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Worthing Borough Council
Adur & Worthing Councils,
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Our ref: JCH/TB/MH/U0029684/2
PP: PP-14265639

22nd September 2025

Dear Sir or Madam

Town and Country Planning Act 1990 (as amended)
The Art Room, Field Place Manor House & Barns, The Boulevard, Worthing, West Sussex, BN13 1NP
Application for Full Planning Permission

I write on behalf of our client, the Driving Vehicle Standards Agency (the 'DVSA'), to submit an application for full planning permission in respect of a change of use from office (Use Class E) to Use Class Sui Generis to allow the DVSA to operate a new driving test centre in The Art Room, which forms part of an outbuilding at Field Place Manor House & Barns, The Boulevard, Worthing, West Sussex, BN13 1NP.

Accordingly, planning permission is sought for the following:

"Retrospective change of use of the Art Room from Use Class E to a Driving Test Centre (Use Class Sui Generis)"

The Site

Field Place Manor House & Barns are located approximately 1.6 miles from Worthing town centre. The A24 and A27 are located approximately 1.5 miles to the northeast, providing good access to the strategic road network. Dunnington-on-Sea railway station is located approximately 360m to the southwest and Worthing train station is located approximately 1.4 miles to the southeast. The site is situated in the middle of the suburbs and is about a 15-minute meandering drive from the centre of Worthing. The Art Room forms part of a building which is a Grade II Listed Building.

This change of use application relates to an outbuilding associated with Field Place Manor House, situated 14 metres to the south. While barns and other buildings approximately 30 metres to the west, together with the Manor House itself, are all in use as a wedding venue, the outbuilding subject to this application is not part of that use.

The building complex consists of three main blocks: the original manor house, the large, converted barns, and the 'Art Block' to which this change of use relates. All three buildings are historic, and Grade II listed: the manor has an 18th-century frontage to an earlier building, with one room containing panels from 1624. The barns and 'Art Block' both have flint facades with brick quoins and dressings.

The Art Room building is bounded by garages to the west associated with Meadway Court residential apartment buildings, the rear gardens of houses on Selkirk Close to the north, landscaping and bowling greens associated with Field Place Manor to the east and beyond that houses on Melrose Avenue and houses on Bolsover Road to the South. Therefore, the local area surrounding is primarily characterised by residential use, although the building sits within a site with a commercial use as a wedding venue.

The Art Room building, to which this application relates, is already being used by the DVSA and they have been operating from this site for at least the last 12 months. The Site was previously used flexibly, with the space hired out to businesses for meetings or temporary office use.

Planning History

There is no relevant planning history for Field Place Manor House & Barns insofar as it relates to this planning application.

The Proposal

Background

The DVSA is an executive agency of the UK Department for Transport and are responsible for carrying out theory and practical driving tests for all types of motor vehicles.

The DVSA and learner drivers in Great Britain are currently facing significant challenges related to booking driving tests. Several factors have contributed to the shortage in bookings, including a combination of resource constraints, geographic distribution, and the lasting impact of the COVID-19 pandemic.

It is estimated that around one million tests were missed because of the pandemic, which has subsequently caused a backlog in driving tests due to temporary test centre closures, limited availability, and increased safety restrictions. Even though these restrictions have eased, the backlog of learners still waiting to take their tests is significant.

In addition, in 2023 (up to the end of May) the DVSA received around 800,000 new bookings for driving tests which showed a 7% increase in demand for driving tests when compared to pre-pandemic levels.

The backlog of driving tests, coupled with increased demand, has subsequently meant that there has been a continued post-pandemic surge in people seeking to complete their driving tests.

However, at present there simply aren't enough test slots to meet the demand. As a result, learners are often left unable to find an available test for months in advance and are resorting to booking tests in areas of Great Britain much further from their nearest test centre in order to secure a test date.

The DVSA is therefore actively working to invest in new test centres to address the growing demand for driving tests, with a particular focus on areas of Great Britain where there is particularly high demand or where current test centres are oversubscribed.

The Proposal

Although the building is Grade II listed, the proposal does not involve any internal or external alterations, nor have any such works previously been undertaken by the DVSA to facilitate its use as a driving test centre. As the change of use does not give rise to works that would affect the special architectural or historic interest of the building, Listed Building Consent is not required and accordingly has not been sought. This application therefore seeks planning permission only for the change of use.

The DVSA has identified the Art Room at Field Place Manor House & Barns, The Boulevard, as an appropriate location for a new driving test centre and have been in occupation for at least 12 months.

As such, this application seeks a change of use of the Arts Room from Office (Use Class E) to a Driving Test Centre (Use Class Sui Generis) to allow the DVSA to continue to use the floor space for this use.

Space is required by DVSA to meet the local need for car (Cat B) driving tests and the government's objective to reduce driving test waiting times. The site is on an established test route and provides appropriate internal space and car parking.

The driving tests will start and finish on the site and will consist of a health and safety compliance check before the candidates leave the site to carry out the tests on pre-delegated routes on the local road network, returning just under an hour later. It is expected, due to the nature of the site and the tests to be undertaken, that candidates will arrive by private vehicle.

Four driving examiners will be present on the Site along with two managers. The core opening hours will continue to be 08:00 to 15:30, with testing undertaken throughout the week. An examiner will typically conduct seven tests per day within these core hours, meaning that four examiners can conduct 28 tests during these time periods. Overtime hours are available between 07:00 and 08:00, and between 15:30 and 18:00. This would allow an examiner to deliver up to 12 additional tests during these time periods. The centre can accommodate up to 40 tests per day, meaning that three examiners would deliver the additional eight tests required.

Tests slots are 57 minutes, where the driving element typically lasts approximately 30-40 mins. As such, there are not likely to be any movements relating to the proposed use after 18:40.

The total floorspace related to this change of use is 46.41qm.

For the avoidance of doubt, there are no internal or external changes required to both the building or the car parks in association with the DVSA's use of the site.

Planning Policy Context

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The statutory development plan for the purposes of this application is the Worthing Local Plan 2023, which was adopted in March 2023.

The Site has the following planning policy designations:

- Policy DM23: Strategic Approach to the Historic Environment
- Policy DM24: The Historic Environment

The building is a Grade II Listed Building, under Historic England List Entry Number: 1354772. All the listed buildings at Field Place form a group.

Whilst not forming part of the Statutory Development Plan, the following documents remain important material considerations.

- National Planning Policy Framework (NPPF) (2024); and
- National Planning Practice Guidance (NPPG) (as amended).

Planning Policy Considerations

Principle of Development

Part (d) of paragraph 125 of the NPPF (2024) states that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if available sites could be used more effectively.

Paragraph 128 of the NPPF advises that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

Paragraph 101 of the NPPF (2024) states that 'significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development'.

Policy SP1: Presumption in favour of sustainable development in the Worthing Local Plan notes that applications that accord with the relevant policies outlined in said plan will be approved without delay.

Policy SS1: Spatial Strategy in the Worthing Local Plan notes that developments within the Built Up Area Boundary should conform to the policies set out in the Local Plan and ensure efficient land use that relates to the uses and character of surrounding land.

Policy DM5: Quality of the Built Environment in the Worthing Local Plan stipulates that all new development, including changes of use, should have regard to the character of the area, respect existing heritage assets and not have an unacceptable impact on surrounding development, including through aspects like vehicle movements.

Policy DM8: Planning for Sustainable Communities / Community Facilities in the Worthing Local Plan notes that the Council will support improvements to educational buildings to help meet the local community's needs.

Policy DM10: Economic Growth and Skills in the Worthing Local Plan states that underutilised employment sites should be identified and made more efficient where possible.

Policy DM11: Protecting and Enhancing Employment Sites in the Worthing Local Plan stipulates that existing premises used for employment should be protected against losses to other uses.

Policy DM23: Strategic Approach to the Historic Environment in the Worthing Local Plan notes that local historic character should be respected and encourages effective usage of historic buildings across all sectors, including education.

Policy DM24: The Historic Environment in the Worthing Local Plan stipulates that planning permission will only be granted to a heritage asset provided that the appearance, significance, or historic character of the Listed Building is not adversely affected.

Whilst it is acknowledged that a driving test centre would be a Sui Generis Use Class, the proposed use of the Art Room to support the needs of the DVSA would be commensurate to the current lawful use as offices which falls under the E (g) Use Class. The proposal would therefore comply with Policy DM11 of the adopted Local Plan which seeks to protect existing employment sites.

With respect to Policy DM11, it should also be noted that the 'Art Room' at Field Place Manor House & Barns is already being used successfully by the DVSA as a driving test centre. This demonstrates that the change in use of the building is an effective use of the site which brings with it economic benefits and also supports the wider commercial use of the site; therefore, the change of use would not pose a detrimental loss of office space to Worthing. As such, the floor space would benefit from being regularised as a driving test centre to address an urgent need faced by both Worthing residents and a central Government Objective to provide new driving test centres.

The increased demand for driving tests coupled with the existing delays in the local area indicates that there is a need which cannot be met through existing provision in Worthing. In accordance with Policy DM10 and DM11 of the Local Plan, regard must be given to the significant challenges currently faced by the DVSA and the urgent need for a new driving test centre to serve the Worthing area. As such, the introduction of a new driving test centre in this sustainable location where employment uses are protected would help to relieve these delays and better manage the significant demand for driving tests within the area, whilst also continuing to retain the building in employment use.

Transport

Policy DM15: Sustainable Transport & Active Travel in the Worthing Local Plan highlights that all new development should aim to promote non-car methods of transport. It also stipulates that any development which is likely to generate significantly higher demands for travel be supported by a Transport Assessment / Transport Statement and sustainable Travel Plan that is produced in accordance with West Sussex County Council guidance and the NPPF.

Supporting paragraph 5.213 notes that Worthing has problems of heavy congestion, especially at peak times, that slows traffic flows and reduces air quality.

Supporting paragraph 5.225 notes that any new development must consider its impact on the existing transport network.

In general, driving testing centres play an important role in maintaining highway safety because the efficient and timely provision of driving tests help to ensure a good standard of driver behaviour and, therefore, contribute to general highway safety.

A Transport Statement has been prepared by Stantec and is submitted alongside this application.

The Transport Statement highlights, in line with Local Plan Policy DM15, that the site can be accessed via bus, rail, walking and cycling or via the local highway network, emphasising that the site is easily accessible by a range of transport methods and therefore represents a sustainable location.

In terms of vehicle parking provision on, there are 6 allocated parking spaces for candidates in the lower car park and staff parking will continue to be located in the unallocated car parking adjacent to the Art Room.

Given the proposed use of the site as a driving test centre, the level of parking provision is considered appropriate for the nature of the use. The proposed parking arrangements replicate the existing provision, which has been demonstrated to operate efficiently.

An assessment of trip generation determined that providing up to 40 tests per day will generate 86 vehicle arrivals and departures throughout the day. The site will generate 16 trips in the AM peak hour (8am to 9am) and eight two-way movements in the PM peak (5pm to 6pm). These traffic flows would not have a severe impact on the operation of the local road network.

The Transport Statement reiterates that the site currently operates as a DVSA test centre, and therefore no increase in traffic beyond the existing site operation is expected and as such the proposals are considered compliant with Policy DM15 of the Local Plan.

Summary and Conclusions

The DVSA are currently facing significant challenges related to booking driving tests and, at present, the demand to book tests disproportionately outweighs the quantum of tests available. The DVSA is therefore actively and urgently working to invest in new test centres to address the growing demand for driving tests, with a particular focus on areas where there is particularly high demand or where current test centres are oversubscribed.

This application therefore seeks to retrospectively change the use of the Art Room of Field Place Manor House & Barns from Offices (Use Class E) to a Driving Test Centre (Use Class Sui Generis).

The proposed use would repurpose the Art Room which would help to address an urgent need locally for new driving test centres and would retain this part of the building in employment use.

As a result, it is considered that the proposal accords with planning policy and should be approved.

Application Enclosures

Accordingly, in support of this application, along with this letter, we enclose the following documents:

- Application Form; prepared by Newmark;
- Covering Letter, prepared by Newmark;
- Site Location Plan, prepared by Spacio;
- Existing and Proposed Site Block Plan, prepared by Spacio;
- Existing and Proposed Floor Plans, prepared by Spacio; and
- Transport Statement, prepared by Stantec.

The associated planning application fee of £588 has been paid online via the Planning Portal concurrent to the submission of this application.

We trust that we have provided all of the material required for the purposes of validation and therefore awaiting confirmation of the registration and validation of this application shorty. In the meantime, should you have any queries regarding this application please contact Tom Beardsmore [redacted] or Megan Hearn [redacted] of this office.

Yours faithfully

[redacted]

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