

ECE Planning

Planning, Heritage, Design and Sustainability Statement

40-42 South Street, Worthing

October 2025



ECE Planning

Project Name: 40-42 South Street

Location 40-42 South Street, Worthing, BN11 3AA

Client: Geneva Investment Group Ltd

File Reference: P2098

Issue	Date	Author	Checked	Notes
PL1	10.07.2025	S Lower	R Hoad	Initial Draft
PL2	07.10.2025	R Hoad	H James	Client Issue
PL3	20.10.2025	R Hoad	H James	Planning Issue

Contents

Figures	4
Tables.....	4
1. Introduction	5
2. The Site	6
3. Planning History	8
4. The Proposal	15
5. Policy Overview	17
5.1. Introduction	17
5.2. National Planning Policy Framework (NPPF)	17
5.3. Planning Practice Guidance (PPG)	17
5.4. Worthing Local Plan	17
5.5. Other Material Considerations- Worthing Space Standards SPD	18
5.6. Community Infrastructure Levy (CIL)	18
6. Planning Appraisal.....	19
6.1. Introduction	19
6.2. Principle of Development	19
6.3. Design, Form, Scale and Appearance	20
6.4. Heritage Assessment	21
6.5. Residential Amenity	23
6.6. Flood Risk and Drainage	23
6.7. Waste Assessment	25
6.8. Transport Assessment	25
6.9. Sustainability Statement	25
6.10. Landscaping Details	26
6.11. Biodiversity Net Gain	26
7. Conclusions	27

Figures

Figure 1 - Site Location Plan	6
Figure 2 - Approved Elevation from Marine Place (AWDM/0297/20).....	8
Figure 3 - AWDM/1367/23 Visuals	10
Figure 4 - AWDM/1906/22 Proposed Visual.....	10
Figure 5 - AWDM/1906/22 Proposed West Elevation	11
Figure 6 - AWDM/1884/22 Visual	11
Figure 7 - AWDM/1529/18 View South from Montague Place	12
Figure 8 - AWDM/0821/20 Approved Elevation from South Street	13
Figure 9 - AWDM/0821/20 Approved Elevation from Marine Place	13
Figure 10 - AWDM/1375/19 Approved Elevation from Marine Place	14
Figure 11 - Proposed Visual 01	15
Figure 12 - Proposed Visual 02	16
Figure 13 - Proposed Visual 01	21

Tables

Table 1 - Schedule of Accommodation.....	15
--	----

1. Introduction

- 1.1. This Planning, Heritage, Design and Sustainability Statement has been prepared on behalf of **Geneva Investment Group Ltd**, in support of a full planning application for the following application at 40-42 South Street, Worthing, BN11 3AA:

'Redevelopment including conversion, alterations and extensions to accommodate 205sqm of existing commercial floorspace (Use Class E) at ground floor, and 9no. residential flats across ground, first, second and third floors'.

- 1.2. This application follows the grant of planning permission under reference AWDM/0297/20 on 21 July 2020 for:

"Redevelopment including conversion, alterations, extensions and demolition of part of the existing building to accommodate 209sqm of existing retail space (A1 Use Class) at ground floor and 9 No. residential flats across ground, first, second and third floors."

- 1.3. Since obtaining planning permission for the above, a Section 73 application was submitted under reference AWDM/0469/22 but subsequently withdrawn.
- 1.4. The permission under reference AWDM/0297/20 has since lapsed and this new application therefore seeks consent for the original permission again, in addition to some minor design changes across the scheme, as set out in detail within this Statement.
- 1.5. It should be noted that since the original application under reference AWDM/0297/20, the rear storage building has since been demolished. This is shown indicatively on the plans for information purposes only.
- 1.6. This statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and an assessment of relevant planning conditions. The statement also considers the effects of the proposed redevelopment on the site and how it sits in relation to the South Street Conservation Area.
- 1.7. The proposals of the site have been informed by local and national planning policies including the National Planning Policy Framework, the Planning Policy Guidance and the Worthing Local Plan (2023).
- 1.8. This Planning Application seeks Full Planning Permission and is supported by the following documents and drawings:

- **Planning Application and CIL Forms**
- **Planning, Heritage, Design and Sustainability Statement**
- **Flood Risk Assessment and Flood Warning and Emergency Plan prepared by Motion**
- **Architectural Drawings including Site Location and Block Plan, Proposed Site Layout, Floorplans and Elevations**
- **Biodiversity Net Gain Exemption (included in this Statement)**

ECE Planning

2. The Site

- 2.1. The Site is located in Worthing Town Centre and has an area of approximately 0.04 ha. As illustrated in the accompanying Location Plan, the site is situated on the east side of South Street and backs onto Marine Place; these roads are connected by a pedestrian alleyway adjacent to the south of the site.
- 2.2. South Street (to the west) is one of the main highstreets within Worthing Town Centre and benefits from a large mixture of shops, banks and restaurants. The predominant use of the buildings along South Street are a mix of non-residential uses on ground floor and residential on first floor and above. Marine Place (to the east) is predominantly made up of the backs of the high street shops which front on to South Street as well as the rear of the properties that front onto Bedford Row.
- 2.3. A review of Worthing's Proposal Maps reveals that the site is situated within the identified Built-Up Area of Worthing, within the Town Centre Boundary and within The Primary Shopping Area (PSA). The PSA is identified as where the retail uses are concentrated. The South Street Character Area is therefore defined by aspirational high end retailing, food and beverage, and a commercial leisure quarter anchored by a leisure / entertainment 'destination'.

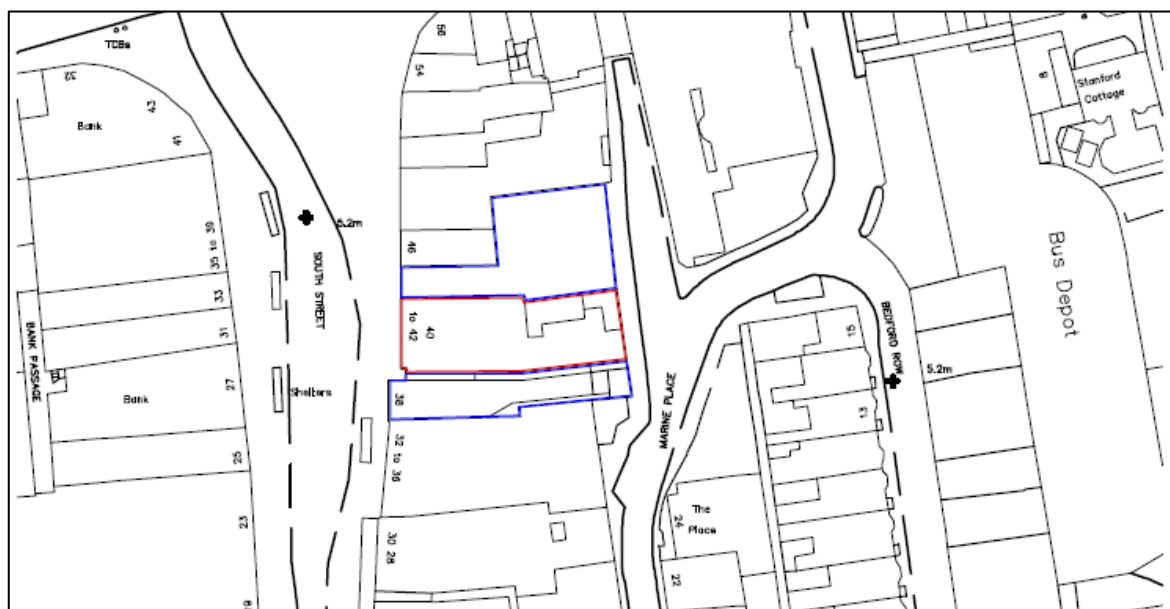


Figure 1 - Site Location Plan

- 2.4. The site is located in a highly sustainable location with the nearest bus stop on its doorstep to the West of the site and the nearest train station, Worthing Railway Station, approximately 900m away to the North. In addition, the property also sits approximately 150m from Marine Parade, which benefits from good transport connectivity to the wider area.
- 2.5. Furthermore, the site is located within the heart of the South Street Conservation Area. The Conservation Area's character preservation objectives are outlined in the Council's 'South Street Conservation Area Appraisal' document which is explored in further detail within this Statement.
- 2.6. Historic England's 'The List' has been consulted and reveals that the site is not Listed and is not directly situated next to a Listed building.

ECE Planning

- 2.7. The site, as existing, is currently used as 'Dolce Heaven' and is occupied on part of the ground floor only, with the rear being vacant/unused. The first, second and third storeys are all currently empty and vacant.
- 2.8. As set out briefly in the Introduction of this Statement, it should be noted that since the original application under reference AWDM/0297/20, the rear storage building has been demolished. This is shown indicatively on the plans for information purposes only.

3. Planning History

The Site Planning History

- 3.1. The following list of planning history for the site at 40-42 South Street is not a comprehensive list and only includes the most recent and relevant applications.
- 3.2. **Reference AWDM/0469/22. Redevelopment including conversion, alterations, extensions and demolition of part of the existing building and existing rear storage building to accommodate 209sqm of existing retail space (A1 use class) at ground floor and 9 no. residential flats across ground, first, second and third floors. Application to Vary Condition 1 (approved plans) of AWDM/0297/20. Withdrawn 24 July 2023.**
- 3.3. **Reference AWDM/0297/20. Redevelopment including conversion, alterations, extensions and demolition of part of the existing building and existing rear storage building to accommodate 209sqm of existing retail space (A1 use class) at ground floor and 9 no. residential flats across ground, first, second and third floors. Approved 21 July 2020.**
- 3.4. The application was considered to make a contribution to the supply of housing in a sustainable location, whilst retaining a viable retail use at ground floor level. The design was well considered and the LPA determined that the design would not cause any significant harm to the visual amenities of the site, character of the surrounding conservation area, or to the living conditions of neighbouring occupiers and subject to the recommended conditions, the proposals would provide a satisfactory living environment for future occupiers.
- 3.5. Since obtaining planning consent in 2020, the permission has now lapsed but is still recognised to be a significant material consideration in the determination of this application.

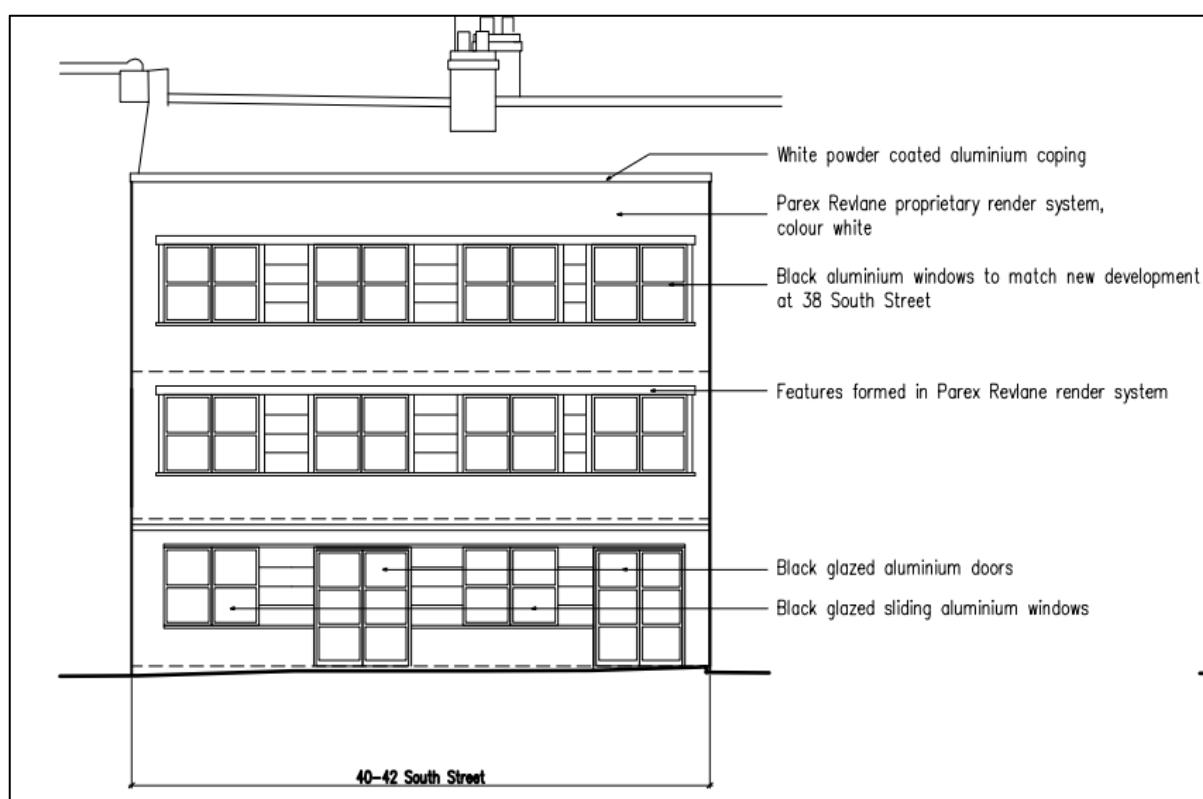


Figure 2 - Approved Elevation from Marine Place (AWDM/0297/20)

ECE Planning

- 3.6. **Reference AWDM/0614/18. Conversion of upper floors of existing building plus second and third floor extensions to frontage building including new and enlarged rear dormers; remodelling of rear building with first, second and third floor extensions, roof terraces; and elevational alterations, to provide 9 no. self-contained residential flats. 40 - 42 South Street Worthing West Sussex. Refused 5 December 2018.**
- 3.7. **Reference AWDM/0343/19. Lawful Development Certificate for proposed sub-division of existing shop on ground floor into two separate retail units. 40-42 South Street. Approved 23 April 2019.**
- 3.8. The above application sought to make efficient use of the commercial floorspace to create 2no manageable, smaller, fit-for-purpose retail units which would meet modern demands. The application was subsequently approved but not implemented.
- 3.9. **Reference AWDM/0941/16. Conversion of upper floors of existing building to form 6 x 1 bedroom residential units and 2 x 2 bedroom residential units, including second floor extensions to main building and rear storage building plus other alterations including new and enlarged dormers at rear, Juliet balconies and new windows. Approved 5 May 2017.**
- 3.10. The above application was permitted on 5 May 2017. It is considered that the above application set the principle that residential development is acceptable in this location. Additionally, the above application was not seen to have a detrimental impact on the visual amenity and effect on the character and appearance of the Conservation Area. Furthermore, the proposals were seen to be acceptable in terms of flood risk.

Relevant Planning History

- 3.11. It should be noted that a number of relevant precedent applications have been permitted within the immediacy as briefly set out below. The following are ordered in chronological order with the most recent application first. As clearly set out, the immediacy has been subject to a significant number of redevelopment applications.
- 3.12. **Reference AWDM/0995/24. Redevelopment including conversion and alterations, extensions at second floor and partial demolition at third floor of the existing building to retain commercial (Use Class E) at ground floor and accommodate 8no. residential flats across first and second floors. 48 South Street. Permitted 14 July 2025.**
- 3.13. The above application is situated to the north of the site and received consent for a comprehensive redevelopment to accommodate a mixed use of commercial at ground floor and residential above.
- 3.14. **Reference AWDM/1367/23. Conversion and alterations of existing building to provide 5no. residential apartments with associated works including access, landscaping and associated works and 2no. parking spaces. The Place Drop In Centre 24 Marine Place. Approved 1 March 2024.**
- 3.15. The above application is situated directly opposite (east) of the Applicant Site. The Applicant for AWDM/1367/23 was Adur & Worthing Council and the illustrative visuals provided within the Design & Access Statement can be seen below.



Figure 3 - AWD/1367/23 Visuals

- 3.16. **Reference AWD/1906/22. Redevelopment of the former Debenhams Building (including site over existing Iceland Car Park) to comprise a mixed use development including commercial floor space (Use Class E) at ground, part first and part second floor level, and 79 residential 1-2 bedroom flats from first floor to upper levels including the addition of two floors above Debenhams and Iceland sites with amenity spaces including sky lounge, home-working suite, storage lockers and bike store for residents. Development Site At Former Debenhams Store 14 To 20 South Street And Iceland Car Park. Approved 12 December 2023.**
- 3.17. The above application relates to the former Debenhams building which is located to the south. A visual of the proposed scheme for Debenhams can be seen in Figure 4 and the proposed elevation from the west (South Street) can be seen in Figure 5.



Figure 4 - AWD/1906/22 Proposed Visual



Figure 5 - AWDM/1906/22 Proposed West Elevation

- 3.18. **Reference AWDM/1884/22 Demolition of existing commercial storage buildings, erection of new 3-storey building containing 9 apartments, with additional studio/ office space at lower ground floor level. To include on-site secure bicycle and refuse storage, and the relocation of an existing electrical substation. 10 - 20 Marine Place Worthing West Sussex BN11 3DN. Approved 6 April 2023.**
- 3.19. The above application is located to the south of the site and to the east of Marine Place. A visual of the proposed scheme can be seen in Figure 6.



Figure 6 - AWDM/1884/22 Visual

ECE Planning

- 3.20. **Reference AWD/1080/20** The creation of 45 new residential apartments through the extension and change of use of the existing buildings including 3 additional storeys to Liverpool Buildings, elevation balconies at second and third floor levels and roof terrace at fourth floor. New shopfronts and external alterations to the elevation of Liverpool Buildings. New shopfronts and additional floor to South Street elevation with new windows at third and fourth floor. The creation of up to seven new retail units from existing retail floor space with flexible A1/A2 use and the change of use of an existing A1 unit to flexible A1/A2/A3 use, car parking and associated works. Application for minor material amendments to vary Condition 1 of previously approved AWD/1529/18. Amendments: First floor replacement windows, omission of proposed firewall to the south side roof and pitch line of mansard roof all relating to Block 7 (part retrospective). 19-23 South Street, Worthing, West Sussex BN11 3AN. Approved 24 August 2022.
- 3.21. The above S73 application followed approval of AWD/1529/18. The original application was also revised under reference AWD/1914/19 to increase the number of flats on the upper floors from 9 units to 13 units. The site location is to the west of South Street. A visual of the approved original scheme can be seen in Figure 7.



Figure 7 - AWD/1529/18 View South from Montague Place

- 3.22. **Reference AWD/0821/20** Variation of condition 1 of original approved permission AWD/1202/18 (as subsequently amended by approved AWD/0303/19) for external and internal alterations at ground floor to include demolition of part of rear wall and formation of vehicular access with internal parking area. Internal amendments to include changes to hallways and provision of lift. Also, inclusion of optional first floor plan to include layout of 2no additional flats under Permitted Development (subject of previous approval AWD/1023/19). 32-36 South Street, Worthing, West Sussex, BN11 3AA. Approved 3 November 2020.
- 3.23. The above S73 application followed approval of AWD/1202/18 which was subsequently amended by AWD/0303/19. The site is located to the south, on the west side of Marine Place. The approved elevation from Marine Place can be seen in Figure 8 and the approved elevation from South Street can be seen in Figure 9.

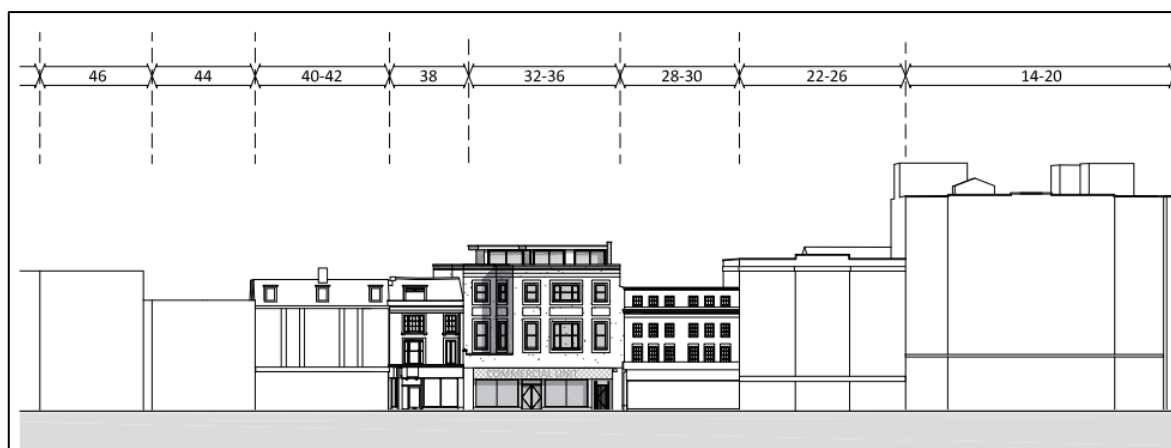


Figure 8 - AWDM/0821/20 Approved Elevation from South Street



Figure 9 - AWDM/0821/20 Approved Elevation from Marine Place

- 3.24. Reference AWDM/1375/19 Conversion, alterations, extensions and demolition of part of ground floor the existing building to accommodate 106sqm of existing commercial space (A3 use class) at basement level and ground floor, conversion of existing building fronting South Street to 1no 1-bedroom flat at first floor and 1no 2-bedroom maisonette at second and third floors, with new dormer to east elevation. Demolition and erection of rear building fronting Marine Place to accommodate 1no 3-bedroom dwelling. 38 South Street Worthing West Sussex BN11 3AA. Approved 26 February 2020.
- 3.25. The above application was later amended via a non-material amendment application under reference AWDM/0557/22 to create a private terrace area as well as fenestration amendments including to the doors, communal raised planter area and balustrading. The approved elevation under reference AWDM/1375/19 can be seen in Figure 10.



Figure 10 - AWD/1375/19 Approved Elevation from Marine Place

4. The Proposal

- 4.1. The proposal seeks to redevelop the existing building, including conversion and alterations of part of the existing building, and extensions to the rear of the building (fronting Marine Place) to retain approximately 205sqm of existing commercial space (Use Class E) at ground floor, and 9no. residential flats across ground, first, second and third floors at 40-42 South Street.
- 4.2. The below table provides the indicative schedule of accommodation:

Name	Level	Floor Area (in sqm)
Commercial Unit	Ground Floor	205
Flat 1 – 1 bed flat	First Floor	56
Flat 2 – 1 bed flat	First Floor	61
Flat 3 – 1 bed flat	Second Floor	65
Flat 4 – 1 bed flat	Second Floor	64
Flat 5 – 1 bed flat	Third Floor	46
Flat 6 – 1 bed flat	Ground Floor	55
Flat 7 – 1 bed flat	First Floor	46
Flat 8 – 1 bed flat	First Floor	39
Flat 9 – 2 bed flat	First and Second Floors	87
TOTAL		724

Table 1 - Schedule of Accommodation

- 4.3. As set out above, the residential flats would all be compliant with Nationally Described Space Standards. Flats 1, 7, 8 and 9 would all benefit from private amenity space in the form of either balconies or terraces.
- 4.4. The building fronting South Street will remain largely as existing with no external alterations proposed. The building fronting Marine Place will comprise 3 storeys in height which is comparable to neighbouring buildings, as illustrated below in the proposed visual. The architectural detailing as illustrated on no. 38 South Street has been continued on to the proposed site, in order to create harmony within the streetscene.



Figure 11 - Proposed Visual 01



Figure 12 - Proposed Visual 02

5. Policy Overview

5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Worthing Local Plan (2023).
- 5.1.3. Other material considerations include The National Planning Policy Framework ('the Framework') and Planning Practice Guidance ('PPG'). The Council also has a suite of Supplementary Planning Documents (SPDs) which are noted as appropriate.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. Updated in February 2025, the following are considered the most relevant sections of the Framework applicable to the proposed development and have been fully considered in the preparation of this application:

Chapter 2 – Achieving Sustainable Development

Chapter 5 – Delivering a Sufficient Supply of Homes

Chapter 6 – Building a Strong, Competitive Economy

Chapter 7 – Ensuring the Vitality of Town Centres

Chapter 9 – Promoting Sustainable Transport

Chapter 11 – Making Efficient Use of Land

Chapter 12 – Achieving Well-Designed Places

Chapter 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

Chapter 15 – Conserving and Enhancing the Natural Environment

Chapter 16 – Conserving and Enhancing the Historic Environment

5.3. Planning Practice Guidance (PPG)

- 5.3.1. Published in March 2014, the guidance is updated regularly and supplements the overarching objectives of the Framework. The relevant sections of the PPG have been fully reviewed in the preparation of this application.

5.4. Worthing Local Plan

- 5.4.1. The Worthing Local Plan (WLP) was formally adopted at Full Council on 28 March 2023 and supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 5.4.2. The WLP sets out 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 main policies of relevance are:

SP1 – Presumption in favour of sustainable development

SP2 – Climate Change

SP3 – Healthy Communities

SS1 – Spatial Strategy

SS2 – Site Allocations

SS3 – Town Centre

DM1 – Housing Mix

DM2 – Density

DM5 – Quality of the Built Environment

DM13 – Retail and Town Centre Uses

DM14 – Digital Infrastructure

DM15 – Sustainable Transport and Active Travel

DM16 – Sustainable Design

DM17 – Energy

DM18 – Biodiversity

DM19 – Green Infrastructure

DM20 – Flood Risk and Sustainable Drainage

DM21 – Water Quality and Sustainable Water Use

DM22 – Pollution

DM23 – Strategic Approach to the Historic Environment

DM24 – The Historic Environment

5.5. Other Material Considerations- Worthing Space Standards SPD

- 5.5.1. The Worthing Space Standards is a document to ensure that the floor area and associated storage space in new residential developments and conversions in Worthing is sufficient to secure a satisfactory standard of accommodation for residents. The Supplementary Planning Documents provides an opportunity to address some concerns over the inadequacy of space in some developments that have arisen over recent years.
- 5.5.2. The document has been reviewed in detail in preparation of this application and it is confirmed that the proposals fully comply.

5.6. Community Infrastructure Levy (CIL)

- 5.6.1. CIL is a payable charge on developments which create new or additional floor space where the Gross Internal Area (GIA) is 100 sqm or more, or where an additional dwelling is created.
- 5.6.2. In this instance CIL is charged at £125 (plus indexation) per sqm for developments of 10 dwellings or less.

6. Planning Appraisal

6.1. Introduction

6.1.1. This section of the Statement details how the proposed development complies with the policies set out within the Development Plan. The following matters are the principal considerations with regards to the proposal:

- **Principle of Development**
- **Design, Form, Scale and Appearance**
- **Heritage Assessment**
- **Residential Amenity**
- **Flood Risk and Drainage**
- **Waste Assessment**
- **Transport Assessment**
- **Sustainability Statement**
- **Landscaping Details**
- **Biodiversity Net Gain**

6.2. Principle of Development

6.2.1. This application seeks consent for the redevelopment of an existing brownfield site to retain 205sqm of existing commercial floorspace (Use Class E) at ground floor, and accommodate 9no. residential flats across ground, first, second and third floors. The proposals therefore comprise of a mixed use development and follows previous extensive history, where the principle of redevelopment for a mixed use building has previously been granted.

6.2.2. As set out previously within this Statement, the site is located within the built up area boundary where the presumption for sustainable development is favoured. The site comprises a brownfield site within a highly sustainable location within the town centre, meeting the requirements of the Framework. It further delivers key objectives of Policy SS1 of the Local Plan which seeks to deliver regeneration objectives on key town centre sites, and with a focus on brownfield land. The redevelopment of this land is therefore strongly encouraged by both national and local planning policy.

6.2.3. In addition to the above and as set out in full within the Planning History Section of this Statement, there are a mix of commercial and residential developments in the vicinity of the site which have been accepted by the Council, further confirming the acceptance in principle of a mixed use redevelopment of the site.

6.2.4. It should be noted that the LPA noted that the commercial floorspace to be retained as part of the previous scheme was considered acceptable and would *'appear to be sufficient to ensure a viable retail unit could be retained'*. The proposals seek to retain circa 205sqm and would therefore remain acceptable and would be in accordance with Policy SS3 (Town Centre) of the Local Plan which seeks 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.'*

6.2.5. By retaining an element of the ground floor for commercial space, the proposals would further be in accordance with Policy DM13 (Retail and Town Centre Uses) of the Local Plan and the conversion of the upper floors should be encouraged insofar as the conversion would *'not undermine the viability of the unit on the ground floor'*.

6.2.6. The LPA also noted the following in response to the previously approved proposals:

ECE Planning

'Whilst the principle of development would need to be addressed as part of a supporting planning statement, as discussed further below, some of the key benefits associated with the proposal could include the efficient use of brownfield land to provide high density housing within a highly sustainable and accessible location to meet the Borough's housing need which would be afforded weight. In addition, the proposal would in my opinion provide an opportunity to improve the relatively unattractive, albeit varied appearance of the rear part of the building (facing Marine Place) within a historic environment which has the potential to enhance the character and appearance of the conservation area, and the setting of neighbouring listed buildings.'

- 6.2.7. The same conclusions are considered to apply to the current proposals and the redevelopment of the site should be viewed as an important and valuable opportunity to provide much needed housing in the Borough, in a highly sustainable Town Centre location on brownfield land, where development is encouraged under Policy SS1 (Spatial Strategy) of the Local Plan.
- 6.2.8. Furthermore, the proposals would not seek to demolish any usable floorspace (only a small section of floor area on the third floor which comprises access to the roof) and would make good use of the existing building, therefore representing a highly sustainable solution when compared to demolition and complete rebuild, responding fully to Policy SP2 (Climate Change) of the Local Plan.
- 6.2.9. In terms of the proposed residential use, the proposal seeks to accommodate 9no. residential flats and is in accordance with national and local planning policy. Paragraph 90(f) of the Framework further recognises the important role of residential development within town centres and paragraph 125(c) requires substantial weight to be given to using suitable brownfield land within settlements for homes.
- 6.2.10. The development has been design-led to optimise housing provision and the delivery of 9no. dwellings makes a significant contribution to Worthing's housing land supply. Worthing is notably constrained by the sea to the south and the South Downs National Park to the north and unable to fully meet its objectively assessed housing needs. Therefore, optimisation of well-located, brownfield sites is particularly important and required also by Paragraph 125 of the Framework and Local Plan Policy DM2.
- 6.2.11. Whilst Worthing Borough Council suggest that they can demonstrate a 5 year housing land supply, this is predicated on the delivery of key brownfield sites such as 40-42 South Street. Notwithstanding this, Worthing Borough Council has not met the Housing Delivery Test, meaning the tilted balance under Paragraph 11(d) of the Framework (and Local Plan Policy SP1) is engaged. Therefore any disbenefits of the scheme would have to significantly and demonstrably outweigh the benefits of housing delivery on this Site if permission is to be withheld.
- 6.2.12. Delivery of 9no. dwellings is therefore fully in accordance with Local and National policies and makes an important and meaningful contribution to housing land supply.

6.3. Design, Form, Scale and Appearance

- 6.3.1. The design, form, scale and appearance of the proposals have been designed sensitively to represent a high quality redevelopment opportunity and reflects the previous planning history on the site, in addition to surrounding redevelopment applications.

ECE Planning

- 6.3.2. In terms of scale and mass, the building fronting South Street remains as existing and no changes are proposed to this elevation. In respect of the building fronting Marine Place, the scale and mass reflects neighbouring buildings, particularly to the south (no. 38 South Street), and does not extend past 3 storeys. As illustrated in the below visual, the proposed building would sit in conformity with the neighbouring properties and reflect similar architectural features such as black windows, brick detailing, flat roofs etc.



Figure 13 - Proposed Visual 01

- 6.3.3. The proposed building would represent a contemporary addition to the streetscene and would be an important visual enhancement. The proposed scale and massing of the proposals is considered to be entirely acceptable and responds to the immediacy, whilst accommodating an acceptable mix of residential units, in accordance with Policy DM1 (Housing Mix) of the Local Plan.
- 6.3.4. In reviewing the Local Plan policies, it is noted that Policy DM2 (Density) 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 proposed density would equal approximately 225 dwellings per hectare which would be comparable to neighbouring schemes and appropriate for a flatted development in a town centre location.
- 6.3.5. In relation to materials, the proposed scheme seeks to retain the existing façade facing South Street but seeks to accommodate render to the rear of the building, fronting Marine Place. As set out in Section 3 of this Statement, a majority of the redevelopment applications fronting Marine Place comprise of white render and therefore this material is considered to be entirely acceptable. The proposals will therefore result in a contemporary building to the rear which reflects the immediacy by adopting similar materials, whilst significantly enhancing the surrounding area. The front façade will be retained as existing.
- 6.3.6. To conclude, the proposed design, form, scale and appearance of the building is considered to be entirely acceptable and will have a significant visual enhancement to the immediacy of the area.

6.4. Heritage Assessment

- 6.4.1. Policy DM23 of the Local Plan requires the Council to conserve and enhance the historic environment and character of Worthing, which includes historic areas, buildings, features, archaeological assets and their settings, important views and relationships between settlement and landscapes/seascapes.

ECE Planning

- 6.4.2. Chapter 16 of the Framework emphasises the importance of protecting the significance heritage assets, with great weight given to an asset's conservation.
- 6.4.3. The application site is not Listed itself and is not directly situated next to a Listed building. The site is however located within the heart of the South Street Conservation Area. The Conservation Area's character preservation objectives are outlined in the Council's 'South Street Conservation Area Appraisal' document and it is noted that South Street with Chapel Road to the north is the central north-south axis of Worthing Town Centre.
- 6.4.4. It is noted from the Conservation Area Appraisal that South Street is a *'particularly important townscape element of the Conservation Area'* and that the Street *'has been subject to gradual redevelopment over many years and therefore the buildings show a variety of styles beginning from the early 19th century. Most of the buildings contribute significantly to the character and appearance of the area and many have considerable local historic or architectural interest'*. Some of the *'architectural historic and townscape elements which should be preserved'* are noted below:
- *'Interesting and attractive buildings individually and in townscape terms.'*
 - *'Buildings three to four storeys high.'*
 - *'Buildings built at the back of the pavement.'*
 - *'A variety of original architectural detailing which is evident on many period properties, including string courses, parapets, window dressings, pilasters, cornices, and window frames.'*
- 6.4.5. In consideration of the above, previous planning history on the site and in the immediate area, the South Street elevation is proposed to remain as existing in order to not have any impact on the surrounding heritage environment. The alterations and extensions have been focused towards Marine Place which has been subject to many different applications over the years and therefore subject to change.
- 6.4.6. Marine Place is noted in the Conservation Area Appraisal where it states that *'at the rear of Bedford Row to the west is Marine Place wherein is located the listed Bedford Cottage and several buildings of significant local historic or architectural interest'*. Some of the *'architectural historic and townscape elements which should be preserved'* are noted below:
- *'The original architectural detailing on the period properties such as slate roofs, cant bays or bows with timber sliding sash windows, plaster mouldings, balconies, and railings.'*
- 6.4.7. The Conservation Area Appraisal does note the following possible enhancement opportunities for Marine Place:
- *'Marine Place: Design and implement a landscaping scheme for the car parking area at the rear of Debenhams to enhance the street scene and the setting of Bedford Cottage, or permit appropriate infill development which equally should enhance the street scene and the setting and situation of Bedford Cottage and the attached buildings.'*
 - *'Marine Place: Encourage appropriate redevelopment or enhancement schemes which improve the appearance of service accesses to the rear of properties on South Street'*
- 6.4.8. The proposed redevelopment is considered to be entirely in line with the Conservation Area Appraisal, and the possible enhancement opportunities as noted above. The scheme is considered to be entirely appropriate in relation to the surrounding built environment, but also the surrounding historic environment.

ECE Planning

- 6.4.9. The current proposed development has been carefully and sensitively designed in relation to the surrounding area and has fully considered surrounding precedent applications. In this regard, the carefully designed extensions are considered to be an acceptable solution and would not have a detrimental impact on the historic environment which would be in full accordance with Policy DM5 (The Quality of the Built Environment), Policy DM23 (Strategic Approach to the Historic Environment) and Policy DM24 (The Historic Environment) of the Local Plan.
- 6.4.10. Overall, the proposal has a positive impact on the built and historic context, achieving a high standard of design and layout that results in no adverse impacts upon the identified heritage assets, and enhances the overall setting.

6.5. Residential Amenity

- 6.5.1. Policy DM5 of the WLP states that all new development should *'not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise giving rise in significant adverse impacts, or vehicular movements resulting in severe cumulative impacts on the road network, or loss of important open space of public value (unless it satisfies any of the exceptions set out under Policy DM7 – Open Space, Recreation and Leisure).'*
- 6.5.2. Paragraph 135 of the NPPF closely follows this policy and states that planning policies and decisions should ensure that developments *'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users..'*
- 6.5.3. The plans have been designed to ensure that there is no detrimental impact on neighbouring properties, and fully consider proposed amenity between flats. The use of obscure glass screens at 1.4m high have been accommodated within the site where necessary to ensure that there is no overlooking between flats; for example between Flats 3 and 9.
- 6.5.4. The positioning of the flats and layouts are otherwise reflective of the previous planning consent on the site, approved under reference AWDM/0297/20. The proposals were found to be acceptable in terms of residential amenity in relation to the previous approval and therefore are considered to remain acceptable.
- 6.5.5. To conclude, the proposals would not result in unacceptable impacts to existing or proposed residents and therefore there would be no detrimental impact to residential amenity but there would be significant positive impacts which take account of previously raised matters as part of application reference AWDM/0469/22.

6.6. Flood Risk and Drainage

- 6.6.1. A Flood Risk Assessment (FRA) and a Flood Warning and Emergency Plan (FWEP) have been prepared by Motion in support of the proposed redevelopment, to provide ground floor commercial floorspace and 9 residential flats across the ground, first, second and third floors.
- 6.6.2. Whilst the accompanying Reports should be reviewed in detail, the below provides an overall summary of the two reports.

Flood Risk Assessment

- 6.6.3. The site lies within Flood Zone 3 (tidal flood risk), though is in a defended location benefiting from maintained shingle beach defences designed to a 1 in 200-year standard.

ECE Planning

- 6.6.4. The front of the building sits at approx. 4.8m AOD, which could experience up to 400mm flooding in a 1 in 100-year tidal event. This is where the commercial is located and remains as existing, therefore is not considered to be a concern in the determination of the application.
- 6.6.5. The rear of the site, where residential access is located, is around 5.8m AOD, providing c.600mm freeboard above modelled flood levels and safe, dry access to Marine Place. As set out within the Report, there are precedent applications in the immediacy where such scenarios have been accepted by the Environment Agency and therefore the proposed units at ground floor are considered to be acceptable. Residential units above ground floor are also entirely acceptable and above predicted flood levels.
- 6.6.6. Surface water, groundwater, sewer, reservoir and other artificial flood risks are all assessed as very low to low.
- 6.6.7. With climate change allowances, some future surface water risk is possible at the front of the site, but safe dry access to the rear will remain available.
- 6.6.8. Mitigation measures include flood-resistant/resilient construction to the commercial frontage, raising services and power outlets, and provision for temporary flood barriers if needed.
- 6.6.9. The FRA concludes the development is appropriate and safe for its lifetime, in line with the NPPF and supported by precedent from nearby consents.

Flood Warning & Emergency Plan

- 6.6.10. Provides procedures for preparing for, responding to, and recovering from flood events, ensuring residents, staff and visitors can act safely.
- 6.6.11. Recommends appointing a Flood Warden, responsible for monitoring warnings, coordinating evacuations, liaising with emergency services, and keeping the plan updated.
- 6.6.12. Evacuation route identified via Marine Place to Bedford Row to Warwick Street, leading to safe refuge outside the flood risk area.
- 6.6.13. Clear protocols for communication, shut-off of utilities, protective actions for equipment and stock, and evacuation of vulnerable residents are established.
- 6.6.14. The plan emphasises regular training and drills, maintaining insurance and emergency contacts, and treating the FWEP as a living document to be reviewed every three years or after incidents.
- 6.6.15. Recovery guidance includes clean-up, repairs, liaison with insurers, and working with local authority flood recovery services.

Overall Conclusion:

- 6.6.16. The FRA demonstrates that, despite the site's Flood Zone 3 designation, the proposed development is acceptable in planning terms, with residential units safeguarded above flood levels and safe access maintained. The FWEP ensures robust procedures are in place to manage residual risk. Together, these documents confirm that the scheme is compliant with national planning policy on flood risk and that occupants can be kept safe throughout the lifetime of the development.

ECE Planning

6.7. Waste Assessment

- 6.7.1. As illustrated in the proposed plans, the residential flats would benefit from a communal bin store which would be accessed from Marine Place at located at ground floor. It should be noted that the bin store would be separate from the bike store. Refer to the proposed plans.
- 6.7.2. The number of bins proposed is in accordance with the LPAs External Space Standards document.
- 6.7.3. The Waste Collectors would have access to the bin store from Marine Place.

6.8. Transport Assessment

- 6.8.1. The site is located in a highly sustainable location with the nearest bus stop on its doorstep to the West of the site and the nearest train station, Worthing Railway Station, approximately 900m away to the North. In addition, the property also sits approximately 150m from Marine Parade, which benefits from good transport connectivity to the wider area.
- 6.8.2. As such, the proposals do not include the provision of car parking spaces due to the highly sustainable nature of the site.
- 6.8.3. Sufficient cycle storage is proposed which is compliant with WSCC Highway standards, and can be accessed via the ground floor. Please refer to accompanying plans.

6.9. Sustainability Statement

- 6.9.1. Paragraph 166 of the NPPF requires new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.9.2. Policy DM16 of the Local Plan states that *'all development will be required to achieve the relevant minimum standards below unless superseded by national planning policy, Building Regulations or it can be demonstrated that it is not practicable, feasible or viable (in which case the minimum standard should be met as far as is possible).'* The standards as listed under Policy DM16 include:
 - Towards Zero Carbon Development
 - Preventing Overheating
 - Minimising Waste
- 6.9.3. It is noted that Policy DM16 requires all new build housing and new non-domestic buildings to meet specific carbon reduction targets as part of the proposals. It should however be noted that the proposed scheme is largely a proposed conversion with some minor extensions to the rear to accommodate a new building fronting Marine Place.
- 6.9.4. Policy DM16 goes on to states that all new development should incorporate design measures where appropriate to prevent overheating. Whilst this policy does not specifically identify that it also relates to conversions, it is considered that the proposed scheme has been designed to take account of the existing landform, building orientation and massing in order to minimise energy consumption and work within the parameters of this brownfield site.

ECE Planning

- 6.9.5. Policy DM16 states that in terms of minimising waste, that *'all new development will be required to follow the waste hierarchy to minimise the amount of waste disposed to landfill and incorporate facilities that enable and encourage high rates of recycling and re-use of waste and materials.'* It should be noted that by reason of being a conversion and only minor extensions, the proposals will significantly reduce carbon emissions by repurposing the existing, vacant structure and therefore minimises the amount of waste as far as possible when compared to a demolition and new build scheme.
- 6.9.6. Policy DM17 of the Local Plan follows on from Policy DM16 and states that all new housing development should incorporate renewable and low carbon energy production equipment to meet at least 10% of predicted total energy requirements (after CO₂ reductions from energy efficiency measures). Again, whilst this does not specifically identify that conversions are included in this, it is considered that further sustainability measures can be secured via condition, if necessary.
- 6.9.7. To conclude, the proposal is considered to represent a highly sustainable form of development in accordance with policy and situated within a highly sustainable location. As such, the scheme is considered to be entirely acceptable.

6.10. Landscaping Details

- 6.10.1. The proposed scheme does not propose any soft landscaping as part of the development due to the highly constrained nature of the site. Any hard landscaping necessary can be secured via condition.

6.11. Biodiversity Net Gain

- 6.11.1. In terms of the BNG requirements, please note that the site is exempt from Biodiversity Net Gain requirements as <25m² of vegetated habitat will be affected by the proposed development, as determined under 'de minimis exemption' conditions of The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

7. Conclusions

- 7.1. This application seeks full planning consent for the *'Redevelopment including conversion, alterations and extensions to accommodate 205sqm of existing commercial floorspace (Use Class E) at ground floor, and 9no. residential flats across ground, first, second and third floors'* at 40-42 South Street in Worthing.
- 7.2. This application follows the grant of planning permission under reference AWD/0297/20 on 21 July 2020 for:
- "Redevelopment including conversion, alterations, extensions and demolition of part of the existing building to accommodate 209sqm of existing retail space (A1 Use Class) at ground floor and 9 No. residential flats across ground, first, second and third floors."*
- 7.3. The permission under reference AWD/0297/20 has since lapsed and this new application therefore seeks consent for the original permission again, in addition to some minor design changes across the scheme, as set out in detail within this Statement.
- 7.4. It has been demonstrated that the proposed redevelopment of 40–42 South Street represents a highly sustainable and well-considered scheme which responds positively to both the planning history of the site and the surrounding context of Worthing Town Centre. The principle of mixed-use redevelopment has already been established through previous permissions, and this application continues that approach by retaining viable commercial space at ground floor whilst delivering nine high-quality residential units above.
- 7.5. The design and scale of the development have been sensitively informed by the character of South Street and Marine Place, ensuring that the proposal enhances the Conservation Area while respecting neighbouring buildings. By repurposing an underutilised building, the scheme contributes to regeneration objectives, secures much-needed homes within a constrained Borough, and makes efficient use of a brownfield site in a highly accessible location.
- 7.6. The submitted Flood Risk Assessment and Flood Warning & Emergency Plan prepared by Motion confirm that while 40–42 South Street lies within Flood Zone 3, the site benefits from maintained tidal defences and residential access is located at higher levels with at least 600mm freeboard above modelled flood events, ensuring safe, dry egress to Marine Place. All other sources of flooding are assessed as very low to low risk, and the proposed development incorporates appropriate flood-resilient measures. The accompanying FWEP provides clear procedures for preparation, evacuation and recovery, ensuring the safety of residents and users. Accordingly, the development is compliant with the requirements of the NPPF and demonstrates that it will be safe for its lifetime without increasing flood risk elsewhere.
- 7.7. The proposals comply with the relevant policies of the Worthing Local Plan, the National Planning Policy Framework, and other material considerations. There are no significant adverse impacts identified in terms of heritage, design, amenity, transport, flood risk, waste, or sustainability. On the contrary, the development provides a number of clear benefits, including housing delivery, town centre regeneration, and the enhancement of a prominent site within the South Street Conservation Area.
- 7.8. Accordingly, it is concluded that the proposals represent a sustainable form of development that accords with the Development Plan when read as a whole, and there are no material considerations that indicate otherwise. Planning permission should therefore be granted without delay.