

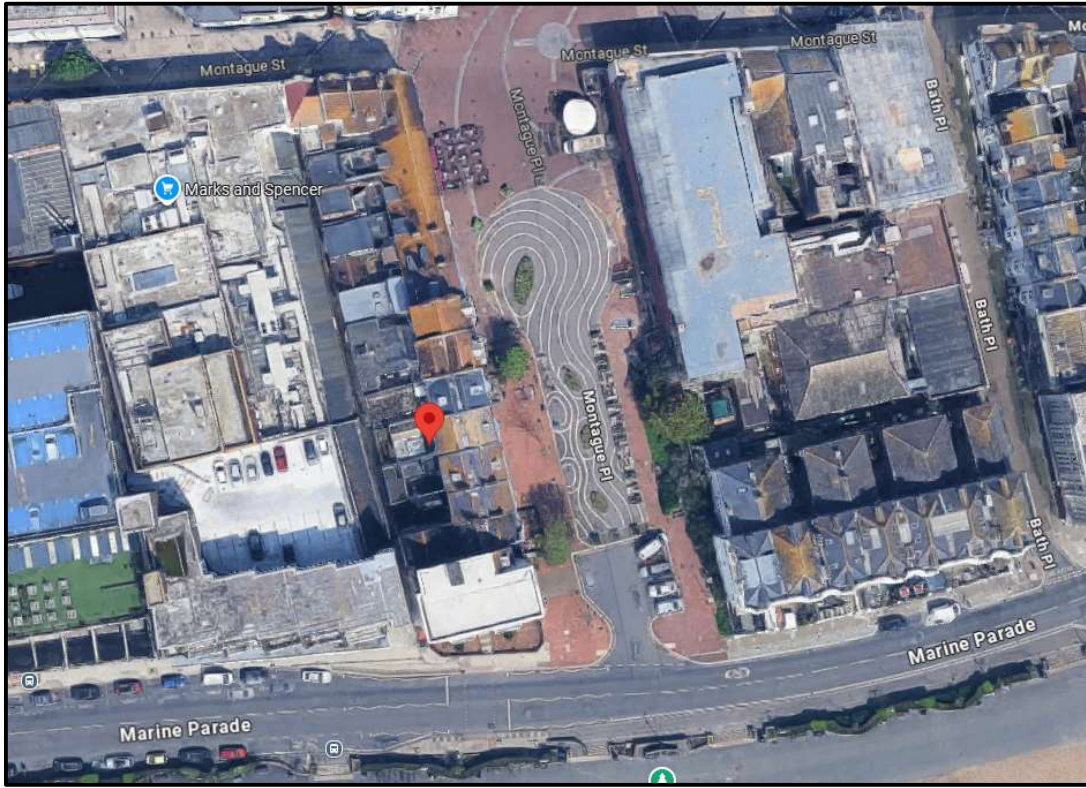


LEWIS & CO

**DESIGN & ACCESS AND
PLANNING STATEMENT**

11 MONTAGUE PLACE, WORTHING, BN11 3BG

ON BEHALF OF: CONNAUGHT HOUSE (MARINE
PARADE) LTD



Client: CONNAUGHT HOUSE (MARINE PARADE) LTD

Site Location: 11 MONTAGUE PLACE, WORTHING, BN11 3BG

Job History:

Version	Date	Author	Checked	Notes
V1	19/02/2025	PJ	LC	
Final	28/04/2025	ZD	LC	



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1.0 INTRODUCTION AND SUMMARY

1.1 This Statement has been prepared on behalf of Connaught House (Marine Parade) Ltd (the applicants) and relates to an application for planning permission and listed building consent at 11 Montague Place, Worthing, BN11 3BG.

1.2 Permission and consent are sought from Worthing Borough Council for the *conversion of the E class premises over five floors to E class at lower ground and part ground floor with 4no one-bedroom flats above.*

1.3 This statement should be read in conjunction with the following documents and drawings that comprise the applications for planning permission and listed building consent:

- Application Form
- Heritage Statement
- CIL Form 1
- Marketing Report (Tom Graves Property Agency)
- Marketing Confirmation (Eightfold Marketing)
- Email of intention to occupy (Pretty Please Health and Beauty)
- Flood Risk Assessment – 11 Montague Place – April 2025
- A01: Site location plan and block plan (drawings provided by Jonida Murataj)
- A02: Existing and proposed lower ground floor plan
- A03: Existing and proposed ground floor plan
- A04B: Existing and proposed first floor plan
- A05: Existing and proposed second floor plan
- A06: Existing and proposed third floor plan
- A07: Existing and proposed fourth floor plan
- A08B: Existing and proposed east elevation
- A09: Existing and proposed west elevation
- A10: Existing and proposed north elevation
- A11: Existing and proposed south elevation
- A12: Existing section A
- A13: Existing section B
- A14: Proposed section A
- A15: Proposed section B
- A16B: Existing shopfront window
- A17B: Proposed external door



- 1.4 This Statement addresses the proposed development, site and surrounding area and compliance with relevant local and national planning policies and guidance. The planning case is that a viable and lettable town centre commercial unit will be retained with the four new dwellings making a positive contribution to local housing supply and the vitality of Worthing. These benefits are achieved without any harm being caused to the significance of the Grade II listed building and South Street Conservation Area.



2.0 APPLICATION SITE & SURROUNDING AREA

- 2.1. 11 Montague Place is a mid-terrace, four storey building constructed in the early 19th century. It is finished in white painted stucco render with a curved shopfront at ground floor and curved bow windows to the floors above. The building is in the secondary shopping frontage of the defined Worthing town centre and South Street conservation area.
- 2.2. 11 Montague Place is Grade II listed (list entry 1250442) as part of a group listing with its southerly neighbours no12, 13 and 14 Montague Place. The heritage value of the group is understood to be aesthetic. The elegant bow frontages of the group contribute to the visual grandeur of the town centre. The heritage value and significance of the building is assessed in the accompanying Heritage Statement.

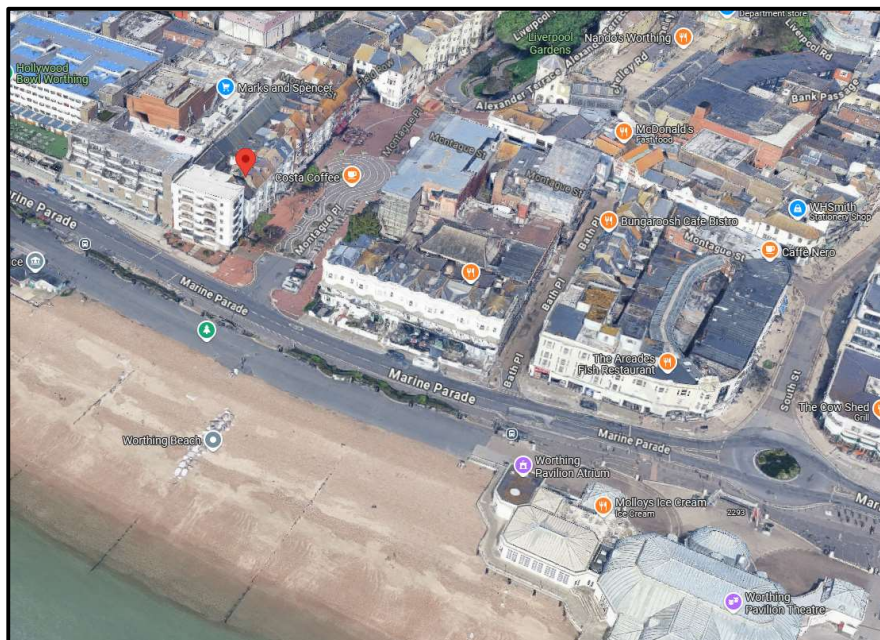


11 Montague Place, Worthing



2.3 The site has been vacant since early 2024. It had been occupied for many years as a hair and beauty salon with ancillary training rooms to the upper floors. The full site has been unsuccessfully marketed for re-let as an E class premises for more than 12 months.

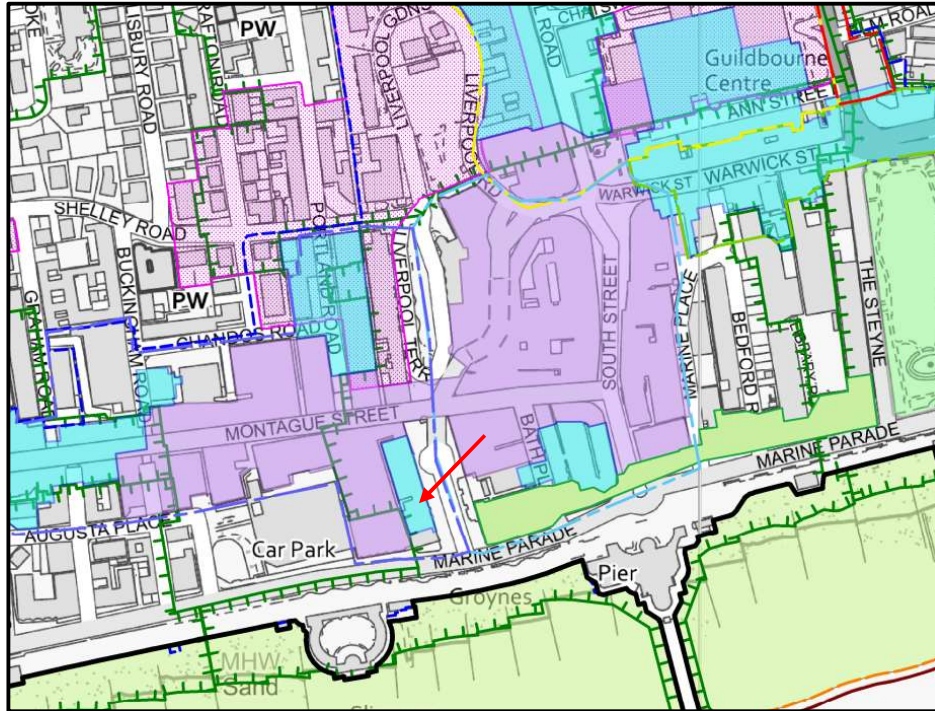
2.4 Montague Place forms part of the Worthing town centre and is close to the seafront and Worthing Pier. As expected of a town centre location, the site is surrounded by a lively blend of town centres uses, including shops, restaurants and leisure venues. There are many residential dwellings in the vicinity, often to the upper floors of mixed-use buildings.



Aerial image of site and surrounding area: Google Earth

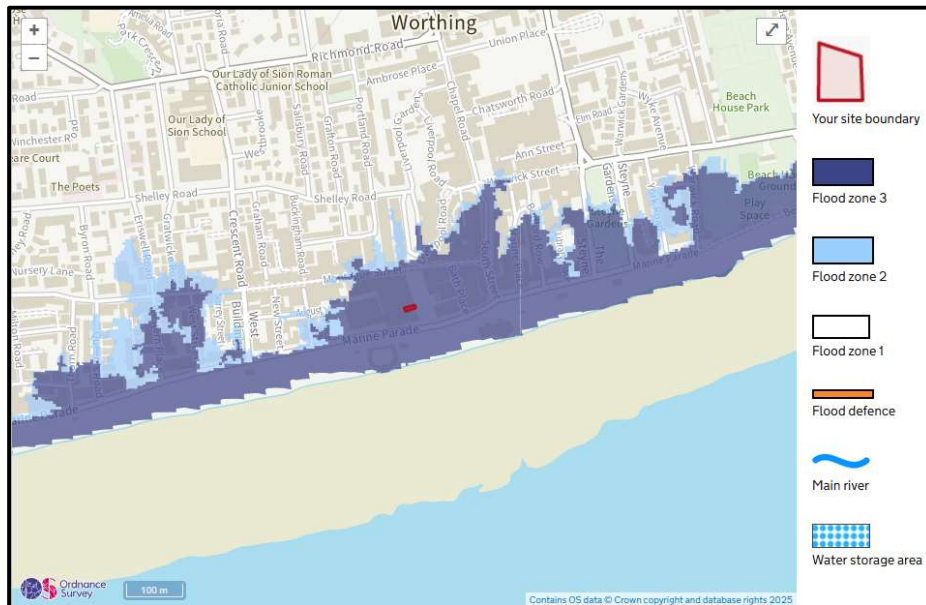
2.5 The Worthing Local 2023 Town Centre inset map confirms the site is:

- Within the Built-Up Area Boundary (thick black line)
- Within the defined Worthing Town Centre (blue dashed line)
- Within the South Street Conservation Area (Green dashed line)
- Part of the secondary shopping frontages (light blue shading)
- Within the Montague Street town centre character area (purple dashed line)



Extract Worthing Local Plan 2023 Town Centre inset Map

2.6 The seafront streets of Worthing are generally in Flood Zone 2 or 3, where there is a higher risk of flooding from rivers or the sea.



Extract Flood Map for Planning



3.0 PLANNING HISTORY

- 3.1 The Council's online planning register lists the following planning applications at 11 Montague Place.
- 3.2 *AWDM/1449/21 - Listed building consent for replacement shopfront.* Listed building consent was granted on 17th November 2021.
- 3.3 *AWDM/1445/21 - Replacement shop front.* The associated planning application was also approved on 17th November 2021.
- 3.4 The historic timber shopfront had suffered from rot and needed to be replaced. The approved replacement for like for like.



4.0 DESIGN & ACCESS CONSIDERATIONS

AMOUNT

- 4.1 The proposed building will comprise an E class (commercial, business and service) unit of 90.7m² and 4no one-bedroom flats (C3). The flats will be 72m²; 45m²; 45m²; and 88m² respectively.

USE

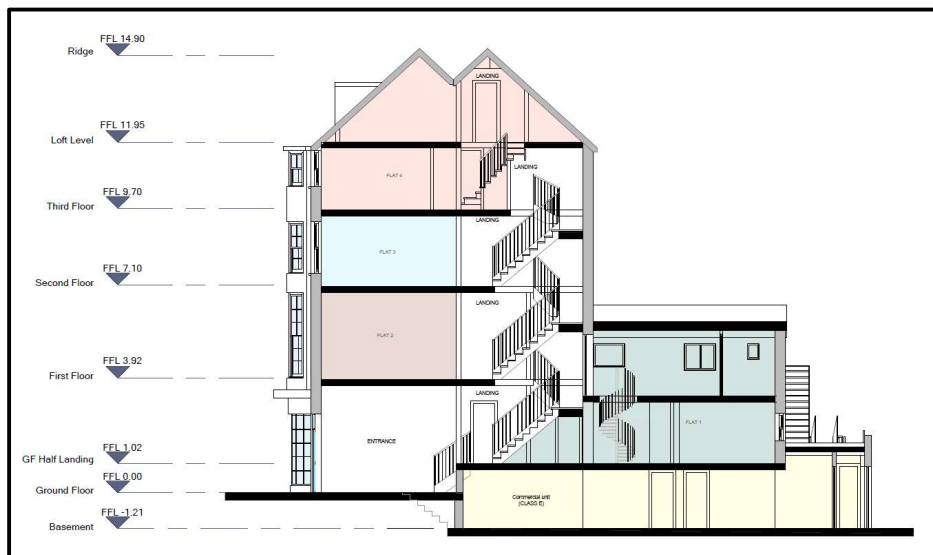
- 4.2 The existing use of 11 Montague Place is E class (commercial, business and service). The most recent occupier was a hairdresser with ancillary training rooms.
- 4.3 The proposed use of the lower ground floor and the front of the ground floor is E class (commercial, business and service). The proposed use of the rear of the ground floor, first, second, third and fourth floors is C3 (residential).

LAYOUT

- 4.4 The building will continue to be accessed from the street at Montague Place. The retained commercial unit will be accessed via the existing front door - central within the curved shop front. The flats will be accessed via a new door to the right-hand side of the frontage, which will replace an existing floor to ceiling window.
- 4.5 The lower ground floor will comprise E class space, with the existing rooms and access to rear courtyard retained.
- 4.6 The ground floor will comprise E class space to the front with a one-bedroom flat (Flat 1) to the rear.
- 4.7 The first floor will comprise a one-bedroom flat (Flat 2).
- 4.8 The second floor will comprise a one-bedroom flat (Flat 3).



- 4.9 The third and fourth floors will comprise a one-bedroom flat (flat 4) with kitchen, living room and bedroom below a large bathroom and storage room.



Proposed Section A



Proposed lower ground and ground floor plans

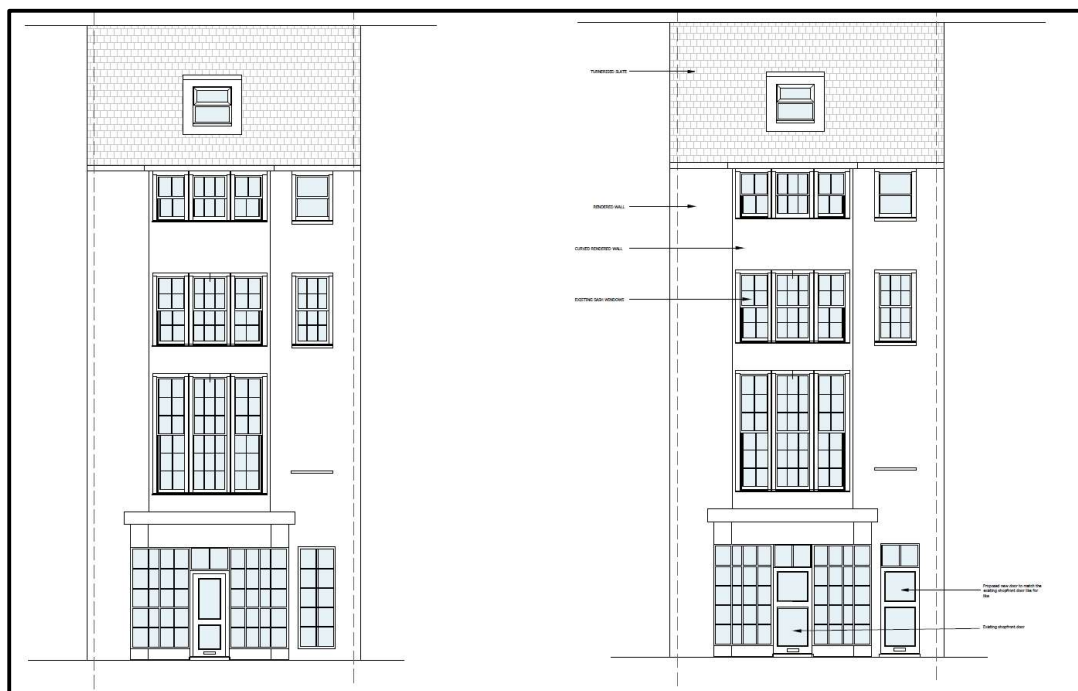


SCALE

4.10 The scale of the building will be unchanged.

AMOUNT

4.11 The appearance of the building would be largely unchanged. The only external alteration would be the replacement of the window to the right-hand side of the frontage with a door to allow access to the flats. The shopfront was replaced following the above 2021 applications so this alteration does not constitute loss of original historic fabric.



Existing (left) and proposed (right) front elevations

LANDSCAPING

4.12 The town centre location and surrounding of the building by public footpath and highway does not allow for any landscaping at street level. Notably, the council is about to embark on a street landscaping project at Montague Place which will complement the development.



ACCESS

- 4.13 Both retained commercial premises, and the new flats will benefit from pedestrian access from Montague Place. The flats will be served by the existing staircase running up through the building. It is not suitable to add a lift into the listed building.
- 4.14 The site is very sustainably located for access to public transport and the retail offer, leisure premises and social services of the town centre and seafront area.



5.0 RELEVANT PLANNING POLICIES

5.1 The following policies of the adopted Worthing Local Plan 2020 - 2036 are relevant:

SS3: Town Centre - looks to improve and increase the mix of uses in the Town Centre particularly retail, employment, community, residential, leisure, recreation, cultural and tourist facilities through maximising development around key development sites and through the more efficient use of existing sites.

DM1: Housing mix - applications for new housing are expected to consider local housing need and demand. The policy text states that one-bedroom dwellings comprise 5 -15% of identified housing need during the plan period.

DM2: Density - Development proposals must make the most efficient use of land, which will usually mean developing at densities above those of the surrounding area. Higher densities (over 100 dwellings per hectare) should be achieved in most mixed-use developments, flatted developments and developments located in the town centre. New dwellings are expected to meet, as a minimum, the Nationally Described Space Standards.

DM5: Quality of the built environment - development must; respect, preserve and enhance heritage assets and settings; and avoid harm to occupiers of adjacent properties.

DM6: Public realm - The enhancement of the public realm in Worthing, particularly in the town centre and seafront, is an integral part of the strategic objectives for the town. New development in appropriate locations, integrated sustainable transport initiatives or regeneration schemes will be expected to improve the public realm.

DM13: Retail and town centre uses - Changes of use and redevelopments within town, district and local centres will be carefully controlled to ensure that they support, rather than detract from, the successful functioning of the centres and their ability to meet local needs.



In the Secondary Shopping Frontage, a wider range of uses will be supported provided they are active uses with active shop fronts.

The efficient and effective use of the upper floors that add to the vitality and viability of centres will be encouraged subject to:

- i) the proposed use of the upper floor will not undermine the viability of the unit on the ground floor particularly those retail uses;
- ii) consideration will be given to the nature of the use, its appropriateness to the centre in which it is proposed, hours of operation, intensity of use and impact on nearby uses

DM15: Sustainable Transport and active travel - requires development to be in sustainable locations with good access to services and facilities.

DM16: Sustainable Design - Development is expected to meet relevant standards to move towards zero carbon development, prevent overheating and minimise waste.

DM17: Energy - New housing development should incorporate renewable and low carbon energy production equipment to meet at least 10% of predicted energy requirements.

DM20: Flood risk and sustainable drainage - Proposals in flood zones are to be supported by Flood Risk Assessments showing the development will not increase flood risk elsewhere. Whilst sustainable drainage systems are to be implemented unless it can be shown it would be inappropriate to do so.

DM24: The Historic Environment - Development will only be permitted where the appearance and significance of a listed building is not adversely affected. The special character of Conservation Areas must be preserved or enhanced.

5.2 The following paragraphs of the National Planning Policy Framework 2024 (NPPF) are relevant:



Paragraph 11 – Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.**

Paragraph 210 – In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets by putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*



6.0 PLANNING ASSESSMENT

6.1 The main considerations relating to this proposal are:

- Principle of development
- Housing mix and quality of accommodation
- Amenity of nearby occupiers
- Appearance of the listed building and conservation area
- Environmental sustainability
- Sustainable transport

These considerations are assessed below. Heritage considerations relating to the listed building and the South Street Conservation Area are discussed in the accompanying Heritage Statement.

Principle of development

- 6.2 Policy DM13 allows for the conversion of upper floors within the secondary shopping frontage where the viability of the commercial unit at ground floor is not compromised. The development will retain a usable E class unit with an active frontage at ground floor in the town centre.
- 6.3 The application is supported by Marketing Report evidence which sets out the difficulty of renting the whole building to an E class use. The building was on the market for more than 12 months without a new occupier being found. The Estate Agent stated ancillary floors above commercial spaces are hard to let as they are not often needed for contemporary business needs.
- 6.4 The application is also supported by a letter of intent from a potential new occupier who wants to takeover the smaller unit proposed. The intended health and beauty company wants to use the retained ground floor as their reception with treatment rooms at lower ground floor,
- 6.5 Residential is recognised as a suitable town centre use in Policy SS3. The Local Plan aspires to increase residential development in the town centre to help increase vitality, activity and footfall to enable regeneration. The development aligns with this aspiration.



6.6 As such, the development represents efficient and effective use of the upper floors of 11 Montague Place that complies with policies *SS3: Town Centre* and *DM13: Retail and town centre uses*.

6.6 Consequently, the principle of development is acceptable.

Housing mix and Quality of accommodation

6.7 One-bedroom flats are proposed due to the space and windows available within the mid-terraced building. Policy DM1 confirms there is a need for one-bedroom flats during the plan period and smaller units are often best provided in urban centres through flatted development. Policies *DM1: Housing mix* and *DM2: Density* are complied with.

6.8 In further compliance with *DM2*, all four proposed dwellings exceed the Nationally Described Space Standards (NDSS) requirements for overall space for their type. The internal space within each flat is labelled on the plans.

6.9 It is acknowledged that there is some divergence of bedroom size and flat sizes against the NDSS. For instance the ground floor flat, at 72m², is larger than the standard required for a one-bedroom, two-person flat but the bedroom is only single bedroom sized (9.5m²). The NDSS sets out minimum targets. There is nothing to say a single person flat cannot be larger than 50m². Whilst the one-bedroom, one-person flats at first and second floor are 45m² (above the 37m² required) but have bedrooms large enough to be considered doubles (12.1m²). It would be counterintuitive to artificially reduce the size of the bedrooms and the minimal alteration to the walls of the listed building is preferable in heritage terms. The section of floor / ceiling within the third and fourth floor flat is proposed to be removed to ensure sufficient head height over 2.3metres is provided.

6.10 Good levels of outlook over the interesting and attractive townscape will be available to all flats. The proposed flats will all be dual aspect (front and rear) allowing for outlook, natural light from varied angles and cross ventilation.

6.11 For these reasons, the proposal will provide good-quality dwellings that comply with Policy DM2.



Amenity of nearby occupiers

- 6.12 No new windows are proposed to the upper floors of the building, so that no new opportunities for overlooking of residential neighbours in the area. There are existing flats to the west to the upper floors of Knightsbridge House but there is no direct intervisibility between those flats and the proposed at 11 Montague Place.
- 6.13 The retained E class use and proposed residential use are accepted town centre elements that contribute to the vitality of the centre. There is no reason to suppose this mix would be harmful to the amenity of existing residents and occupiers.
- 6.14 The amenity element of Policy DM5 is complied with in this regard.

Appearance of the listed building and conservation area

- 6.15 The entrance door in the existing window opening to the right-hand side of the frontage is the only external change to the building. The architect has designed the new door to replicate the existing central door to the commercial unit. However, the applicant is willing to amend the details of the new door if the council consider a different style (i.e. multi-pane to replicate the window being replaced or a recessed door and steps like no12 and no13) if deemed more appropriate.
- 6.16 This minor alteration will have no material impact on the South Street conservation area which at Montague Place is typified by varied shopfronts and commercial activity. Policies *DM5: Quality of the built environment* and *DM24: The Historic Environment* are complied with.

Environmental Sustainability

- 6.17 Policy *DM16: Sustainable Design* at criterion (d) states that new housing (where not new build) should achieve a minimum EPC rating of C. However, listed buildings are exempt from EPC requirements meaning this policy requirement does not bite. As the development is a conversion with minimal construction work



there would be little to no construction waste which complies with the objectives of DM16.

- 6.18 *DM17: Energy* suggests renewable and low-carbon energy generating equipment includes photovoltaic panels, heat pumps and geo-thermal water heating. None of these solutions are appropriate to affix to the listed building. The development should be deemed an exemption to policy DM17.
- 6.19 A Flood Risk & Sustainable Drainage Assessment is included with the submission in light of the flood zone 3 location. The FRA notes that the site is brownfield land covered in buildings and hard surfaces. There will be no increase in impermeable surfaces through the scheme. This results in no adverse impact on the surface water flood risk to neighbouring sites. It is confirmed that the residential part of the development will be safe from flooding via the upper floor positioning. *DM20: Flood risk and sustainable drainage* is satisfied.
- 6.20 With regard to the NPPF sequential test, the site is an existing vacant building in a town centre location, where strategic policies direct flattened development. In terms of the exception test, the proposal provides new housing at a time of an identified shortfall in housing land and enhances an important town centre street frontage (so provides sustainable benefits to the community) and would not increase the risk of flooding elsewhere.

Sustainable Transport

- 6.21 The site is in a highly sustainable location for access to public transport. Multiple bus services alight on the adjacent coast road. Worthing railway station is within walking distance, approximately 1kilometre to the north. Future occupiers will not be reliant on the private car for transport which renders the lack of on-site car parking acceptable.
- 6.22 Numerous services, leisure facilities and employment opportunities surround the site. The level land in the area makes cycling a reasonable prospect for travel. For these reasons, policy *DM15: Sustainable Transport and active travel* is complied with.



7.0 CONCLUSIONS

- 7.1 Planning permission and listed building consent are sought at 11 Montague Place, Worthing for the *conversion of the E class premises over five floors to E class at lower ground and part ground floor with 4no one-bedroom flats above.*
- 7.2 11 Montague Place is a mid-terrace, four storey building constructed in the early 19th century. It is Grade II Listed as part of a group listing with no 12, 13 and 14. The building is in the secondary shopping frontage of the defined Worthing town centre and South Street conservation area.
- 7.3 The site has been vacant since early 2024. It had been occupied for many years as a hair salon (E class) with ancillary training rooms to the upper floors.
- 7.4 The principle of development is acceptable. The proposal will make efficient and effective use of the previously developed site contributing to the vitality of the town centre. An active ground floor frontage will be retained with four good-quality flats added to the local housing stock. Policies *SS3: Town Centre, DM1: Housing Mix, DM2: Density* and *DM13: Retail and town centre uses* are complied with.
- 7.5 Excepting a single new door at ground floor in place of a window there would be no external alterations to the building. No adverse impact would be caused to existing occupiers in the vicinity nor the appearance of listed building or conservation area. Policies *DM5: Quality of the built environment* and *DM24: The Historic Environment* are complied with.
- 7.6 The listed status of the building exempts it from the EPC requirements of policy *DM16: Sustainable design*. Similarly, it would be inappropriate to affix the renewable or low-carbon energy generating technology to the building suggested by policy *DM17: Energy*.
- 7.7 The flood risk assessment confirms that the development will be safe from flooding and not increase flood risk elsewhere. Policy *DM20: Flood risk and sustainable drainage* is complied with.



- 7.8 The site is very well located to access public transport with the level land around the site encouraging active travel to local shops and services. Policy *DM15: Sustainable transport and active travel* is complied with.
- 7.9 In the light of this, the Council are requested to grant prior approval for the proposed use without undue delay.

Lewis and Co Planning
April 2025