LEWIS & CO

PLANNING & HERITAGE STATEMENT

32 MONTAGUE STREET, WORTHING, BN11 3BE

ON BEHALF OF MORETONS INVESTMENTS LTD

Client: MORETONS INVESTMENTS LTD.

Site Location: 32 MONTAGUE STREET, WORTHING, BN11 3BE

Job History:

Version	Date	Author	Checked	Notes
V1	19/09/2026	ZD	SB	
V2	06/10/2026	ZD	SB	
Final	08/10/2026	ZD	SB	

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RTPI
Chartered Town Planners

1.0 INTRODUCTION AND SUMMARY

1.1 This statement is submitted on behalf of Moretons Investments in support of the application for full planning permission relating at 32 Montague Street, Worthing.

1.2 Planning permission is sought for *change of use of upper floors to create 2No. flats, including alterations and insertion of windows*.

1.3 This statement should be read in conjunction with the application forms, and CIL Forms prepared by Lewis & Co Planning and drawings by BPM Architectural Services.

1.4 This statement demonstrates that the proposals meet relevant planning policy requirements with regard to design, quality of accommodation and neighbour impact and that planning permission should be granted.

1.5 Further information is provided within the submitted drawings and supporting documents. This Statement addresses the proposed development, site and surrounding area and compliance with relevant local and national planning policies and guidance. Analysis is provided on:

- The site and area (Section Two)
- Planning history (Section Three)
- Development proposals (Section Four)
- Planning policy context (Section Five)
- Planning Assessment (Section Six)

1.6 This statement demonstrates that:

- The principle of development is acceptable as the proposal represents sustainable development within a sustainable location in the built-up area.

- The proposed works will not result in harm to commercial unit at ground floor level, and there represents a planning fall-back position in relation to the loss of the upper floors;

- The proposed works will not result in material harm to the South Street Conservation Area and the public benefits outweigh other heritage impacts;

- The development provides for a high standard of accommodation and will not cause material harm to neighbouring residents and uses;

- Active travel and sustainable modes of transport will be encouraged by the site's city centre location and access to public transport;

- The proposed development responds to condition 4 applied to reference NOTICE/0010/26 and therefore this condition need not be applied to the application at hand.

2.0 APPLICATION SITE & SURROUNDING AREA

2.1. 32 Montague Street is a two storey plus roof space end of terrace retail unit. The site has a return frontage onto Liverpool Road..



Above: Application site (site edged in red)

2.2. The shop fronts the pedestrianised area of Montague Street, where the retail area takes its access from. There is a rear access to the building (accessed via an existing door in a boundary wall) which the proposed development will utilise as access to the residential unit.

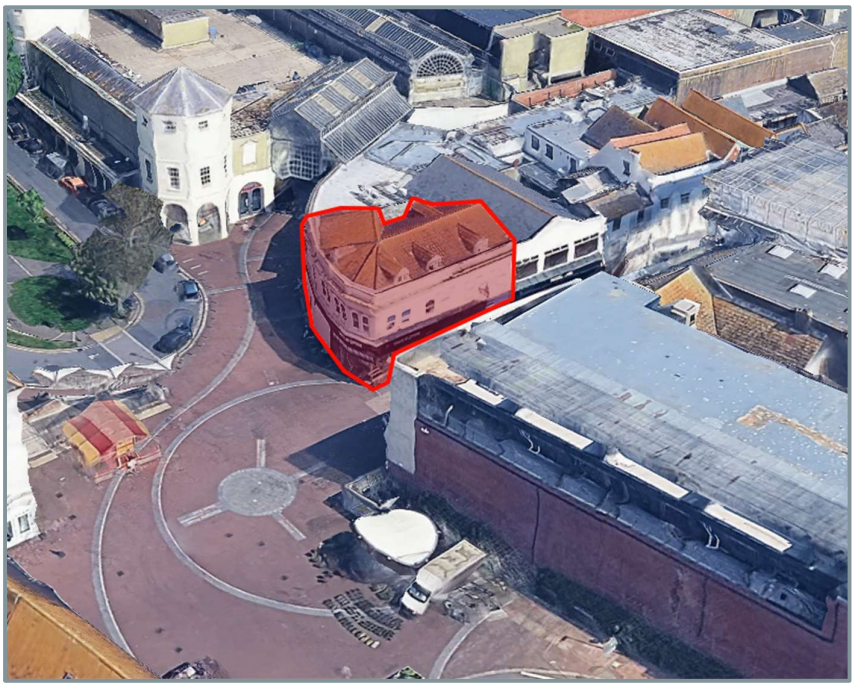


Above: The site

2.3. The shop fronts the pedestrianised area of Montague Street, where the retail area takes access from. There is a side access from the western side of the site, which

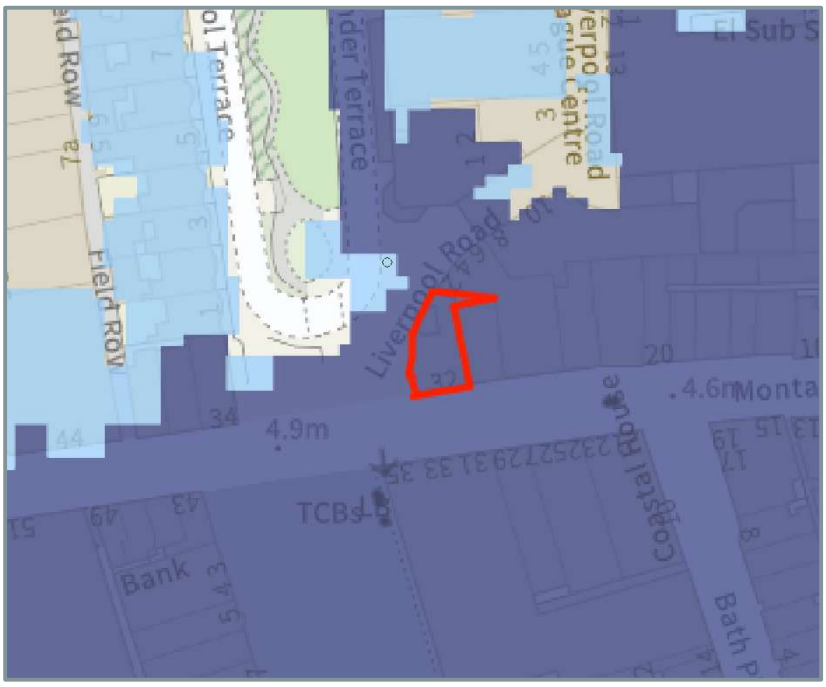
is currently a service access. This is where the proposed development will take access from.

2.4. The location of the site is ideal for residential accommodation. The location is highly sustainable and occupiers would benefit from the excellent sustainable transport connections within the immediate locality.



Above: Aerial Plan (source: Google Maps)

2.5. Review of the policy allocations for the site reveal it is sited within the built-up area boundary, along primary shopping frontage of Worthing Town Centre.



Above: Flood Map for Planning

2.6. The site is located within Flood Zone 3, as indicated in the above map. The application is supported by the submitted Flood Risk Assessment, which advises that the site can be safely occupied.

2.7. The site is located within South Street Conservation Area, but there are no other nearby heritage assets. The Conservation Area map is below.



Above: South Street Conservation Area Map

3.0 PLANNING HISTORY

3.1 Application reference NOTICE/0010/26 was recently approved under prior approval for the change of use of the first and second and third floor to form 1No. residential unit.

3.2 Application reference NOTICE/0010/26 forms a clear fallback position when considering the principle of development at the site.

3.3 The Officer's Report, and the associated consultee responses address several key themes of the proposed development. The development of the upper floors of the site has been assessed in principle terms, flood risk, and transport terms. The development of the site has been deemed acceptable in these terms, and considered a safe and acceptable location for development.

3.4 The previously approved NOTICE/0010/26 included the following condition which requested additional information:

> *"Bin storage areas shall be provided within the curtilage of the site in accordance with details to include collection method to be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development hereby approved. Such approved bin facilities shall be provided on the site prior to commencement of use of the dwellings hereby approved and shall thereafter be retained permanently solely for such purposes."*

3.5 The following information has been submitted as to address these concerns:

- Proposed Basement and Ground Floor Plan – 3231.02

3.6 The submitted floor plans detail the proposed bin storage areas, which are accessed from an area near the entrance of the property.



Above: Proposed Floor Plan (indicating bin storage areas)

3.7 As such, the proposed development includes all information necessary to avoid the application of this condition to the prospective approval.

4.0 PROPOSED DEVELOPMENT

4.1 Planning permission is sought for the *change of use of upper floors to create 2No. flats, including alterations to the ground floor shopfront to create a new entrance, and insertion of rear windows*.



Above: Location Plan

4.2 The proposed conversion will create 1No. 2-bedroom home, and 1No. 1-bedroom home. These dwellings are spacious and well-lit, featuring existing windows, alongside windows proposed under this application.



Above: Proposed side elevation

4.3 The proposed development includes alterations to the roof of the unit to improve light and outlook at top floor level. Internally, the proposal seeks to retain as much of the original plan form as possible, and utilises elements of the existing staircase in the northern part of the building.

4.4 The existing ground floor commercial space would be retained in its current layout, with only a small area lost to create a separate access to the residential flats. The commercial space will be 76.5m^2 and includes a rear kitchen area and WC, which is separated from the main commercial space.

4.5 The flats are arranged around the stair core, taking access from the residential accesses proposed. All units feature multiple windows, and provide all amenities to be expected for pleasant residential occupation.

4.6 Vertical cycle parking will be provided at ground floor level, adjacent to the staircase.



Above: Proposed ground floor plans



Above: Proposed First and Second Floor Plan



Above: Proposed Section Plan

4.7 Full existing and proposed plans by BPM are submitted with this application.

5.0 RELEVANT PLANNING POLICIES

5.1 Relevant planning policy includes:

National Planning Policy Framework (NPPF)

5.2 The revised Framework was published in August 2026, which retains sustainability at its heart. The NPPF also includes a number of relevant policies which support the redevelopment of the site. Of particular relevance are the policies set out in Section 6 of the NPPF, in reference to delivering a sufficient supply of homes.

Worthing Local Plan 2023

5.3 The following policies of the *Worthing Local Plan 2023* are relevant to this application.

5.4 Policy SS1 (Spatial Strategy) seeks to increase housing delivery on small sites and regenerate the town centre, whilst also protecting employment uses and local services.

5.5 Policy SS3 (Town Centre) aims to improve and increase the mix of uses in the Town Centre area "through more efficient use of existing sites".

5.6 Policy DM2 (Density) expects new dwellings to achieve a minimum density of 35 dwellings per hectare (or greater than 100 dwellings per hectare in the town centre) and meet the Nationally Described Space Standards for internal floor areas.

5.7 Policy DM3 (Affordable Housing) only applies to developments of 10 or more units and therefore is not relevant to the application.

5.8 Policy DM5 (Quality of the Built Environment) requires new development to respect, preserve and enhance heritage assets, make a positive contribution to the sense of place and local character of the area and create safe conditions for users of the site through layout and design.

5.9 Policy DM13 (Retail and Town Centre Uses) provides a series of policy objectives for development proposals within the Town Centre, including maintaining a predominance of retail units and supporting the viability and vitality of the town centre. Efficient and effective use of upper floors is encouraged provided that the viability of ground floor uses are not adversely affected.

5.10 Policy DM15 (Sustainable Transport and Active Travel) seeks to manage demand for travel by reducing the need for travel by directing new development to sustainable locations.

5.11 Policy DM23 (Strategic Approach to the Historic Environment) requires the conservation and enhancement of historic areas of the town.

5.12 Policy DM24 (The Historic Environment) states that planning permission will be granted for replacement shopfronts where they are of appropriate design and materials.

6.0 PLANNING, DESIGN, ACCESS AND HERITAGE ASSESSMENT

6.1 The key material planning considerations relevant to this proposal are:

- The Principle of Development
- Design and Visual Impact
- Amenity for future occupants
- Heritage

Principle and Amount

6.2 The site is within the built-up area boundary of Worthing, within a town centre close to a wide variety of existing shops, services and bus routes as well as walking distance from employment opportunities and other facilities including Worthing railway station.

6.3 The proposals are in close compliance with the spatial strategy within the Worthing Local Plan. Policy SS1 of the Local Plan particularly seeks to increase housing delivery on small sites like the application site and Policy SS3 emphasises an increase in the mix of town centre uses (including residential and retail) through "more efficient use of existing sites". The proposals directly align with these principles.

6.4 Policy DM2 (a) (ii) also encourages the delivery of new housing at higher densities within the town centre, setting a minimum target of 100 dwellings per hectare in order to maximise housing delivery close to public transport interchanges and services. The delivery of three additional dwellings in this location is therefore supported by policies.

6.5 Proposals that result in a change of use of upper floors within the Town Centre are supported by Policy DM13 (Retail and Town Centre Uses) (f) provided that the proposed use will not undermine the ground floor/retail uses and the proposed use/s are appropriate for the town centre. The application proposals achieve this by introducing low impact residential uses that will increase overall footfall within the town centre and allow the ground floor unit to be more marketable due to lower rents.

6.6 The conversion of the upper floors of the Class E unit has been approved under reference NOTICE/0010/26. As such, the principle of the change of use has been accepted by the LPA. In this instance, planning permission is required due to the physical alterations which are proposed to improve the quality life of prospective occupiers.

6.7 The principle of development is clearly acceptable, owing to the provision of new dwellings without prejudice to existing commercial floorspace in a sustainable location within the built-up area boundary.

Design and Visual Impact

6.8 The physical interventions to the building are limited to the insertion of new conservation-styled rooflights and a new rear access door (to replace the existing door).

6.9 Buildings along Montague Street are varied in their appearance, character and age. The application site will remain largely similar in appearance and character, due to the modest nature of the proposed alterations.

6.10 The proposed roof lights will not be visible from the immediate street scene, and as such will have no impact on the appearance of the building has perceived from the public realm. Due to the corner nature of the building, there may be views of the windows, but due to perspective, these will be at such a distance to reduce any potential for harm to the character and appearance of the area.

6.11 Due to the very minor nature of these alterations, the proposed development is clearly of an appropriate and sympathetic form. The development proposal clearly aligns with DM5 of the Worthing Local Plan.

Residential Amenity

6.12 The site is located within the town centre and is surrounding by both retail and residential uses. These uses happily coexist side by side.

6.13 The proposal would create two self-contained flats that align with the NDSS and have a good layout of rooms and spaces. The floor plans submitted demonstrate

how the units could accommodate likely furniture items required by a future occupier whilst still retaining circulation space. Further, each habitable room would benefit from acceptable levels of light and outlook.

6.14 With regard to prospective occupiers' amenity, future residents will benefit from a high standard of accommodation. Refuse will be stored internally and taken outside to shared bins when required. The site is located in good proximity to nearby bus routes ensuring convenient access by non-car-borne modes of transport.

6.15 It is acknowledged that the units would not benefit from external amenity space, this is not uncommon for upper floor units, particularly within town centres. The site, however, is located very close to Steyne Gardens and the beach as well as smaller opens spaces in the area (e.g. Liverpool Gardens) which provide excellent opportunities for outdoor recreation for future occupiers.

6.16 Proposed dwellings overlook public streets, and the new dwellings will not cause any overlooking or privacy issues to neighbouring dwellings. The new windows do not provide any views which are unavailable from the building as existing. These windows do not provide views towards any existing windows of nearby residential accommodation.

6.17 This application is supported by the submission of a Noise Impact Assessment, which states that there are appropriate mitigation measures to ensure internal noise levels are appropriate. These have been included as part of the development.

6.18 As such the proposed units are considered to form suitable units of accommodation in accordance with DM5 of the Worthing Local Plan.

Heritage

6.19 The site is located within South Street Conservation Area, which extends to the Pier, and Warwick Street/Ann Street in the East as well as incorporating South Street and parts of Montague Street and Bath Place.

6.20 The Conservation Area Character Appraisal recognises that many traditional/heritage features of the main shopping parade have been lost, but that opportunities exist for these features to be reinstated and the heritage character improved through sensitive enhancements.



Above: South Street Conservation Area Map

6.21 Appraisal seeks to preserve buildings of individual design that reflect the historic scale of the built environment in this area (two to three storeys). The application building is one such property. The Appraisal encourages the creation of features which respect individual buildings and the character and appearance of the street scene.

6.22 The proposed development will have no impact on the Conservation Area by reason that the insertion of conservation-styled rooflights represent a very minor

alterations to the side (facing the public realm) of the building. The proposal provides two units of residential accommodation, and will ensure active occupation of the building, thereby ensuring its ongoing maintenance and contribution towards the Conservation Area.

6.23 The development proposal therefore aligns with both national and local Planning policies, including MD24 of the Worthing Local Plan, which seeks to conserve and enhance heritage assets.

7.0 CONCLUSIONS

7.1 The proposed development is for the *change of use of upper floors to create 2No. flats, including alterations and insertion of windows* at 32 Montague Street, Worthing.

7.2 The proposed development is supported by local planning policy proposal will retain a viable class E unit with a shopfront at ground floor level.

7.3 The proposed dwellings will provide a good layout of rooms and will provide a high standard of residential amenity of occupiers. As only very minor external changes are proposed to the building which will be perceivable from the public realm, the character and appearance of the Conservation Area will be maintained.

7.4 The proposed development is therefore considered acceptable in principle and satisfies all material planning considerations as set out in this statement.

7.5 The proposed development is therefore considered acceptable in principle, satisfies all material planning considerations and previous concerns. In the light of this, the Council are requested to grant planning permission without undue delay.

Lewis and Co Planning
October 2026