

MME PLANNING SERVICES

Subdivision of 3no permitted flats on the second, third
and fourth floors to form 3no additional flats.

at

Development Site At Former Debenhams Store 14 to 20
South Street and Iceland Car Park, Marine Place,
Worthing, West Sussex, BN11 3AA

Planning, Heritage and Design & Access Statement

Ref: P-089

February 2026

Version 1



Figure 1: Site Location

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1. Introduction

- 1.1 MME Planning Services is instructed to prepare this full planning application for the subdivision of 3no permitted flats on the second, third and fourth floors to form 3no additional flats at the Former Debenhams Store 14 to 20 South Street and Iceland Car Park, Marine Place, Worthing, West Sussex, BN11 3AA.
- 1.2 This application follows the approved application under planning reference AWDM/1906/22 which granted permission for the creation of 80no flats to the upper floors of the site, with commercial / retail use retained to the ground floor and part of the first and second floors.
- 1.3 Following consideration of the approved scheme as set out above, and in order to maximise this sustainable site within the centre of Worthing, permission is sought for the addition of 3no flats to the upper floors of the existing building. This statement sets out the proposed scheme in detail with regard to the following aspects: the planning history of the site, the development proposals, the relevant planning policy, the planning merits of the scheme and how the proposals comply with the Council's policies.

2. Site, Surroundings and Background

- 2.1 The application site comprises the former Debenhams department store building and the airspace above a building with an existing car park associated with the Iceland supermarket, located on the western side of Marine Place, within the town centre of Worthing. The site is located within the South Street Conservation Area and Environment Agency (EA) Flood Zone 3. The surrounding area comprises a mix of commercial and residential properties. The site is located in close proximity to the seafront and Worthing Pier to the south.
- 2.2 South Street, located to the western side of the application site is characterised by attractive buildings of architectural and historical merit which have retained original features.
- 2.3 It is noted that there is a row of Grade II listed buildings located further to the east of the site and planning permission has been granted on the opposite side of Marine Place for a mixed residential and commercial development under planning reference AWDM/1884/22 in April 2023.

3. Planning History

- 3.1 Planning Application – Ref: AWDM/1906/22 – Description: 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 80 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 – Decision: Approved, 12/12/2023.
- 3.2 Discharge of Condition Application – Ref: AWDM/0423/24 – Description: Approval of Details Reserved by Condition 8 (Construction Management Plan) of Application No AWDM/1906/22 – Decision: Approved, 28/10/2024.
- 3.3 Discharge of Condition Application – Ref: AWDM/0459/24 – Description: Approval of Details Reserved by Condition 10 (Surface Water Drainage) of Application No AWDM/1906/22 – Decision: Approved, 02/10/2024.
- 3.4 Non-Material Amendment Application – Ref: AWDM/0482/24 – Description: Non-material amendments to planning application AWDM/1906/22 including division of commercial space at ground floor to two units; new shopfronts to South St including loss of lobby, new access door and stairs to first floor; commercial refuse store reduced in size; retail bike storage reduced; ground floor Marine Place fenestration alterations; ground floor storage lockers changed to commercial space; loss of one residential unit at first floor; changes to commercial floor space at first and second floors; service risers, refuse chute, cardboard store and lobby removed and flats enlarged; western elevation wall increased at first floor reducing amenity space for units 16-20; terrace removed and wall increased on south elevation at first floor; changes to building line at second floor to east and south; south facing terraces at third floor altered and building line rationalised; fenestration alterations at third floor on east and south elevations and at fourth floor on south elevation including an additional window; reduction in some setbacks at fourth and fifth floors; increase in height of fourth floor to south-east; communal lounge and terrace decreased in size; subdivision of flat into two with private terraces; rooflight added; overall building height of fifth floor reduced; ASHP roof plant reduced; solar PV panels increased; alterations to fenestration of east elevation stair core; and roof steps removed. – Decision: Approved, 11/11/2024.

- 3.5 Discharge of Condition Application – Ref: AWDM/1299/25 – Description: Approval of Details Reserved by Conditions 5 (design details) and 6 (specification of materials) of application AWDM/1906/22 – Decision: Under Consideration

4. Proposals

- 4.1 As detailed above, planning permission is sought for the creation of 3no additional flats within the host building. The proposals involve the subdivision of 3no larger flats to the second, third and fourth floors to form the additional units.
- 4.2 The larger flats as permitted consist of 2-bed, 4-person units. The proposals would facilitate the creation of 1no 1-bed, 2 person unit and 1no 1-person studio to the second floor; and 1no 1-bed, 1-person unit and 1no 1-person studio to the third and fourth floors respectively. As such, the proposals would result in an overall reduction in occupancy from 12no persons to 7no persons.
- 4.3 In order to facilitate the creation of the 3no additional units, minor internal re-configuration works would be required. No external alterations are proposed as part of this application. The proposals would comply with Nationally Described Space Standards (NDSS). The proposed additional and retained dwellings would continue to benefit from appropriate levels of natural light and light within the flats. Given the reduction in occupancy, no concerns would be raised in terms of capacity and the facilities to be provided to serve the overall development on site as previously permitted, such as refuse and recycling, and cycle storage etc, would continue to be sufficient.
- 4.4 In addition, the proposed subdivision to the upper floors of the building to form 3no additional units would not have any detrimental impact with regard to flood risk or fire safety. As no external alterations are proposed as part of this submission, there would also be no detrimental impact on the character of the host building, the surrounding Conservation Area or the make-up of the street scene.
- 4.5 It is noted that the previously approved scheme for the overall development of the site under planning reference AWDM/1906/22 was considered to be unviable, with an off-site contribution agreed to cover the affordable housing requirement for the development. While the development would, overall, continue to be unviable, the additional flats would aid in maximising the potential for this town centre site and provide valuable residential units within a highly sustainable location.

5. Planning Policy

National Planning Policy Framework (NPPF) (2024) and National Guidance

- 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 Running throughout the NPPF is a presumption in favour of sustainable development. Sustainable development is achieved through three main objectives which are – economic, social and environmental.
- 5.3 Paragraph 11 of the NPPF states that for decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, planning permission should be granted unless the policies of the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or, any adverse impact of doing so would 'significantly and demonstrably outweigh the benefits' when assessed against the policies of the NPPF when taken as a whole (NPPF paragraph 11 (d)).

Worthing Local Plan (WLP) (2023)

- 5.4 Paragraph 34 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. The Worthing Local Plan (WLP) was adopted in March 2023 and is therefore considered to be up-to-date and the most relevant policy document in considering this application.
- 5.5 The main WLP policies relevant to this application are as follows:
- SP1 - Presumption in favour of sustainable development
 - SP2 - Climate change
 - SP3 - Healthy communities
 - SS1 - Spatial strategy
 - SS3 - Town Centre
 - DM1 - Housing mix
 - DM2 - Density
 - DM3 - Affordable housing
 - DM5 - Quality of the built environment

- DM6 - Public realm
- DM7 - Open space, recreation & leisure
- DM8 - Planning for sustainable communities / community facilities
- DM10 - Economic Growth and Skills
- DM12 - The visitor economy
- DM13 - Retail and town centre uses
- DM15 - Sustainable transport and active travel
- DM16 - Sustainable design
- DM17 - Energy
- DM18 - Biodiversity
- DM19 - Green infrastructure
- DM21 - Water quality and sustainable water use
- DM22 - Pollution
- DM23 - Strategic Approach to the historic environment
- DM24 - The Historic Environment

Supplementary Planning Documents (SPDs)

5.6 Relevant SPDs to this application are as follows:

- Supplementary Planning Document 'Space Standards' (WBC 2012)
- Supplementary Planning Document 'Sustainable Economy' (WBC 2012)
- 'Infrastructure Delivery Plan' (WBC 2010)
- Worthing Open Space Strategy and Off Site Calculator

6. Planning Considerations

Principle of Development

6.1 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.

- 6.2 Policy SS3 deals with development in Worthing Town Centre, seeking to direct retail leisure and office use to the Town Centre, improving and increasing the mix of uses in the Town Centre, particularly retail, employment and residential uses through making efficient use of existing sites. Policy DM13 requires the Council to support the vitality and viability of Worthing's town centres, with changes of use and redevelopments within town centres being carefully controlled to ensure that they support the successful functioning of the centres and their ability to meet local needs.
- 6.3 As set out above, the principle of a residential use to the upper floors of the site has previously been established under planning reference AWDM/1906/22, with a commercial use retained at ground floor level. The current proposal would maintain this mix and simply result in a modest uplift in the total number of flats to be provided on site.
- 6.4 As highlighted by the Council within the previous committee report for application reference AWDM/1906/22, the site is amongst the most suitable in Worthing for intensive development given its central town centre location close to shops, services and public transport links. The close proximity to the seafront adds to the suitability of the site for residential development creating a desirable and sought after location to live.
- 6.5 Overall, the proposal to provide 3no additional flats would continue to make good use of a vacant and underutilised site and would not represent a marked increase or raise any issue in terms of capacity or strain on the services to be provided on site or within the surrounding areas. The proposal would therefore accord with the aims of the WLP with regard to development in Worthing Town Centre and would be acceptable in principle.

Sustainability

- 6.6 Policy SP2 of the Local Plan requires development to reduce the amount of energy used in construction and operation of buildings and improve energy efficiency, including retrofitting existing properties, to contribute to achieving zero carbon emissions, also to prioritise active travel such as walking, cycling and public transport to reduce reliance on the private car and facilitate car free lifestyles.

- 6.7 The development on site as permitted under planning reference AWDM/1906/22 has commenced and the applicant is committed to carrying out the works in accordance with the details previously approved in this regard. The works to provide the 3no additional flats will also be carried out in accordance with these details. Given the location of the site within Worthing Town Centre and the methods and practices to be utilised for the conversion works, the proposals represent a highly sustainable form of development.

Design, Appearance, and Heritage Considerations

- 6.8 Policy DM5 of the adopted Local Plan requires that all new development should be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area. Policy DM2 of the Local Plan supports higher densities, in excess of 100 dwellings per hectare in mixed use developments, flatted developments and developments located in the town centre and in areas close to public transport interchanges and services.
- 6.9 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 settlements and landscapes/seascapes. Policy DM24 of the Local Plan states that Development should not adversely affect heritage assets or its setting (including important views that contribute to its setting).
- 6.10 As detailed above and within the submitted plans, no external alterations are proposed as part of this application, with existing / permitted window openings and terraces utilised. The proposals would therefore have no impact on the host building, the street scene of the historic value of the surrounding Conservation Area, in accordance with the above policies.

Neighbouring Amenity and Environment for Future Occupiers

- 6.11 Policy DM5 of the Local Plan requires that development must 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 to significant adverse impacts. Policy DM5 also requires new development to include a layout and design which take account of potential users of the site.

- 6.12 Given the nature of the proposals, with no external alterations proposed and the fact that the proposals would be formed by subdividing previously permitted flats, the proposals would not have a detrimental impact on neighbouring amenity beyond that of the previous approval on site.
- 6.13 The proposals would be of an appropriate size and would comply with Nationally Described Space Standards (NDSS). Each dwelling would continue to benefit from appropriate levels of daylight and sunlight and light within, as well as outlook from the respective flats. It is also noted that the proposed flats would comply with the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings.
- 6.14 In addition, future occupiers of the proposed flats would have access to the previously approved roof garden and sky lounge providing on site amenity space, as well as the other communal facilities, and it is again highlighted that the site is located in very close proximity to the seafront and with large parks also within walking distance of the site. The proposals would therefore be acceptable in terms of impact on neighbouring properties and would provide an appropriate level of accommodation for future occupiers, in line with the previous approval on site.

Highways and Parking

- 6.15 Policy DM15 of the Local Plan promotes and supports development that prioritises active travel by walking, cycling, non-motorised user routes and public transport, and reduces the proportion of journeys made by car, rebalancing transport provision in favour of sustainable modes.
- 6.16 As detailed above, the proposals would increase occupancy levels within the building / site when compared to the previous approval. The proposal, as previously permitted, would be car free, with appropriate cycle storage to be provided. The proposals would not create any additional capacity demands or trips to and from the site beyond that of the previous approval. Occupants of the additional flats would be provided with a travel voucher to be used for season tickets for bus or rail, drive time for a car club, and/or the purchase of a bike, in line with the previously agreed provision. The proposals are therefore considered to accord with the above policy and would be acceptable in this regard.

Flood Risk Considerations

- 6.17 Policy DM20 of the Local Plan states that the Council will work with relevant bodies to ensure that flood risk in Worthing is managed and reduced. While it is acknowledged that the site is located predominantly in Flood Zone 3, taking into the previous approval under planning reference AWD/1906/22, and given the nature and location of the proposals, to the upper floors of the host building, with no external alterations or alterations to the drainage system proposed, the development would be safe from flooding and would not increase flood risk elsewhere. The situation on site in terms of flood risk has not changed since the previous approval.
- 6.18 The flood risk assessment provided with the previous approval concluded that the development met the sequential and exception tests as set out within the NPPF. Taking the above into account, it is contended that these tests would also be met by the proposed development and overall, would be acceptable in this regard.

Other Matters

Ecology / Biodiversity, Contamination & Fire Safety

- 6.19 Given the nature of the proposals, utilising an existing building with no external alterations, the development would not raise any concerns with regards to these matters.

7. Summary and Conclusion

- 7.1 Overall, the proposed development represents an appropriate form of development, providing additional valuable units of accommodation in this highly sustainable town centre location. The proposal would be acceptable in terms of design and heritage, flood risk, neighbouring amenity and the level of accommodation to be provided. In addition, no concerns would be raised in terms of transport and parking.
- 7.2 As such, the proposals would be in accordance with the relevant Policies of the Worthing Local Plan and the NPPF and therefore, the Local Planning Authority is respectfully requested to grant planning permission accordingly.