

2nd September 2026

Giles Holbrook

Planning and Building Control
Worthing Borough Council
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

Dear Giles

**Land Between Sword Street and Martlets Way, Worthing
LPA Ref. AWDM/0628/26 – Observational Comments**

On behalf of our client, Industrial Property Investment Fund (IPIF) which is managed by Legal & General, I write to provide observational comments on the live planning application that has been submitted at Land Between Sword Street and Martlets Way, Worthing (LPA Ref: AWDM/0628/26).

Our client owns various land and premises to the immediate west and northwest of the application site. This includes Martlets Trading Estate, and a large proportion of Martlets Way (with the eastern half of Martlets Way understood to be public highway). The live application proposes access via Martlets Way and through Martlets Trading Estate for the commercial unit only (which is to be located to the immediate east of Martlets Trading Estate).



Figure 1: IPIF Ownership (green and purple shading)

Martlets Trading Estate is an operational estate comprising a single-storey terrace of industrial units (Use Classes E(g), B2, B8 and Sui Generis). Car parking and servicing is located in front of the terrace off Martlets Way.

Having reviewed the live planning application, we would like to raise the following initial comments and queries:

- **Missing Plans** – we are struggling to locate the floorplans, elevations, and Street Scene D-D relating to the proposed commercial unit. Please can these be shared with us.
- **Use Classes** – we note that the submitted Application Form just refers to Use Class Egiii in the context of the proposed commercial unit, but other submitted documents refer to flexible Class B2 / B8 / Egiii. Please can the proposed use class for the commercial unit be clarified.
- **Construction Traffic** – we are struggling to locate any information in relation to construction logistics. We would strongly object to any construction traffic using Martlets Way. Please can the proposed access arrangements for construction be confirmed.
- **Pedestrian Access** – in terms of accessing the proposed development by foot, while the western section of Martlets Way benefits from a footway on both sides of Martlets Way, the footway stops at the entrance of Martlets Trading Estate. From this point on there is a shared surface arrangement with perpendicular parking on the northern side of Martlets Way and parallel parking on the southern side. The interaction between pedestrians and vehicles along this stretch has been successfully managed to date. However, with the intensification of Martlets Way because of the proposed commercial unit, we have concerns around increased pedestrian usage of the shared surface which the live application does not appear to have considered.
- **Car Parking** – any under provision of car parking associated with the proposed commercial unit could lead to an overspill of car parking onto Martlets Trading Estate, Martlets Way, and the wider industrial area to its detriment. We would respectfully request that the Council fully interrogate the proposed car parking provision, and if minded to approve the live application, we would respectfully request that a planning condition be attached to the permission requiring the submission of a Car Parking Management Plan.
- **Drainage** – we note that the proposed drainage strategy includes the installation of a new surface water sewer in Martlets Way. Based on information submitted as part of the live application, we are struggling to understand how the applicant would deliver this whilst maintaining unfettered operation of Martlets Trading Estate.

- **s106 Legal Agreement** – with reference to the submitted Location Plan (Drawing No. LP-01 Rev A) and Certificate C of the submitted Application Form, we note that the application red line includes part of our client's land (Martlets Way). As such, we believe that our client should be a signatory to any s106 Legal Agreement attached to any planning permission (should the application be approved). We welcome engagement from the applicant and the Council on this at the appropriate time.
- **2023 planning application** – we note that the 2023 planning application (LPA Ref. AWDM/0131/23) is still live. We would be grateful of confirmation on what is happening with this application.

I trust that the above is of assistance in the consideration of the live planning application at Land Between Sword Street and Martlets Way. We would be grateful to be kept up to date on the application and would welcome the opportunity to review and comment on any additional information provided by the applicant as identified above.

Sincerely,

Patrick Dixon
Associate