM7.

According to Table 3, the proposed development threshold of 29 residential units triggers amenity green space to be provided on-site with an off-site contribution to be sought for allotments, parks and recreation, play space (children's space), play space (youth) and accessible natural green space. Given that the site is a brownfield site, in the event that there is no capacity for provision of on-site amenity green space, a contribution for off-site provision will be sought instead.

Contributions towards the provision or improvement of off-site open space are set out in the Open Space Study (2019) and calculated using the capital cost of provision using the assumption of an average household size of 2.2 persons/household. For information, the annual commuted sum and total commuted sum is a maintenance contribution that applies to on-site provision; this will not apply if an off-site contribution is sought.

Policy DM11 - Protecting and Enhancing Employment Sites

The site lies within 'Railway Approach', a key office location as defined by Policy DM11.

The site has only been tested for commercial viability of a notional five/six storey office scheme. There doesn't seem to be any consideration of small scale flexible commercial uses, particularly on the ground floor as part of a mixed use scheme. The site could offer an excellent location for small scale offices or even co-working space given its proximity to the railway station. As such it would be helpful if the applicant could set out why they have not considered a mixed use scheme in this highly sustainable location.

Policy DM20 - Flood Risk & Sustainable Drainage

In terms of flood risk, the site is not within a flood zone for tidal or fluvial flooding and is not at risk of surface water flooding now or in the future but is adjacent to surface water flow path. It is noted that the submitted Drainage Strategy has considered the new national guidance and the drainage hierarchy.

Policy DM24 - The Historic Environment

The site does not fall within a Conservation Area however it is immediately adjacent to Sandell House, the original Worthing Railway Station which is Grade II Listed. Also within the vicinity is the Railway Hotel, also Grade II Listed. The application will need to comply with the requirements of Policy DM24.