

22 April 2026

Attn. Stephen Cantwell
Worthing Borough Council
Worthing Town Hall
Chapel Road
Worthing, West Sussex, BN11 1HA

RH/Let/P2307

Dear Mr Cantwell,

Full Planning Application for the “Change of use of first floor from retail (Use Class E) to nine residential units (Use Class C3) with associated alterations at ground floor to allow access and the addition of first floor windows” at The Montague Centre, Liverpool Road, Worthing, West Sussex.

This application is in addition to previously approved development for the provision of three additional floors above the Montague Centre containing residential units (applications AWDM/1624/22 & AWDM/1194/24 refer).

This Planning Letter has been submitted on behalf of Cayuga 013 LLP in support of the above full planning application at The Montague Centre.

The proposed development forms part of the wider Montague Quarter site, which benefits from planning permission for the provision of residential accommodation above the existing shopping centre. As discussed in further detail later in this Letter, the original scheme was approved under reference AWDM/1624/22 on 6 October 2023 for the:

“Full planning permission for a maximum of three additional floors above the Montague Quarter Shopping centre to provide 42 No. residential units.”

Following the above consent, application reference AWDM/1194/24 was submitted for the:

“Application to Vary Condition 1 (approved plans), condition 23 (Obscure glazing & Balcony screen) and condition 28 (number of units) of application AWDM/1624/22 (and amended by NMA application AWDM/1718/23): Amendment allows for an additional three flats within the 2nd floor and an increase in total units to 45, alteration to ground floor access”.

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The above application received consent on 19 March 2026 for the repurposing of the 2nd-floor storage space within Unit 13 to create 3no. additional residential units, along with rearranging the ground and first floor areas to provide an inherently more efficient and better configured provision of retail accommodation.

Since receiving planning permission for both AWDM/1624/22 and AWDM/1194/24, the existing commercial occupier of the building, TK MAXX, has decided to vacate the building which leaves the ground and partial first floors completely vacant. As set out in the supporting Commercial Statement prepared by Eightfold Property, TK MAXX, have already determined that the existing configuration does not support their operational requirements and will be surrendering their lease upon expiry in December 2026. Their decision reflects broader market trends: oversupply of retail space and preferred demand for better-configured, modern accommodation.

As a result of TK MAXX's departure, the Applicant now seeks to convert the first floor entirely to residential, creating an additional 9no units, and reconfigure the ground floor to deliver a more efficient and better-designed retail unit.

In total, the building would therefore accommodate ground floor commercial and 54no. residential units across first floor and above.

This application is submitted as a stand-alone full planning application relating solely to the change of use of the existing first floor and associated works. It does not seek to amend or consolidate the previously approved permissions under references AWDM/1624/22 and AWDM/1194/24, which remain extant and capable of independent implementation.

The proposed development has been designed so that it can be delivered alongside the previously approved schemes, and the description of development reflects this relationship for clarity in decision-making.

As set out in the supporting Commercial Statement, the proposal is brought forward in the context of changing market conditions and viability considerations since the original planning permission was granted and is intended to support the delivery of the scheme.

The application is supported by the following reports / drawings:

- Application Forms CIL Forms;
- Planning Letter;
- Commercial Statement;
- Architectural Drawings;
- Acoustic Report
- Financial Viability Report Update
- Daylight and Sunlight Assessment
- Drainage Statement
- Energy Statement
- Heritage Impact Assessment
- Transport Technical Note
- Fire Strategy

Site Description and Context

The application site forms part of the Montague Quarter Shopping Centre, located within Worthing town centre, adjacent to Alexander Terrace and close to the seafront.

The site lies within a designated Conservation Area and within the setting of the Grade II listed Liverpool Terrace. The Grade II listed Desert Quartet sculpture is located on the western elevation of the building.

The shopping centre is currently arranged with commercial units at ground and first floor levels, with residential development approved above. The surrounding area is characterised by a mix of commercial, residential and leisure uses typical of a town centre location.

Planning History

The following provides an overview of the relevant planning history pertaining to the site. The below is not comprehensive but sets out the relevant applications since (and including) the original permission (AWDM/1624/22).

Reference AWDM/1624/22. Full planning permission for a maximum of three additional floors above the Montague Quarter Shopping centre to provide 42 No. residential units. Permitted 6 October 2023.

The above application received consent for the construction of three additional storeys above the existing Montague Quarter Shopping Centre, providing 42 residential units. This permission established the principle of residential use on the upper levels of the site, with commercial uses retained below.

Reference AWDM/1663/23. Approval of Details Reserved by Conditions 15 (District Heating) and 25 (Construction Management Plan) of Application AWDM/1624/22. Permitted 28 March 2025.

Reference AWDM/1718/23. Application for a non-material amendment to previously approved AWDM/1624/22. Change of development description to: "Full planning permission for a maximum of three additional floors above the Montague Quarter shopping centre to provide self contained residential units on the upper floors." Permitted 19 February 2024.

Reference AWDM/0084/24. Approval of Details Reserved by Condition 3 (High Standard of Works-Ongoing Liaison) of previously approved application AWDM/1624/22. Permitted 20 March 2025.

Reference AWDM/0104/24. Approval of Details Reserved by Conditions 10 (Sustainable Surface Water Drainage), 11 (Drainage Maintenance) and 13 (Foul Water Drainage) of AWDM/1624/22. Permitted 11 July 2024.

Reference AWD/1194/24. Application to Vary Condition 1 (approved plans), condition 23 (Obscure glazing & Balcony screen) and condition 28 (number of units) of application AWD/1624/22 (and amended by NMA application AWD/1718/23): Amendment allows for an additional three flats within the 2nd floor and an increase in total units to 45, alteration to ground floor access. Permitted 19 March 2026.

The above application comprised a Section 73 application and allowed for the repurposing of the 2nd-floor storage space within Unit 13 to create 3no. additional residential units, along with rearranging the ground and first floor areas to provide an inherently more efficient and better configured provision of retail accommodation. This Section 73 approval increased the total number of residential units to 45.

The approved development therefore currently comprises 45 residential units across three additional storeys above the existing shopping centre, with commercial uses retained at ground and first floor levels.

Reference AWD/0707/25. Enclosure for new UKPN substation and blue badge accessible parking bays (associated with application AWD/1624/22). Awaiting decision.

Reference AWD/0965/25. Approval of details reserved by condition 27 (Safeguard groundwater/ piling) of application AWD/1624/22. Permitted 12 September 2025.

Reference PP-14812774. Non-Material Amendment following Planning Permission AWD/1194/24 to increase the overall height of the approved building by 450mm to accommodate additional plant. Awaiting decision.

Proposed Development

This application seeks full planning permission for the change of use of the remaining commercial part of the existing first floor from Class E to residential (Use Class C3), to provide nine additional flats, together with associated ground floor alterations to facilitate access and the insertion of new first floor windows.

The development is proposed as a stand-alone scheme which would be implemented in addition to, and not in replacement of, the extant permissions for additional floors above the building.

The proposed 9no flats will comprise of 5no. 1-beds and 4no. 2-beds, as set out below. All flats would significantly exceed Nationally Described Space Standards:

- Flat 1 – 2 bed flat – 88.2 sqm
- Flat 2 – 2 bed flat – 89.4 sqm
- Flat 3 – 2 bed flat – 103.6 sqm
- Flat 4 – 1 bed flat – 75.2 sqm
- Flat 5 – 1 bed flat – 70.6 sqm
- Flat 6 – 1 bed flat – 69.5 sqm
- Flat 7 – 2 bed flat – 92.2 sqm
- Flat 8 – 1 bed flat – 85.4 sqm
- Flat 9 – 1 bed flat – 77.1 sqm

The proposed residential units would be accommodated entirely within the existing first floor structure. As such, the proposal would result in no increase in building height, scale or massing beyond that already approved.

In addition to the conversion of the first floor, the ground floor is proposed to be reconfigured to deliver a more efficient and better-designed retail unit.

Limited external alterations are proposed in the form of additional windows to serve the new residential units. These have been carefully positioned to align with the rhythm and proportions of the approved elevations above and are supported by a Heritage Assessment.

The additional nine flats would be fully integrated into the approved residential development and would share the same access arrangements, circulation cores, lift provision and means of escape as the consented scheme. All access arrangements would comply with relevant Building Regulations, including Approved Document M.

Planning Policy Context

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.

In this case, the relevant Development Plan comprises the Worthing Local Plan (2023).

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.

The relevant planning policy documents have been reviewed in detail in preparation of this application but are not explored in detail within this Letter.

Planning Appraisal

This section of the Letter 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
- Highways Assessment
- Acoustic Assessment
- Fire Strategy
- Daylight and Sunlight
- Energy and Sustainability

- Viability / Affordable Housing

Principle of Development

The principle of residential development at the Montague Quarter Shopping Centre is firmly established through the extant planning permissions under references AWDM/1624/22 and AWDM/1194/24. This application does not seek to vary or replace those permissions, but instead introduces a complementary form of development at first floor level.

Residential use on the upper floors of the Montague Quarter has already been found acceptable in principle through the previous permissions, which established residential accommodation above the shopping centre.

The current proposal builds upon this established principle by introducing residential use within the remaining first-floor commercial floorspace through a stand-alone change of use application.

Policy SS1 of the Worthing Local Plan (2023) sets out the Borough's housing requirement for the period 2020–2036, identifying a total requirement of 3,672 dwellings, equating to an annual target of 230 dwellings per annum. The Council's most recent Housing Delivery Test (2023), published in December 2024, confirms that Worthing achieved 107% of its housing requirement and therefore faces no consequences under the Housing Delivery Test. It is however noted that this is now over a year old and therefore likely has changed.

It is noted that, at the time of writing this Letter, Worthing is able to demonstrate a deliverable five-year housing land supply. In this context, paragraph 11(c) of the National Planning Policy Framework applies, which states that development proposals that accord with an up-to-date development plan should be approved without delay. The proposed development accords with this approach by delivering additional residential accommodation in a sustainable and accessible town centre location.

Residential use on the upper floors of the Montague Quarter has already been found acceptable in principle through the previous permissions, which established residential accommodation above the shopping centre. The current proposal builds upon this established principle by extending residential use to the remaining commercial areas at first floor level, providing nine additional residential units within the existing built envelope. Importantly, the proposal would not result in any increase in building height, scale or massing beyond that already approved.

Policy DM13 of the Worthing Local Plan encourages the use of upper floors for alternative uses where this would not undermine the viability of the ground floor commercial units. In this case, the proposal seeks to convert the first floor in its entirety to residential use, while retaining and reconfiguring the ground floor to provide a more efficient and better-designed retail unit. As set out in the supporting Commercial Statement, the departure of the existing anchor tenant, TK MAXX, reflects broader market trends and confirms that the existing configuration is no longer fit for purpose. The reconfiguration of the ground floor is therefore intended to improve long-term commercial viability rather than undermine it.

The proposed loss of first-floor commercial floorspace is considered acceptable in principle, having regard to the evidence submitted which demonstrates that the proposed arrangement would not prejudice the continued commercial operation of the site. The retention of an active commercial frontage at ground floor level ensures compliance with town centre policy objectives, while the introduction of additional residential units makes efficient use of previously underutilised space.

Further to the above, it should be recognised that the redevelopment of the site would make efficient use of brownfield land in the Built-up Area Boundary of Worthing and within the Town Centre. The National Housing Target has recently been increased from 300,000 new homes a year to 370,000 new homes a year. As a result, the NPPF has been heavily updated to try and boost the delivery of housing to try and meet the newest target. One of the ways in which the NPPF seeks to achieve this is by strongly encouraging development on brownfield / previously developed land. Paragraph 165 of the NPPF states that:

"Planning policies and decisions should: c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;"

As such, further development of the land should be strongly encouraged, particularly as the site is situated in such a highly sustainable location. Development of this land is further encouraged by a recent quote from the Government who said, '*brownfield land must continue to be the first port of call for any new development and the default answer when asked to build on brownfield should always be 'yes'*'.

The proposal also seeks to consolidate the previously approved schemes under references AWDM/1624/22 and AWDM/1194/24, and the recently submitted NMA application, with the current application into a single comprehensive planning permission. This approach is intended to provide clarity, avoid the layering of consents, and facilitate the effective delivery of the development as a coherent and viable scheme.

In principle, therefore, the proposed development is fully supported by national and local planning policy, represents a logical and sustainable evolution of the previously approved scheme, and makes a positive contribution to housing delivery within Worthing town centre.

Design, Form, Scale and Appearance

The proposed development has been carefully designed to integrate seamlessly with the previously approved scheme and the existing building.

The proposals have also been prepared to clearly distinguish between works associated with this application and those approved under previous permissions. It is intended that the submitted drawings will identify consented elements separately (for example through greyed or faded annotations), ensuring clarity in the assessment of this stand-alone application.

The principal external alterations relate to the introduction of additional windows at first-floor level to serve the new residential units. These windows are required to provide appropriate levels of natural light and outlook for future occupiers. Their positioning has been carefully considered to align with the established rhythm, proportions and vertical hierarchy of the approved upper-floor fenestration. As illustrated on the proposed elevations (with new openings marked in red), the windows reflect the spacing and alignment of those above, ensuring visual coherence across the façade.

The introduction of additional openings will also enhance the overall appearance of the building by breaking up areas of plain brickwork at first-floor level and creating a more active and articulated façade. The design approach was discussed informally at pre-application stage with Stephen Cantwell, and the resulting elevations respond positively to that dialogue. The accompanying Heritage Impact Assessment further assesses the proposed alterations and confirms that the works would preserve the character and appearance of the Conservation Area and the setting of nearby listed assets.

At ground-floor level, the building will remain in Class E use. Units 12 and 13 are proposed to be reconfigured to provide a single, larger and more efficient commercial unit. This approach responds directly to current market conditions and the evidence set out in the supporting Commercial Statement, providing the opportunity to attract a strong anchor or “blue-chip” occupier rather than subdivided smaller units which may be less viable. The retention of an active commercial frontage ensures continued vitality at street level and maintains the building’s contribution to the town centre.

Internally, the layout of the proposed first-floor residential accommodation is influenced by the existing structural grid and servicing constraints. Nevertheless, the design delivers a mix of one- and two-bedroom flats, contributing to housing choice within the town centre. The additional windows have been strategically positioned to ensure adequate daylight and outlook to habitable rooms, as demonstrated in the accompanying Daylight and Sunlight Assessment.

The nine additional flats will be fully integrated into the approved residential development and will share the same access arrangements. The principal residential entrance will be from the Montague Quarter shopping precinct, with secondary access available via the entrance at the top of the existing ramp. Vertical circulation is provided via two staircases, which serve as protected means of escape in the event of fire, together with a lift located within the main core that is suitable for wheelchair users. Horizontal circulation is provided by communal corridors accessed from the cores, and all entrance doors will achieve minimum clear opening widths in compliance with Approved Document M of the Building Regulations.

Overall, the proposal represents a logical and well-considered evolution of the approved scheme. It introduces no additional built mass, enhances the articulation of the façade, preserves the character of the surrounding Conservation Area, and maintains active commercial use at ground-floor level, thereby fully complying with relevant local and national design policies.

Heritage Assessment

The application site lies within the South Street Conservation Area and within the setting of the Chapel Road Conservation Area. It is also in the setting of several Grade II listed buildings, most notably 1–12 Liverpool Terrace and 22 Montague Street. Of particular significance is the Grade II* listed Desert Quartet sculpture by Dame Elisabeth Frink, which is located on the western elevation of the Montague Quarter and includes the supporting loggia and screen wall within its listing.

In support of this application, a Heritage Impact Assessment (HIA) has been prepared by Donald Insall Associates (January 2026). The HIA provides a detailed assessment of the site's historical development, its heritage context, and the potential impact of the proposed works on designated heritage assets and their settings.

The HIA concludes that:

- The proposed windows are traditionally detailed vertically sliding sash windows, designed to match the architectural language of the existing building.
- The additional openings will reduce areas of inactive blank brickwork and improve façade articulation.
- The works will preserve and modestly enhance the building's contribution to the character and appearance of the South Street Conservation Area.
- There will be no harm to the setting or significance of the Chapel Road Conservation Area.
- The proposals will have no impact on the setting, appreciation, or significance of the Grade II* listed Desert Quartet, as the new openings are located in the northern part of the building and do not affect the sculpture terrace or its neutral sky backdrop.
- There will be no harm to the setting of adjacent Grade II listed buildings, including Liverpool Terrace.

The HIA therefore concludes that the proposals would result in no harm to the significance of any designated heritage asset. In NPPF terms (paragraphs 212–215), the development does not give rise to either substantial or less-than-substantial harm. Rather, the works are considered to be beneficial in townscape terms through improved façade animation.

To conclude, the development is fully compliant with statutory duties and national and local heritage policy. Please refer to the accompanying reports for further information.

Residential Amenity

Policy DM5 of the Worthing Local Plan (2023) requires development to protect the amenity of existing and future occupants, including in respect of privacy, overlooking, outlook, light and general disturbance.

The principal neighbouring properties requiring consideration are those at Alexander Terrace, located to the west of the application site. The impact of residential conversion at upper floors, including the relationship with Alexander Terrace, has already been assessed by the Local Planning Authority under the approved Section 73 application. In that case, concerns were raised by residents regarding potential overlooking from west-facing windows. The Officer's Report concluded that, subject to some glazing restrictions, the overall impact was considered acceptable and compliant with Policy DM5.

It is considered that, where necessary, the same approach can be adopted for the new additional windows. It should however be noted that, as evidenced below, the new windows on the western elevation will be facing a predominantly blank façade of Alexander Terrace and therefore the impact is considered to be minimal.

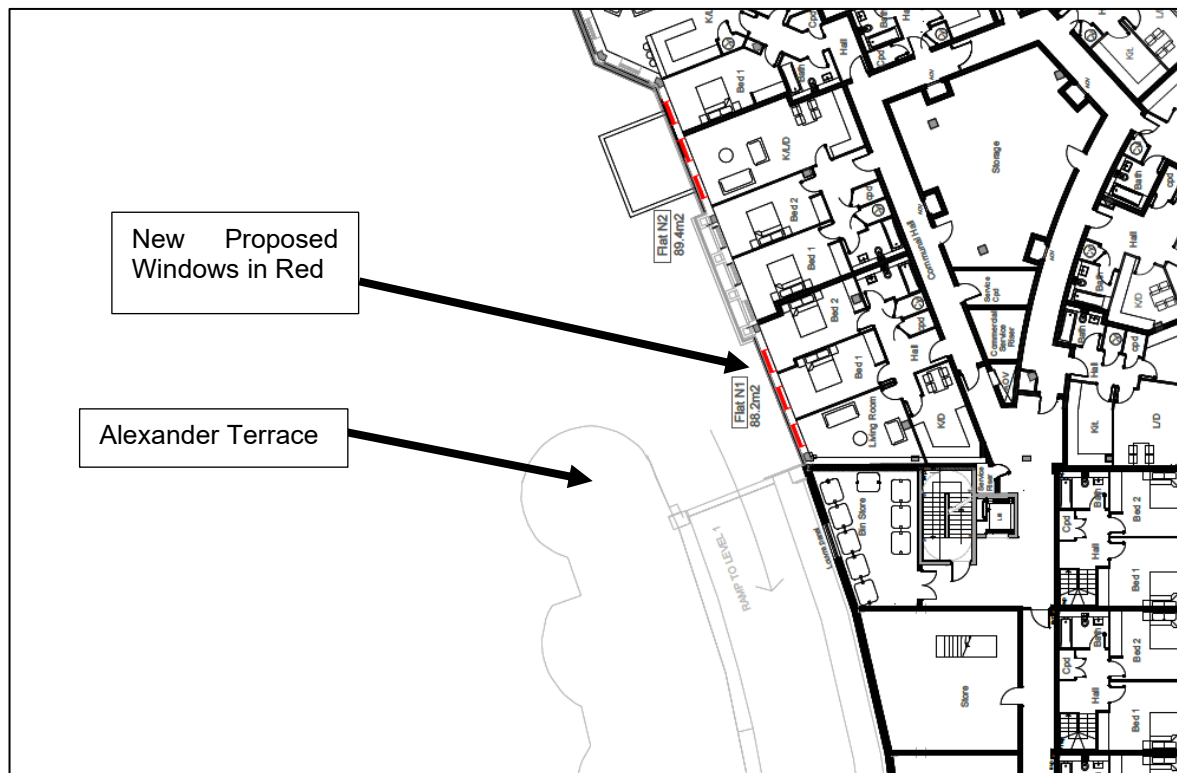


Figure 1 - Proposed Western Elevation Windows



Figure 2 - Google Maps 3D View of Existing Building – Proposed Windows Highlighted in Figure 1 Identified in red



Figure 3 - Blank Facade on Alexander Terrace

The only new openings proposed as part of this application on the western elevation are a limited number of windows at first-floor level, positioned toward the northern end of the building. These windows are located at a point where separation distances and viewing angles significantly reduce any direct overlooking relationship with Alexander Terrace and do not introduce direct, close-range views into principal habitable room windows. The number of windows are considered to be modest in number and proportionate within the façade. Given their position toward the northern end of the building, these windows do not materially alter the established relationship between the Montague Quarter and Alexander Terrace.

It is concluded that the amendments are acceptable and there will be no material harm to neighbouring residential amenity, and the proposal remains compliant with adopted local plan policy.

In addition to the above and regarding proposed residents, the proposed flats will meet the Nationally Described Space Standards. Private amenity space is not proposed for the flats which is considered acceptable in this instance, as per the previous approvals on the site.

In conclusion, the proposed scheme is considered entirely acceptable with regards to residential amenity for both existing and proposed residents.

Flood Risk and Drainage

A Drainage Statement prepared by GTA Civils & Transport Ltd accompanies this application and should be read in full.

The site lies within an established town centre location and the proposals relate solely to the internal conversion of existing first-floor commercial floorspace to residential use. There are no alterations to the building footprint, roof form, or impermeable area.

As confirmed within the accompanying Drainage Statement:

- The proposals do not alter the roof area or site coverage.
- There is no increase in impermeable area.
- The approved surface water drainage strategy (discharged under application AWDM/0104/24) remains unchanged and appropriate.

The Lead Local Flood Authority previously confirmed, in response to the Section 73 application (AWDM/1194/24), that they had no objection. Accordingly, the development will have no impact on surface water runoff or flood risk.

In terms of foul water, the building is served by existing public foul sewers on either side of the site. The approved strategy involves re-use of existing connections to the public sewer network. The additional 9no. units represent a minor increase and as such the small uplift is not anticipated to result in any capacity issues.

To conclude, the development therefore accords with national policy within the NPPF and the Worthing Local Plan (2023). Full technical detail is provided within the accompanying Drainage Statement.

Highways Assessment

A Transport Technical Note has been prepared by Reeves Transport Planning in support of this application and should be read in full.

The proposal seeks to provide 9 additional residential units within the existing building envelope at first-floor level. The site is located within Worthing town centre in a highly sustainable location with excellent access to shops, services, bus routes and Worthing Railway Station (approximately 1km to the north). The development will continue to operate as a car-free scheme, with no general on-site parking provision other than existing disabled spaces.

The Council previously accepted, in determining the Section 73 application (AWDM/1194/24), that additional residential units at the site had already been assessed within the original transport submission and would not give rise to adverse impacts. The current uplift is modest and remains within the scope of those earlier assessments.

Consistent with the previous approvals, the development benefits from inclusion within the approved Car Club scheme, secured via the S106 agreement, with membership offered to each household. Cycle parking provision approved under the extant consent included at least 25 spaces when the scheme comprised 49 units. It is considered that the existing cycle storage provision is capable of accommodating the modest additional demand generated by the proposed 9 units.

To conclude, the proposed additional 9 flats would result in minimal trip generation, would not materially impact highway capacity or safety, and would continue to operate as a highly sustainable, car-free development.

The proposal therefore accords with the Worthing Local Plan (2023) and relevant guidance within the NPPF. Full assessment details are provided within the accompanying Transport Technical Note.

Acoustic Assessment

This application is supported by a Noise Assessment update, prepared by 7th Wave Acoustics.

The report clarifies that it should be read in conjunction with the previously submitted acoustic reports by 7th Wave Acoustics and specifically considers the noise assessment in respect of the proposed additional nine residential units only and should not be taken as a reassessment of the wider development.

In summary, the assessment demonstrates that:

"..with windows closed and assuming a minimum glazing performance of 30 dB Rw, the BS 8233:2014 internal ambient noise criteria can be achieved within the proposed residential units.

Typical night-time L_{Amax,F} noise levels are predicted to exceed the WHO guideline value of 42 dB internally at bedrooms on the north and east façades if standard glazing is adopted. Enhanced glazing, as outlined in Section 7, is therefore required to ensure the WHO night-time criterion can be achieved.

To protect the future residents from the potential impact from the internal transfer of noise from any non-domestic activities at the ground floor of the development, it is recommended that a review and an assessment of the proposed floor/ceiling construction is undertaken to ensure an appropriate level of sound insulation is provided between the spaces. It could be conditioned as part of any planning approval, to request a scheme of design to demonstrate a suitable level of sound insulation can be achieved.

External plant rating noise limits have been derived based on the established background (L_{A90,T}) sound levels to inform the final selection and design of any fixed plant associated with the development.

Subject to implementation of the glazing and sound insulation measures outlined in this report, the proposed development is considered acceptable in acoustic terms."

To conclude, it is considered that pursuant to suitable glazing and mitigation measures, the new 9no. residential units would be acceptable in terms of possible noise nuisance. The recommended mitigation measures can be secured by condition.

Fire Strategy

The application is supported by a Fire Safety Report which has been prepared by B-First Fire Safety.

The Report sets out the package of measures that propose a high quality and practical solution to fire safety throughout the proposed development. The finalised fire safety strategy for the overall development will be updated to comply with the Building Regulations and enable the building, in the necessary parts, to also comply with the Regulatory Reform (Fire Safety) Order 2005.

Please refer to the accompanying Report for further information.

Daylight and Sunlight

An updated Daylight and Sunlight Report has been prepared in support of this application, by GIA. In conclusion the Report states:

"In conclusion, the results of the assessments have shown very good levels of daylight and sunlight in the vast majority of the proposed flats. In the very few areas where lower levels of light are available, the design has sought to prioritise natural light in living spaces, and has provided generous layouts. As a result, all residents will be able to enjoy excellent or acceptable levels of light."

Please refer to the accompanying Report in full for further information.

Energy and Sustainability

This application is supported by an Energy Statement including Overheating Risk Report which has been prepared by PJR.

The accompanying Report confirms that Fabric insulation will be improved by fitting additional insulation, and new high-performance double-glazed windows. There will also be new flats built above, hence significantly reducing heat loss, energy use, and carbon emissions further. Air source heat pumps are to be installed to achieve the policy target of 10% reduction in carbon emissions.

As confirmed within the Report, SAP calculations have been calculated on the total floor areas, external wall areas, windows etc. for all the proposed dwellings which are then divided by 9 to provide the most accurate/representative base for the energy assessment, with samples contained within the report.

In terms of overheating, the Report confirms that the proposed units all pass the study and can confirm that compliance is achieved with regards to the Approved Document Part O requirements.

Please refer to the accompanying Report for further information.

Viability / Affordable Housing

This application is supported by a Financial Viability Report update which has been prepared by Oakley Property.

As set out in the attached, Oakley prepared the previous Financial Viability Reports for the previous applications, dated 27 April 2023 and 31 March 2025, and have prepared the subsequent update in support of this 9no. unit scheme.

It is important to note that the Report update does not seek to carry out a comprehensive review of the original development appraisal, and seeks to rely upon the construction costs and sales values as adopted in the 2023 report. This approach has been agreed in order to save the Applicant extensive costs in respect of undertaking a major revaluation of the whole scheme, which would seem unnecessary at this stage.

It is widely agreed that build costs have gone up and sale prices down since the original report which makes viability even more challenging. Even with adopting the previous 2023 figures, the accompanying Report update concludes that the 9no. additional flats still demonstrate a significant viability gap and is therefore unable to deliver any surplus over the Benchmark Land Value (BLV) in the form of an affordable housing pot.

As such, affordable housing is not able to be accommodated on this site in relation to the 9no. additional units, in the form of either on site or off site provision.

Conclusion

This application seeks full planning permission for the conversion of the remaining and vacant, first-floor commercial floorspace at the Montague Quarter to provide 9no. additional residential units.

The application is presented as a stand-alone proposal for change of use and associated alterations, which would be implemented alongside the previously approved developments under references AWDM/1624/22 and AWDM/1194/24.

The principle of residential development at the site has already been firmly established through extant planning permissions. The proposal represents a logical and sustainable evolution of the approved scheme, responding positively to changing market conditions following the confirmed departure of the existing anchor tenant. The reconfiguration of the ground floor to provide a more efficient and commercially attractive retail unit will help safeguard the long-term vitality and viability of this town centre location, whilst making effective use of underutilised upper-floor space.

Importantly, the development is contained entirely within the existing building envelope and introduces no additional height, scale or massing beyond that already approved. External alterations are limited and sensitively designed, preserving and modestly enhancing the character and appearance of the Conservation Area, with no harm to the setting or significance of nearby listed buildings, including the Grade II* listed Desert Quartet sculpture.

The additional residential units will significantly exceed Nationally Described Space Standards, provide high-quality accommodation with good levels of daylight and outlook, and integrate seamlessly into the approved residential development. Technical assessments accompanying the application confirm that there are no adverse impacts in respect of highways, drainage, flood risk, residential amenity, daylight and sunlight, acoustics, fire safety, or sustainability. The proposal remains a highly sustainable, car-free development in a town centre location with excellent access to services and public transport.

Overall, the scheme will deliver a total of 54no. residential units in Worthing town centre, contributing to the Borough's housing supply in a sustainable location and supporting regeneration objectives. The proposals make efficient use of brownfield land, contributing to the Government's updated housing figures. The submitted viability update demonstrates that, even with the inclusion of the additional nine units, the scheme continues to face a viability gap and is unable to support affordable housing provision, consistent with the Council's previous approach to this site.

Overall, the proposal accords with the Worthing Local Plan (2023), the National Planning Policy Framework, and all other relevant material considerations. It represents sustainable development which accords with the Development Plan when read as a whole and should therefore be approved without delay. We respectfully request that the Local Planning Authority grants full planning permission for the proposed development.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Chris Barker MATP MRTPI

Managing Director