



**LEWIS & CO**

## PLANNING STATEMENT

39 BRIGHTON ROAD, WORTHING, BN11 3EF

ON BEHALF OF KTLX LTD



Client: KTLX LTD

Site Location: 39 BRIGHTON ROAD, WORTHING, BN11 3EF

Job History:

| Version | Date       | Author                 | Checked   | Notes                   |
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## APPENDICES

APPENDIX A – PHOTO STUDY OF VIEWS TOWARDS SITE FROM SURROUNDING AREA





## 1.0 INTRODUCTION AND SUMMARY

- 1.1 This Statement has been prepared on behalf of KTLX Ltd (the applicant) in support of an application for full planning permission at 39 Brighton Road, Worthing.
- 1.2 Planning permission is sought for a *rear dormer extension, removal of rear chimney and rooflights to front roofslope*.
- 1.3 The works proposed under this application would allow for the creation of a second bedroom to the existing 2<sup>nd</sup> floor flat.
- 1.4 The application follows planning consent for other works to the property including urgent works to repair the fabric of the building, retrofit the building to modern standards and provide long-term viable uses of the building that address local needs and reflect the character of the area.
- 1.5 This statement should be read in conjunction with the accompanying application documents and drawings prepared by BPM:
  - Application forms
  - CIL Form 1: Additional Information
  - Existing Floor Plans and Site Location Plan (Drawing Number 3094.01)
  - Existing Elevations and Sectional Elevation (Drawing Number 3094.02)
  - Proposed Floor Plans (Drawing Number 3094.03)
  - Proposed Elevations and Sectional Elevation (Drawing Number 3094.04)
- 1.6 This Statement will demonstrate that planning permission should be granted for the proposed works. It provides an analysis of:
  - The site and surrounding context
  - Relevant planning history
  - The proposed development
  - Relevant planning policies; and

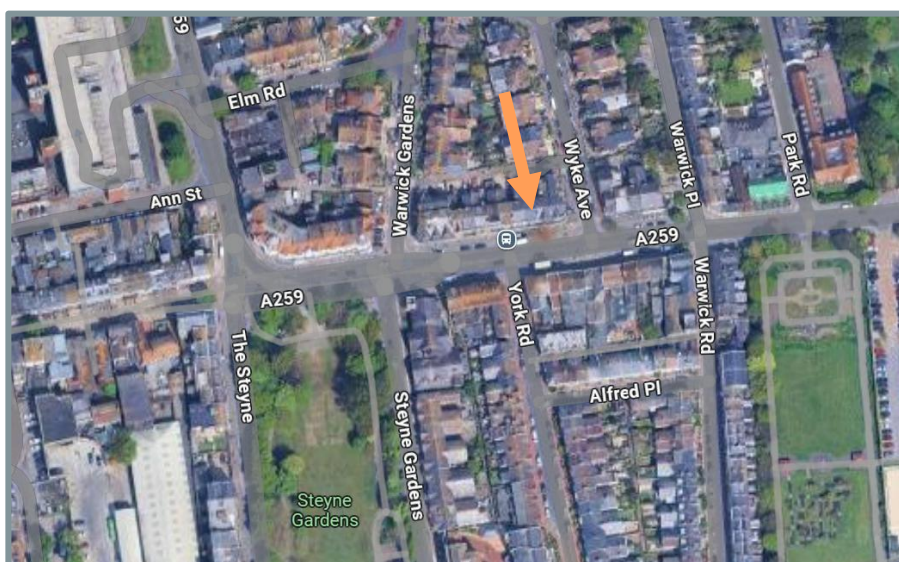


- A planning assessment setting out compliance with relevant planning policies in relation to the principle of development and all other material considerations



## 2.0 APPLICATION SITE & SURROUNDING AREA

- 2.1. The application site consists of the entire building at 39 Brighton Road (A259), within central Worthing. The site forms part of the town centre and is close to Warwick Street, Steyne Gardens and the seafront.

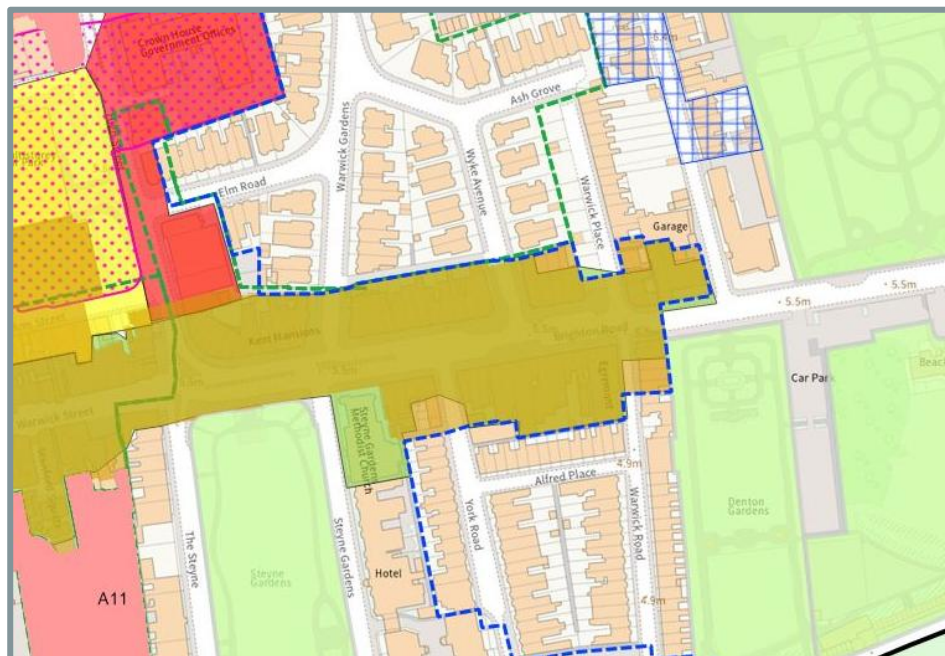


*Site and surrounding context*

- 2.2. The building consists of a ground floor Use Class E commercial unit with residential flats at first floor and second floor levels which can be separately accessed from 39 Brighton Road (A259). There is a rear access and parking area to the rear of the site, from an access road running between Wyke Avenue and Warwick Gardens.
- 2.3. Planning consent granted under **AWDM/0103/26** included the partial conversion of the rear ground floor to form a ground and first floor maisonette which would be a Use Class C4 house in multiple occupation. Works will commence to implement this permission during the course of this application.
- 2.4. The ground floor unit is currently vacant having previously been in use as a hairdressing salon (Use Class E), and the unit was previously also used as a carpet shop. The latest permission (**AWDM/0103/26**) included minor works to the existing shopfront to better reflect the historic character of the area.



- 2.5. Areas of the building have deteriorated under previous ownership and the applicants have reported the building as a dangerous structure, which has been confirmed by the local authority building control team. The existing roof timbers and slates have perished and require replacement. Works are underway to make the structure safe but some of these measures are temporary and further remedial works (proposed under this application) are necessary to ensure that the building does not deteriorate further, including reconstruction of the existing roof.
- 2.6. Planning permission is therefore sought for the works proposed to allow these to be undertaken as part of the wider works to repair the building's roof, if acceptable to the local planning authority.
- 2.7. Planning permission (AWDM/1490/17) was granted in 2017 for change of use from Use Class A1 (retail shop) to a tattoo studio use of the unit (then sui generis) but Google Streetview images demonstrate that this was never implemented. Google Street View contains evidence corroborating this use across 17 dates, with the property either vacant or in use as a hairdresser (then Use Class A1) or flooring/carpet store (then Use Class A1).



*Local Plan Policy Map extract*



- 2.8. The site lies within the Town Centre policy area (dashed blue line above) and within an area of secondary retail frontage (golden area above). The property is also within the Warwick Street/Brighton Road Town Centre Character Area where the Local Plan defines the functions to be “*café cultural, food and beverage, specialist/niche/independent retailing*”.
- 2.9. The location within Worthing town centre is also a sustainable location for residential uses given the proximity of the site to both day-to-day shops and services, as well as the seafront and other leisure and recreational opportunities.
- 2.10. The site is located within the Steyne Gardens Conservation Area and is a locally listed building (alongside adjoining properties). Properties to the rear of the site fall within the Warwick Gardens Conservation Area. The nearest listed building is 22-24 Brighton Road (Grade II, List Entry 1250105).



*Flood Map for Planning extract*

- 2.11. The site is located within Flood Zone 1 (lowest risk of fluvial flooding) and at low risk of surface water flooding. No flood risk concerns were raised by relevant consultees on earlier planning applications.



### 3.0 PLANNING HISTORY

3.1 The application site has been subject to a number of recent applications.

AWDM/0103/26

3.2 The application was approved in July 2026, and allows the ground and first floor maisonette approved under **NOTICE/0009/25** to be used as a Use Class C4 house in multiple occupation, with a revised internal layout, alongside works to alter the shopfront, replace existing windows and the existing roof structure and other alterations including soundproofing works and energy performance improvements.



Approved Elevations – AWDM/0103/26

3.3 The works proposed included changes to the internal layout of the second floor flat (which do not require planning permission in their own right). As part of the consent, the local planning authority have asked for evidence of appropriate sound-proofing between floors to demonstrate that the development achieves “a minimum airborne sound insulation value of 45dB (DnTw + Ctr dB) and a minimum impact sound insulation value of 62 (LnTw dB)”.



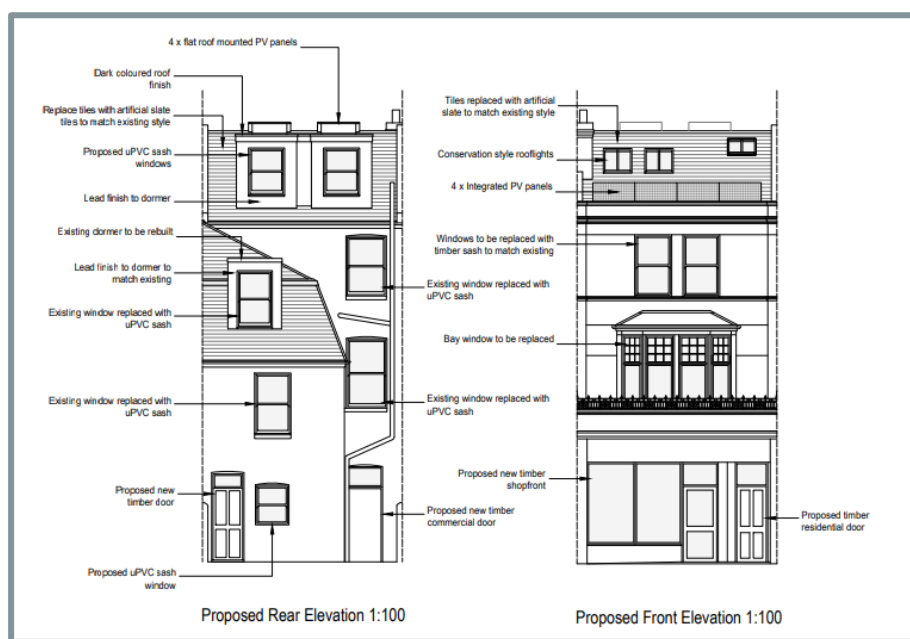
## NOTICE/0009/25

- 3.4 In July 2025, the Council granted prior approval for the change of use of the rear section of the ground floor commercial unit to Use Class C3 residential. This area of the existing commercial unit was proposed to be amalgamated with the existing residential flat above.

## AWDM/1119/25

- 3.5 Planning permission was sought (following the prior approval application referenced above) for the following development:

*“Change of use of rear ground floor to residential and conversion of two flats to form two small houses in multiple occupation (Use Class C4) facilitated by rear dormer roof extension, front rooflights, solar PV panels, shopfront alteration and other associated alterations (39 and 39A Brighton Road).”*



*Proposed Elevations - AWDM/1119/25*

- 3.6 The proposals sought to improve the overall energy efficiency and thermal performance of the building, alongside maximising the use of the building and undertaking necessary repairs to the building fabric. However, the application was refused for two reasons:



*"1. The proposed development including rear dormer, PV panels, internal dividing wall and replacement windows would, by reason of their scale, form, and detailed design, be detrimental to the visual amenities of the site and would detract from the character and appearance of the conservation area. As such the proposed development would be contrary to policies DM5 and DM24 of the Worthing Local Plan, and the relevant paragraphs of the National Planning Policy Framework.*

*02. The provision of 10 single bedrooms within two HMOs is considered to be an overdevelopment of the site which by reason of lack of outlook, privacy, head height, outdoor amenity space and noise and disturbance would have an adverse impact on the residential amenity of future occupiers contrary to policies DM2 and DM5 of the Worthing Local Plan (2023) and the NPPF."*

- 3.7 The current application proposal seeks to directly address the concerns raised around works proposed to the roof within the first reason for refusal, as set out below.

#### **AWDM/1762/23**

- 3.8 Planning permission was granted in 2024 for remedial works to the front elevation of the first floor flat under application reference **AWDM/1762/23**.
- 3.9 The officer report confirmed that the structure was damaged and a dangerous structure requiring immediate repair. The works included replacement first floor timber-framed windows.

#### **AWDM/1490/17**

- 3.10 Planning permission was granted in December 2017 for a change of use of the ground floor commercial unit to tattoo studio, but never implemented.



## 4.0 PROPOSED DEVELOPMENT

4.1 As described above, the development proposals consist of:

- front rooflights (3no)
- rear roof dormer
- alterations to the internal layout of the second floor flat
- removal of a redundant rear chimney stack to the north facing wall

4.2 The front rooflights proposed would be conservation style rooflights, with two serving the new third floor bedroom and one providing natural light to the stairwell. The rooflights would be obscured from public viewpoints at ground level by the existing parapet, except from longer views towards the site from parts of York Road to the south of the application site.



*Proposed Front Elevation*

4.3 To the rear of the property, a new rear roof dormer is proposed. The dormer is designed to match the existing dormer windows on the roof of the outrigger but would be double width to provide a more usable area of internal floorspace. Sash windows are proposed to match others within the rear façade. The new windows proposed would be modest in size to reflect traditional hierarchies.

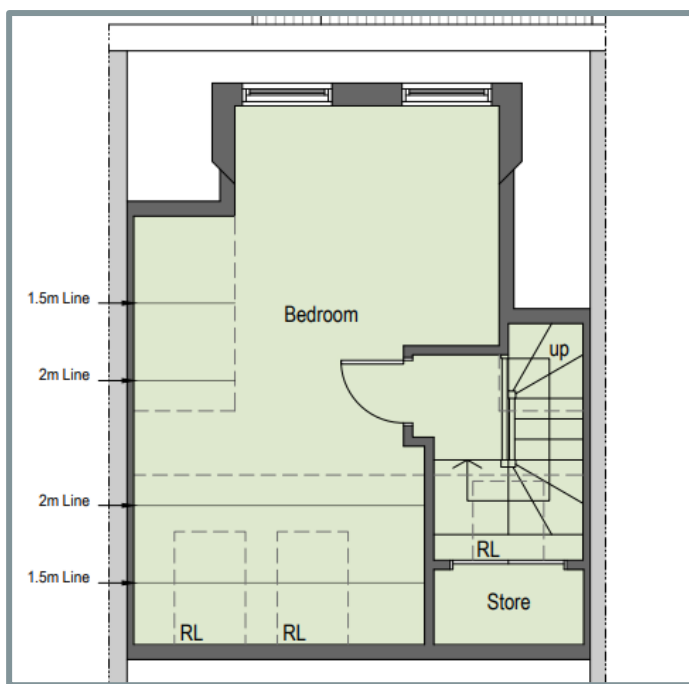


*Proposed Rear Elevation*

- 4.4 The application is part-retrospective as the rear chimney stack has required immediate removal for building safety reasons. The application includes a report from Structural Engineers (Mitchenson Macken) highlighting significant deterioration and leaning to the chimney stack and advising that the extent of deterioration meant that localised repairs would not be successful and recommended that the chimney stack should be removed to below roof level. Photos within the report show the extent of deterioration.
- 4.5 Planning permission has already been granted for wider remedial works, including the replacement of the existing roof structure as part of **AWDM/0103/26**. The existing roof is no longer watertight and has become damaged beyond repair as a result, and the structural engineers report highlights corrosion of steel beams from water entering via the damaged chimney stack.
- 4.6 The works no longer include proposed solar PVs proposed under **AWDM/1119/25** and the proposed rear dormer has been reduced in size. The works proposed are therefore more sympathetic to the existing roofscape and Conservation Areas. The proposed rear dormer would not be visible from the front of the property.



- 4.7 The internal layout of the second floor flat will be subject to minor changes following feedback from officers under previous applications. A revised shower room position is proposed, allowing this to be stacked over a first floor shower room. Enhanced soundproofing between the second floor unit and the residential unit below is already secured through earlier consents.



*Second Floor Flat – Proposed Layout*



## 5.0 RELEVANT PLANNING POLICIES

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

5.2 Policy DM1: Housing Mix supports the principle of converting existing properties to HMO uses and states:

*“f) When considering proposals for the conversion of dwellings into smaller units of self-contained accommodation, the proposal must provide a high standard of accommodation that complies with internal space standards and requirements for private outdoor space. In addition, the Council will consider:*

- i) the impact on the mix of dwellings locally*
- ii) the impact on the character of the area*
- iii) the impact on the amenity of adjoining dwellings*
- iv) the quality of the accommodation. Applications for the change of use to a C4 use, a mixed C3/C4 use or to a sui generis HMO use should also demonstrate that the communal living space and cooking and bathroom facilities are provided appropriate in size to the expected number of occupants.”*

5.3 Policy DM2 (Density) places an expectation on new dwelling proposals to meet the Nationally Described Space Standards for internal floorspace.

5.4 Policy DM5 (Quality of the Built Environment) sets out the Council’s strategic approach to design quality.

5.5 Policy DM15 (Sustainable Transport and Travel) promotes developments that prioritise active travel and reduce the proportion of journeys made by private car. The policy seeks to achieve this by directing development to sustainable locations with good access to schools, shops, jobs and other key services.

5.6 Policy DM23 (Strategic Approach to the Historic Environment) seeks to conserve and enhance the historic environment and character of Worthing. The



policy seeks to *“take opportunities to seek improvements to listed buildings and buildings within Conservation Areas when their condition has deteriorated”*.

- 5.7 Policy DM24 (The Historic Environment) sets out the policy approach to designated heritage assets, seeking high quality development that respects the context and delivering a strong sense of place.



## 6.0 PLANNING ASSESSMENT

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

- The Principle of Development
- Design and Visual Impact
- Standard of Accommodation
- Impact on Neighbouring Amenity
- Heritage
- Transport and Active Travel
- Flood Risk and Drainage
- Sustainability

6.2 These considerations are dealt with in turn below.

### **Principle of Development**

6.3 As set out within Section Three, the Council have granted permission for a number of works to refurbish and repair the fabric of the building and provide a mix of commercial and residential uses. The works proposed under this application relate to the existing second floor flat and roof space only.

6.4 The proposals would enlarge the existing one-bedroom second floor flat through the creation of an additional bedroom in the roofspace. Front rooflights are provided within the third-floor accommodation for natural daylighting and ventilation, and a rear dormer is proposed to provide an improved area of usable floorspace within the third floor.

6.5 The Council's latest Strategic Housing Market Assessment<sup>1</sup> (July 2025) confirms that 1-bedroom units only make up 5% of the town's wider housing needs. The works therefore help to address a more significant need (two-bedroom dwellings account for 40% of market housing needs).

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<sup>1</sup> Adur and Worthing Strategic Housing Market Assessment, paragraph 8.38



- 6.6 The delivery of improved residential accommodation in this location is supported by both local and national policies. The proposals will make efficient use of the existing building through the conversion of an ancillary loft space to habitable residential accommodation in full alignment with the objectives of Policy DM2 (Density) of the Local Plan and paragraph 129 of the NPPF.
- 6.7 Policy DM23 (Strategic Approach to the Historic Environment) also seeks to *“take opportunities to seek improvements to listed buildings and buildings within Conservation Areas when their condition has deteriorated”*. Given the existing condition of the building and its location within a locally-listed terrace and Conservation Area there is clear policy support for the repair and enhancement of the building. The works will also allow the building to be fully occupied against and bring the entire building back into active uses that will support its long-term active use and maintenance and management.
- 6.8 The works will generate local economic activity during the construction process, in accordance with the economic dimension of sustainable development. The repairs to the building will provide improvements to the wider built environment and Conservation Area and will support active and viable uses – ensuring the optimum viable use and long-term maintenance of the building.
- 6.9 Policy DM23 (Strategic Approach to the Historic Environment) of the Worthing Local Plan (as well as relevant national planning policies) strongly support proposals that seek improvements to buildings within Conservation Areas when their condition has deteriorated. The applicants recently purchased the building and are seeking to deliver a comprehensive set of improvements and repairs that will allow the building to return to active use once more.
- 6.10 On this basis, the proposed development is acceptable in principle and supported by local and national planning policies. Other material considerations are addressed in detail below.

### **Design and Visual Impact**

- 6.11 The works proposed will support and sensitive refurbishment and modernisation of the building as a whole - alongside previously approved proposals.



- 6.12 The works will provide a net visual improvement to the building and have been sensitively designed to maintain the existing features of the building that contribute to the character and appearance of the wider area, including the Conservation Areas.
- 6.13 The roof is largely concealed from public views by surrounding buildings and trees, as well as the front parapet on the building that obscures views of the roof from the majority of vantage points to the front of the building. A full photo study is provided at Appendix A but the limited vantage points from which any views of the roof are possible are mapped below:

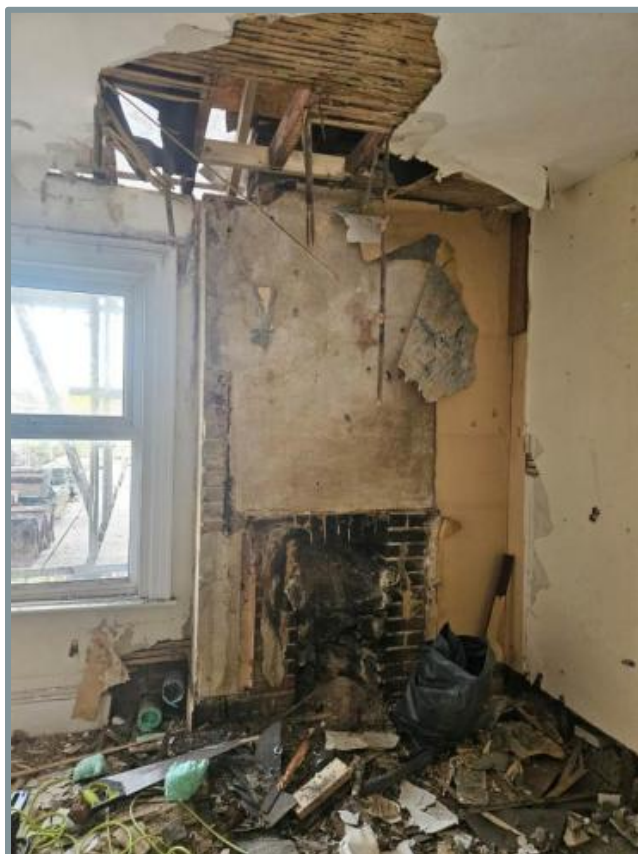


*Map showing approximate locations from which partial views of existing roof are possible*

- 6.14 Even in those limited locations, the visibility of the roof is severely restricted and only minor elements of the roof are visible in the majority of cases – except for some specific longer views from York Road.
- 6.15 As set out in the accompanying Structural Engineers report, the existing building is in a poor state of repair and is no longer watertight. The rear chimney stack



has been urgently removed due to leaning and structural damage that is not capable of repair. Photos within the Structural Engineers report demonstrate the extent of damage at second floor and roof level.



*Internal condition at second floor level*

- 6.16 The removal of the chimney has therefore already been undertaken for safety reasons. Retrospective planning permission is sought for the permanent removal of the chimney as part of the works. The building would retain the existing front chimney, which forms part of a more uniform pattern within the roofscape. In contrast the majority of buildings within the terrace no longer feature rear chimney breasts, including the adjoining neighbours at 33, 35 and 37 Brighton Road. Planning permission was granted for the removal of the rear chimney at 29 Brighton Road in recent years under application reference **AWDM/0192/22**.
- 6.17 At roof level the building requires major remedial works, including the replacement of the existing roof approved under **AWDM/0103/26**. Structural works to rebuild the front bay and balcony following partial collapse were also subject to an earlier application (see **AWDM/1762/23**).



- 6.18 As the main roof already requires substantial repair and replacement, the works proposed would not have any additional impact on the historic fabric of the building. The works proposed would introduce new features – in the form of three rooflights and a rear dormer – as part of the wider works to replace the existing roof with new timbers and slate tiles.
- 6.19 The proposed development has therefore been designed to renew the building itself while retaining its existing character, which forms part of the historic character of the area.
- 6.20 Replacements of existing sash windows and repairs to the roof and parapet have already been approved under earlier applications. Matching materials have been chosen for both approved and proposed elements to ensure a comprehensive refurbishment of the building.
- 6.21 Under earlier proposals, the applicants also sought to integrate renewable energy features (solar PVs). These works are no longer proposed, significantly reducing the visual impact of the works as a whole. The proposals still seek to provide an overall improvement to the building's energy performance whilst maintaining the historic appearance of the building.



*View of application site from footway immediately opposite – showing roofslope obscured by parapet*

- 6.22 Alterations to the rear of the building are mostly obscured from public viewpoints by the existing built environment, including the four-storey building



on the corner of Brighton Road and Wyke Avenue, and the two-storey semi-detached homes on Wyke Avenue. The only view of the building from within Wyke Avenue is a passing view along the rear access road where parts of the rear roofslope and rear outrigger are visible.

- 6.23 Similar works were approved to the more prominent corner building at 45-47 Brighton Road, including mansard roof extension, velux rooflights and new dormer windows under application reference **08/0237/FULL**. These works are now in situ and form part of the front façade of the building on Wyke Avenue, including a pair of double dormer windows at first and third floor levels. This building forms part of the immediate context for any views towards the rear of the application site from the western/Wyke Avenue. The proposed roof dormer is discretely located in comparison and the proposed design will be reflective of this wider character.
- 6.24 The proposed dormer is also designed to reflect other dormers within the roof of the rear outrigger, utilising box sash windows in a white wood grain effect to match these existing and approved features that will form the immediate context.
- 6.25 On this basis, the works are appropriately designed and detailed – including matching the materiality of other dormer windows within the immediate context – and will have only a very minor visual impact given the discrete location of the works proposed and very limited visibility of the third floor/roof of the building. The requirements of Policy DM5 (Quality of the Built Environment) are therefore met in full.

### **Standard of Accommodation**

- 6.26 The second floor and third floor residential unit is proposed to be arranged as a two-bedroom dwelling (Use Class C3).
- 6.27 In addition to creating the third floor/loft bedroom, the proposals also include alterations to the internal layout at second floor level to replace an existing narrow kitchen with a larger kitchen and dining room, relocating the existing



bedroom and providing a modern shower room (situated above a first-floor shower room in response to the Council's preference on earlier applications).

- 6.28 The proposed dwelling will significantly exceed national space standards for a two-bedroom, two-storey dwelling, at 86.1m<sup>2</sup> in floorspace. The new bedroom created at third floor level will exceed 11.5m<sup>2</sup> of usable floorspace (over 1.5m headroom), meeting criterion 10.d of the nationally described space standard technical requirements.
- 6.29 All habitable rooms benefit from excellent natural light and would provide a good standard of accommodation. Non-habitable bathrooms have been located within the centre of the building where natural light is less achievable.
- 6.30 Appropriate provision of refuse and recycling storage facilities has been identified at the rear of the site – as previously approved, with a dedicated bin store for each unit within the building. Screening is proposed to restrict the visual impact of those features.
- 6.31 All relevant technical requirements and guidance have therefore been met and the works will improve the existing residential dwelling as part of a wider refurbishment of the entire property. The proposals therefore comply with Policy DM2 (Density) of the Local Plan, insofar as these relate to the development proposed.

### **Neighbouring Amenity**

- 6.32 The proposals would only increase the second floor flat by a single bedroom and therefore the occupancy of the property would remain comparable to the existing situation.
- 6.33 The rear dormer extension is located at the rear of the property where the curtilage of neighbouring properties is limited to hard surfacing generally used for access and off-street parking and open to the street/access track. These areas are therefore not private in character or sensitive to additional overlooking – and additional passive surveillance is likely to be beneficial to the character and feel of this space.



- 6.34 The only rear garden areas located to the rear of 39 Brighton Road relate to properties on Warwick Gardens and Wyke Avenue. There is already an established level of overlooking between these gardens and surrounding properties given the density of development and town centre locations. The proposals would therefore not introduce any materially harmful impacts in terms of privacy and overlooking. Even the closest point the proposed dormer would be approximately 20m from these garden areas, providing a comfortable separation distance.
- 6.35 Works proposed would be subject to relevant building regulation requirements relating to sound insulation and noise transmission.
- 6.36 As such, no material adverse impacts relating to neighbouring amenity would arise as a consequence of the development.

### **Heritage**

- 6.37 The site is located within the Steyne Gardens Conservation Area (and close to the Warwick Gardens Conservation Area to the rear of the property) and forms part of a locally-listed group of buildings.
- 6.38 The rear dormer is designed to match the other dormer windows at the rear of the property in style and character, while providing a pair of sash windows and achieving additional usable floorspace within the second-floor bedroom. The sash windows proposed are smaller units than the windows within the main façade below, reflecting the traditional hierarchy of the building. The materials proposed will match those already approved for the rear elevation under AWDM/0103/26.
- 6.39 The rear dormer is set up from the eaves, down from the ridgeline and in from the edges of the roof slope, ensuring that the extension does not dominate the rear roofslope and is appropriate in size, scale and massing.



- 6.40 The rear part of the property is discretely located down a private access road and existing built structures limit public views into this area from within either Conservation Area. The visual impact of the works will therefore be minimal.
- 6.41 Conservation style rooflights are proposed, with a vertical glazing bar in accordance with paragraph 8.38 of the Council's Conservation and Heritage Guide. The rooflights are obscured from ground level by the existing parapet and would only be visible from long views towards the site on York Road.
- 6.42 The proposed rear-facing windows will replace existing white uPVC windows with heritage-style sash windows, with a wood grain effect, to match those approved on the rear façade under application [AWDM/0103/26](#). As these rear window units are discretely located at the rear of the property and can only be viewed at a distance from public viewpoints, wood-effect uPVC windows will offer a suitable visual appearance and an enhancement on the existing situation.
- 6.43 The proposals will form part of the wider refurbishment of the building, which has detracted from the locally-listed group of buildings and Conservation Area as a whole following a period of vacancy and weather-damage.
- 6.44 The nearest listed buildings is 22 and 24 Brighton Road, on the south side of the road and approximately 40m from the application site. From outside of this listed building the proposed works are roof level will not be visible.
- 6.45 The Warwick Gardens Conservation Area lies to the rear of the site and consists of Warwick Gardens, Wyke Avenue, Elm Road and Ash Grove. The rear elevation of the application site would only be (partially) visible from very limited viewpoints at the far southern edge of the Conservation Area – on Wyke Avenue. From this point of view, the site would be seen in combination with the rear elevations of nos 23 to 47 Brighton Road.
- 6.46 The building does not form a key feature within the Conservation Area and the roof and works proposed would not be visible from any of the 'Important Views' identified within the Steyne Gardens Conservation Area Character Appraisal (2024).



- 6.47 Policy DM23 (Strategic Approach to the Historic Environment) of the Worthing Local Plan supports developments that deliver *“improvements to listed buildings and buildings within Conservation Areas when their condition has deteriorated”* as well as encouraging the best use of heritage assets.
- 6.48 Policy DM24 (The Historic Environment) reiterates national policy in supporting development when the public benefits of the proposal – including securing the optimum viable use of heritage buildings – outweighs the heritage harm. In this instance, the works affect the existing roof which needs urgent repairs and remedial work and therefore the harm to the historic fabric has already occurred from past management/ownership of the building, primarily from water ingress. The works would form part of the approved works to replace the roof structure and refurbish the building throughout.
- 6.49 The works will assist in securing the optimum viable use of the second and third floor accommodation, by delivering a high quality two-bedroom dwelling and meeting the specific local need for two-bedroom dwellings - which account for 40% of Worthing’s market housing need.
- 6.50 For the reasons set out above, these alterations are considered to offer a net improvement in both heritage and visual impact terms and provides clear public benefits that strongly outweigh any heritage impacts from the works proposed. The proposals therefore meet the policy requirements under Policies DM23 and DM24 of the Local Plan and section 16 of the NPPF.

### **Transport and Active Travel**

- 6.51 The highway impacts have been previously assessed for comparable uses under earlier applications. Under a previous planning application (AWDM/1119/25), West Sussex County Council highways raised no objections to the highways impacts of a development that would have delivered a higher density of development.
- 6.52 The site was also assessed by the Council (under application NOTICE/0009/25) as being *“sustainably located within easy walking distance of the various shops*



*and services available within the town centre, and with good public transport links to other parts of the town and destinations further afield”.*

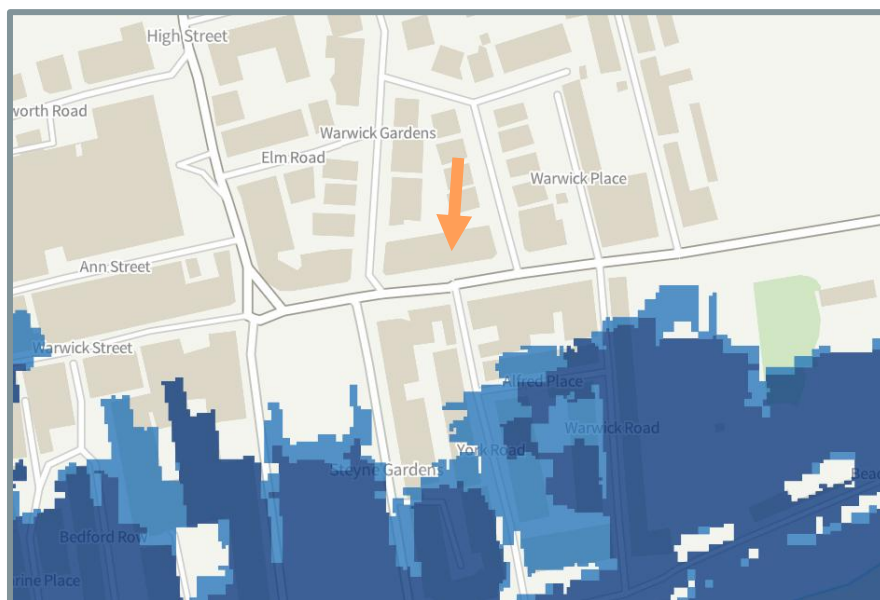
- 6.53 Policy DM15 (Sustainable Transport and Active Travel) of the Worthing Local Plan aims to re-balance travel choices by promoting developments that prioritise active travel and non-car modes of transport.
- 6.54 The application site’s highly sustainable location will ensure that residents can easily access the majority of services on foot and minimises the number of journeys made by private vehicle to and from the site. The effect of these locational factors will significantly reduce the number of private vehicle trips to and from the site, compared to delivering these uses in a less sustainable location. The proposals therefore directly support the aims of Policy DM15 and will provide material benefits as a result.
- 6.55 New cycle parking is proposed under **AWDM/0103/26** and full details are secured by condition under that permission, with a view to providing four cycle parking spaces for the ground and first floor HMO use and a further cycle parking space for the 2<sup>nd</sup> floor residential dwelling. West Sussex County Council parking guidance states that the cycle parking requirement for a 1-bedroom dwelling is the same as that for a 2-bedroom dwelling and therefore the development proposed would not increase the requirement for cycle parking in policy terms.
- 6.56 In addition to the private cycle storage proposed to the rear of the property, there are public Sheffield stands on Brighton Road immediately outside the property – providing additional capacity for visitors and residents.
- 6.57 The site is within Controlled Parking Zone C where parking restrictions apply from 9AM to 6PM, six days a week. The Council is therefore able to control or restrict on-street parking outside of the planning system through permit parking.
- 6.58 Residents will have good access to sustainable modes of transport, with bus services available from the bus stop immediately outside of the property on Brighton Road, and train services within easy walking distance. Residents would not be dependent on private vehicle use for any trips as a result.



- 6.59 Site access will remain unchanged from the existing situation, ensuring safe access into the site is maintained.
- 6.60 For the reasons set out above, the proposed works are unlikely to have any material impact on local transport or highways network. The parking requirements would remain consistent with earlier permissions and there would be no material changes to site access or safety.

### **Flood Risk and Drainage**

- 6.61 The site is in flood zone 1 (lowest area of flood risk), as confirmed by the Environment Agency flood map for planning extract below.



*Flood Map for Planning extract*

- 6.62 The works proposed are all at roof/third floor level and would not change the flood risk vulnerability of the building in any case.
- 6.63 The Council's flood risk consultants advised that they had no objection to previous applications on surface water grounds. Surface water will continue to drain in the same way as the existing situation and will not increase the risk of flooding within or around the site. Access and egress routes will stay the same as existing.



- 6.64 The Government's long term flood risk service shows that groundwater flooding and reservoir flooding are unlikely in this area.
- 6.65 On this basis the site is not in an area of major flood risk and the development proposed will not increase flood risk either on site or elsewhere. The requirements of Policy DM20 (Flood Risk and Sustainable Drainage) are therefore met.

#### Other considerations

- 5.9 The works proposed do not affect any areas of existing biodiversity habitats and therefore statutory biodiversity net gain does not apply in this instance. The development is considered 'de minimis' in this regard.



## **7.0 CONCLUSIONS**

- 7.1 The proposed development at 39 Brighton Road would deliver a larger residential unit at second and third floor levels through the creation of an additional bedroom within the loft space.
- 7.2 The development forms part of a comprehensive package of works that will secure the long-term future of a locally listed building within the Steyne Gardens Conservation Area. Remedial works to replace the existing roof are already required due to the condition of the building and therefore the works will not result in any harm to the historic fabric of the building.
- 7.3 Due to the features of the building and surrounding context, the additions of front rooflights and a rear dormer window at roof level would not be visible from key viewpoints within the streetscene and the works would largely only be visible from long views towards the site.
- 7.4 Works will bring the building back into active use and will help to meet the specific local demand for two-bedroom homes within a highly sustainable town centre location.
- 7.5 Overall, the proposals fully address relevant requirements of the Worthing Local Plan (2023) and the National Planning Policy Framework. They will conserve and enhance the historic environment while delivering high quality residential accommodation within the town centre.
- 7.6 In light of the above Worthing Borough Council is respectfully requested to grant planning permission for the proposed development.

Lewis and Co Planning  
July 2026