

Planning, Design and Access Statement (incorporating Heritage Impact Assessment)

Proposed insertion of new window openings

First and Second Floors, 105-109 Montague Street, Worthing, BN11 3BP

Prepared for

Danworth Holdings Ltd

Prepared by

Sarah Sheath BSc (Hons) DipTP MRTPI

Date

February 2026

Version

FINAL

Contents

Page

1.	Introduction	1
2.	Site and Surroundings	2
3.	Planning History	3
4.	Proposed Development	4
5.	Planning Policy	6
6.	Worthing Local Plan (2023)	6
7.	Material Considerations	6
8.	Planning Considerations	9
9.	Conclusion	13



1. INTRODUCTION

- 1.1. dowsettmayhew Planning Partnership is instructed by Danworth Holdings Ltd to submit a full planning application for the insertion of new window openings in the first and second floors of 105-109 Montague Street, Worthing. The application is submitted in support of an associated application seeking prior approval for the change of use of the first and second floors of the building from Class E (offices) to Class C3 (dwellinghouses) under Class MA of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development)(England) Order 2015, as amended (GPDO).
- 1.2. While Class MA permits the change of use of the premises (subject to the grant of the prior approval application) it does not permit any physical operational development. National Planning Practice Guidance (paragraph 055, Reference ID:13-055-20140306) notes that “*where associated physical development is required to implement the change of use, developers will need to consider whether it constitutes development and ensure they have planning permission if necessary.*” The guidance therefore clearly anticipates situations such as this where operational development is required in order to implement a change of use permitted by the GPDO.
- 1.3. The existing building currently has limited external openings at first and second floor. The proposals have therefore been designed in order to provide adequate natural light to the habitable rooms of the proposed dwellings sought via the associated prior approval application. Notwithstanding the outcome of that application, insertion of the windows as a standalone proposal would be beneficial to the premises in their current lawful use. The new openings would provide design improvements and would increase internal natural light. From a sustainability standpoint this would encourage less use of artificial light and reduce energy consumption, and could also facilitate internal subdivision of the space which may make the space more attractive to future occupiers.
- 1.4. In addition to this supporting statement the application comprises the following:
 - Application form;
 - CIL additional information form;
 - First Floor Plan as Existing (01);
 - First Floor Plan as Proposed (01A);
 - Second/Roof Plan as Existing (02);
 - Second?roof Plan as Proposed (02A);
 - Partial Ground Floor Plan as Existing (03);
 - Section AA as Existing (04);
 - Section BB as Existing (05);

- Elevations as Existing (06);
- Block & Site Location Plans (TA 1591/10);
- Proposed West / Side Elevation (TA 1591/14);
- Proposed South/Front Elevation (TA 1591/15);
- Proposed East/Side Elevation (TA 1591/16);
- Proposed East/Side Elevation showing neighbouring buildings (TA 1591/16A)
- Proposed North/Rear Elevation (TA 1591/17);
- Proposed Section BB (TA 1591/18);
- Proposed Section CC (TA 1591/19);
- Proposed Section DD (TA 1591/20); and
- Flood Risk Assessment.

1.5. This Supporting Statement describes the site, sets out relevant planning history, describes the proposed development, summarises relevant planning policy, and assesses the scheme in accordance with the requirements of the Development Plan and other material considerations, including the National Planning Policy Framework (NPPF).

2. SITE AND SURROUNDINGS

- 2.1. The building the subject of this application is a large two storey structure with a smaller second floor plant room located towards the front of the building. The site is located within the town centre of Worthing. The building dominates a large plot some 0.07 hectares in size, to the south of Montague Street, north of Augusta Place, and west of Prospect Place. To the immediate west of the building is a narrow service passage, with cottages beyond.
- 2.2. The existing building is a flat roofed, brick built structure understood to have been constructed in the 1960s.
- 2.3. The ground floor is currently occupied by CHEC Worthing, a healthcare centre providing Ophthalmology, Gastroenterology, Dermatology and Ear, Nose and Throat services.
- 2.4. The first floor has previously been occupied as offices in association with the entire building's former use as a Job Centre, but has been vacant since early 2024.
- 2.5. The building is slightly set back from the main Montague Street frontage, with a large projecting canopy over the ground floor. At the rear is a small forecourt/servicing/parking area.
- 2.6. Montague Street itself is a pedestrianised street, designated within the Worthing Local Plan as part of the main Primary/Secondary Shopping Area.

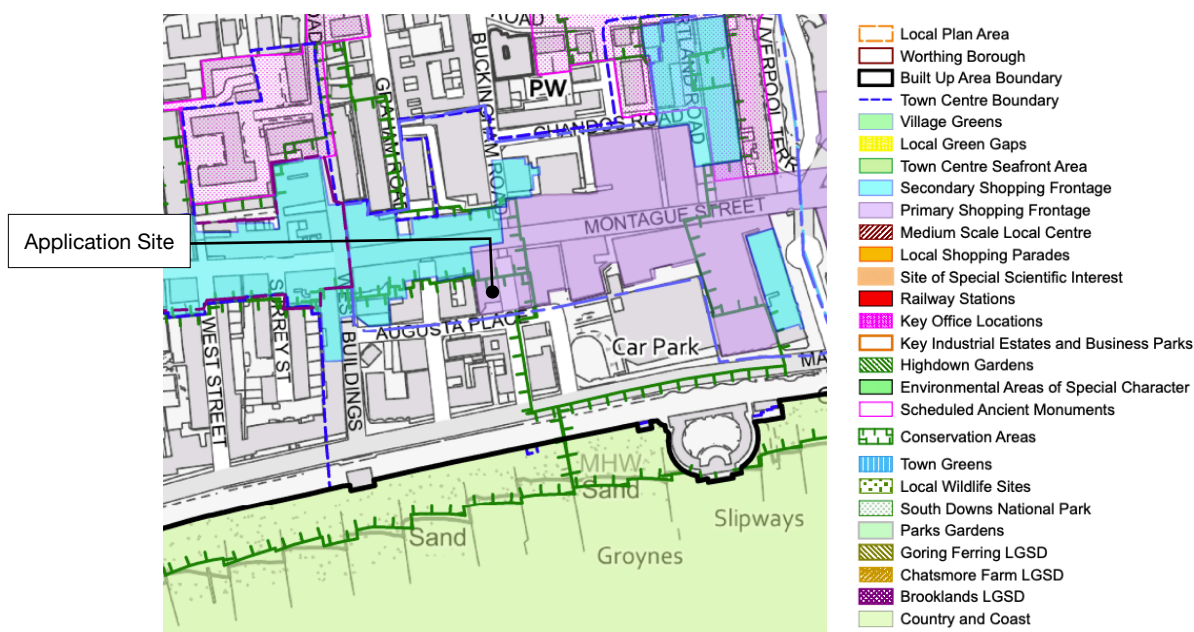


Figure 1 - Extract from Worthing Local Plan 2023 Town Centre Insert Map

- 2.7. The site also falls within the Montague Street Town Centre Character Area and both the Montague Street and Marine Parade and Hinterland Conservation Areas.
- 2.8. The buildings along Montague Street are a mixture of styles and are generally two or three storey heights. Along Prospect Place to the east, the facing buildings are predominately three storey town houses, with additional accommodation in their roof spaces. Numbers 10-18 Prospect Place are Grade II listed, as is 101-103 Montague Street, which sits on the corner of Prospect Place immediately adjacent the site.
- 2.9. Augusta Place to the south, hosts a mix of residential and commercial buildings. Augusta House, which fronts the seafront, is prominent in views from the rear of the application site being eight stories in height.
- 2.10. To the immediate west of the site, is a modern courtyard mews development of residential dwellings, the rear elevations of which abut the intervening service passage.

3. PLANNING HISTORY

- 3.1. A review of the Local Authority's online planning register reveals the following most recent applications relate to the application site:
 - **09/0728/FULL** - Installation of a new shop front to front and side elevations (Retrospective) - Approved 21st October 2009.
 - **09/0729/ADV** - Installation of an internally illuminated sign on the existing projecting canopy over ground floor shop front (Retrospective) - Approved 21st October 2009

- **AWDM/1763/18** - Demolition of existing building and redevelopment set over 4no. floors, comprising A1 retail floor space at ground floor, 26no. 1, 2 and 3 bedroom units with communal courtyard and balconies at 1st floor to West elevation, cycle store, underground surface-water tanks and associated landscaping - Approved 1st May 2019.
- **AWDM/0526/20** - Approval of Details Reserved by Condition 20 i) (Asbestos Removal) of previously approved AWDM/1763/18 - Approved 24th April 2020

4. PROPOSED DEVELOPMENT

- 4.1. As set out above, prior approval is concurrently being sought to change the use of the first and second floors of this building to provide a net increase of 13 residential dwellings under Class MA of Part 3 of the GPDO. In order to facilitate this change of use and to ensure all proposed habitable rooms receive adequate natural light a number of new openings are proposed.
- 4.2. In the front (north) elevation no alterations are proposed to the existing first floor openings. At second floor, the existing second floor grill openings will be increased in height slightly to match the height of the first floor windows and glazed to provide window openings to the new second floor units.

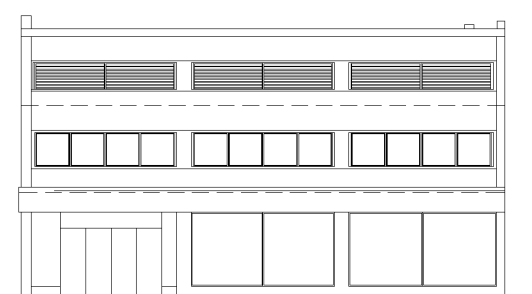


Figure 2 - Existing North Elevation

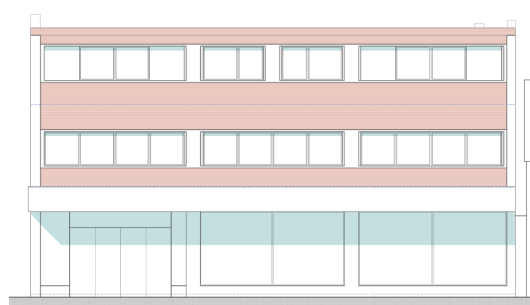


Figure 3 - Proposed North Elevation

- 4.3. In the east elevation it is proposed to increase the depth of six of the existing high level windows, to a height of 1.5 metres. In order to protect the amenity of the neighbouring residential properties, a number of panes will be glazed with obscure glass to prevent direct overlooking in to the existing dwellings.

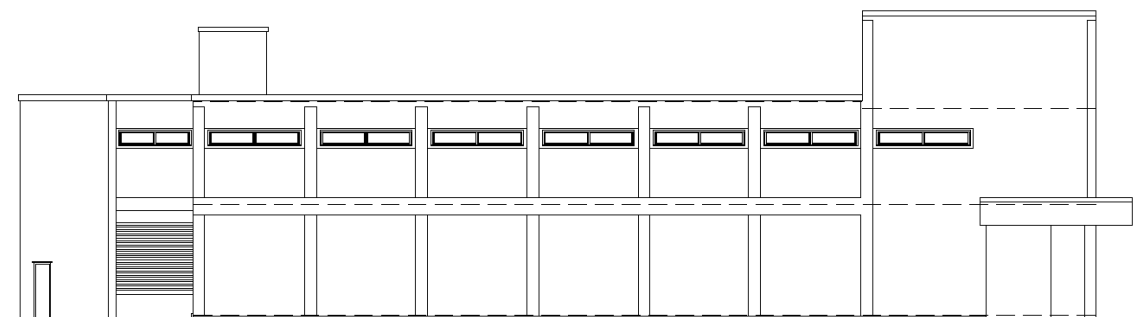


Figure 4 - Existing East Elevation

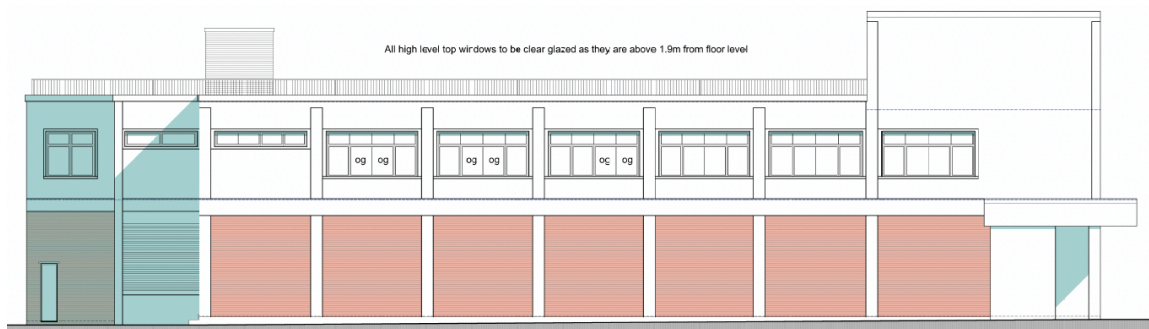


Figure 5 - Proposed East Elevation

- 4.4. A new opening is also proposed in the east elevation of the rear projecting section of the building, over the existing loading bay area.
- 4.5. In the south (rear) elevation it is proposed to insert a new first floor window in the rear projecting wing, whilst also increasing the depth of the existing high level windows. At second floor the existing grill openings will be largely infilled with two new windows and one new door opening created.

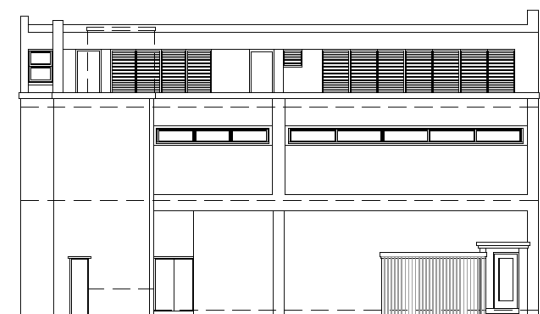


Figure 6 - Existing South Elevation

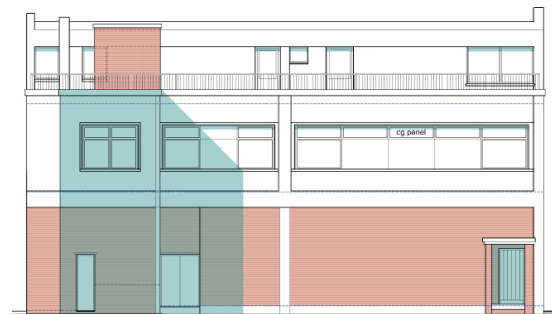


Figure 7 - Proposed South Elevation

- 4.6. In the west elevation it is proposed to insert five large windows and one small window at first floor.

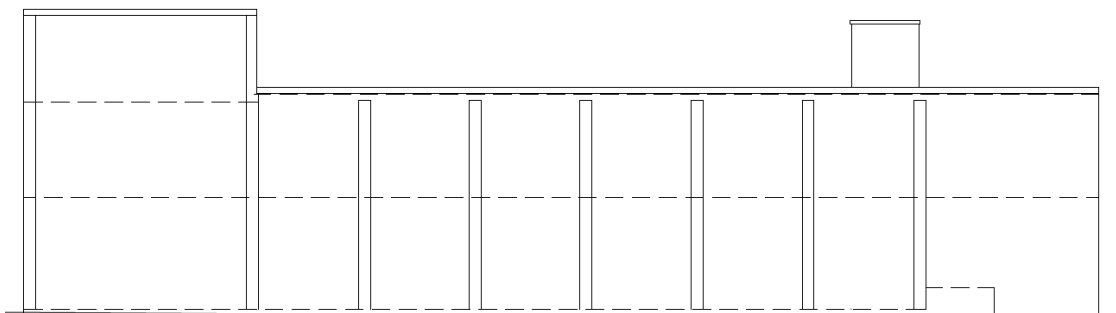


Figure 8 - Existing West Elevation



Figure 9 - Proposed West Elevation

5. PLANNING POLICY

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The relevant Development Plan for the purposes of this application comprises the Worthing Local Plan, adopted March 2023.
- 5.3. Material considerations include the National Planning Policy Framework (NPPF), National Planning Practice Guidance (PPG) and Supplementary Planning Documents (SPDs).

6. WORTHING LOCAL PLAN (2023)

- 6.1. Worthing Local Plan was adopted in March 2023 and sets out the strategic development and land use priorities for Worthing (outside the South Downs National Park) up to 2036. It contains the policies against which development management decisions within that area will be made.
- 6.2. The following policies of the Local Plan are considered most relevant to the consideration of these proposals:
 - SP1 - Presumption in favour of sustainable development
 - SP2 - Climate Change
 - SS3 - Town Centre
 - DM5 - Quality of the Built Environment
 - DM24 - The Historic Environment

7. MATERIAL CONSIDERATIONS

National Planning Policy Framework (Nppf)

- 7.1. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It was most recently updated in December 2024.
- 7.2. Paragraph 7 sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, which is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 7.3. Paragraph 8 sets out that achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.
- 7.4. Paragraph 10 states so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.
- 7.5. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. This notes that for decision taking this means:
 - Approving development proposals that accord with an up-to-date development plan without delay; or
 - Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 7.6. Chapter 4 relates to decision-making.
- 7.7. Paragraph 39 states that, local planning authorities should approach decisions on proposed development in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. It requires decision-makers at every level to seek to approve applications for sustainable development where possible.
- 7.8. Chapter 11 relates to making an effective use of land.
- 7.9. Paragraph 124 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.10. Paragraph 125 sets out that planning policies and decisions should, amongst other things, promote and support the development of under-utilised land and buildings.
- 7.11. Chapter 12 relates to achieving well-designed and beautiful places.

- 7.12. Paragraph 131 notes that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It notes that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.13. Paragraph 135 states that planning policies and decisions should ensure that developments, amongst other things:
- Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and
 - Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 7.14. Chapter 14 relates to meeting the challenge of climate change, flooding and coastal change and sets out that, amongst other things, the planning system should help to: shape places in ways which contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure.
- 7.15. Chapter 16 relates conserving and enhancing the historic environment.
- 7.16. Paragraph 202 states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for existing and future generations.
- 7.17. Paragraph 207 states that in determining applications LPA's should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It notes that the level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 7.18. Paragraph 210 states that in determining applications, LPA's should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 7.19. Paragraph 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is

irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 7.20. Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

8. PLANNING CONSIDERATIONS

- 8.1. In determination of this full planning application, it is considered that the main issues are:

- The effect on the character and appearance of the area, including heritage impact; and
- The effect on neighbouring occupiers

- 8.2. Each of these are now considered in turn.

Effect On The Character And Appearance Of The Area, including Heritage Impact

- 8.3. Policy SS3 seeks to improve and increase the mix of uses in the town centre and in doing so seeks to ensure development has high architectural, urban design, environmental and sustainability standards.
- 8.4. Policy DM5 seeks to ensure all new development is of a high architectural and design quality and respects and enhances the prevailing character of the area.
- 8.5. With the application site falling across two designated Conservation Areas and immediately adjacent a number of listed buildings the impact of these proposals on the special character and appearance of the Conservation Areas and the setting of the listed buildings is an important consideration in the determination of this application. In this respect Policy DM24 seeks to ensure new development does not adversely affect heritage assets or their setting.
- 8.6. The front half of the application site falls within Montague Street Conservation Area, designated as such in March 2000. The Montague Street Conservation Area Appraisal describes the area around the application site as follows:

“This section of Montague Street is an important part of the town centre shopping area. Wholly pedestrianised, it is a corridor type urban space enclosed by two to four storey buildings on both sides of the street. In this section of the street, there are two listed buildings and several other buildings have considerable local historic or architectural interest. The north side of the street especially has good townscape quality. The quality and character established by the buildings is to some extent eroded by intrusive street furniture, several unsympathetic shopfronts and advertisements and the poor design and inappropriate materials of some post war building. During shopping hours, the street is bustling with pedestrians; it is a lively retail street which attracts people from Worthing and beyond. Montague Street is also a popular destination for many of the resort's visitors. Upper floors of buildings are used for purposes ancillary to the retail uses.”

- 8.7. The rear half of the site falls within the neighbouring Marine Parade and Hinterland Conservation Area, also designated such in March 2000. In describing the Augusta Place, New Street and Prospect Place area of this Conservation Area, the Conservation Area Appraisal notes the following:

“Remnants remain of the 19th century residential streets which formerly existed in this area, including a number of listed buildings located between the seafront and the pedestrianised section of Montague Street. The area is now dominated by Augusta Place, a one-way service road constructed in the early 1970s. There are a range of uses within the area located within buildings of varied ages and styles. The area contains numerous dead frontages as well as areas of car parking both on and off the street. Several of the buildings are in a poor state of repair or not in full use. The terraced properties in the northern part of the area are of particular historic and architectural interest.”

- 8.8. The south elevation of the application building clearly represents one of the dead frontages referenced in the appraisal. The introduction of the new windows will help animate the existing elevation and bring some visual interest to the otherwise bland facade.
- 8.9. As noted above all of the properties facing the application site to the east along Prospect Place are Grade II listed buildings.
- 8.10. 10-18 Prospect Place are all grade II listed buildings (list entry 1263206) having been added to to the National List by Historic England on 10th November 1975. The official list entry by Historic England provides the following description:

“PROSPECT PLACE 1. 5406 (East Side) Nos 10 to 18 (even) TQ 1402 SE 4/152 10.11.75. II GV 2. Probably before 1814. Terrace cottages. 3 storeys and attic. One sash window each (without glazing bars and some modified). All ground floor windows enlarged except that of No 16. Right-hand doors, all modern except that of No 10, which is of 6 panels, bottom pair moulded, the next fielded and the top glazed. Nos 10 and 12 are stucco-fronted; Nos 14-18 of cobbles, with painted brick quoins to openings and between houses. All have painted brick modillion eaves cornice, to front and rear except to front of No 10.”

- 8.11. At the corner of Prospect Place and Montague Street, 101-103 Montague Street is also grade II listed (list entry 1250468). This building was added to the National List by Historic England on 21st May 1976. The official list entry by Historic England provides the following description:

“Remodelled early C19 (and again late C19) but perhaps C17 in origin. Possibly timber framed. 2 storeys and attic. North front, on Montague Street: 2 sash windows of Victorian type below dentilled cornice. 4-light casement window in gable, which has shouldered parapet. 2-storey extension to east, with parapet and flat roof. West front: one sash window matching those of north front. Whole ground storey frontage remodelled with glazed tiles and Victorian sashes. Stucco above. Steep pitched slate roof. Interior has ground floor lower than street level. The building leans slightly to the north.”

- 8.12. On the opposite side of Montague Street, at the corner of Buckingham Street is the former Buckingham Arms Public House, 80 Montague Street. This is another grade II listed building (list entry 1250443). This building was also added to the National List by Historic England on 21st May 1976. The official list entry by Historic England provides the following description:

“Probably circa 1800 or earlier, but much modified. 2 storeys and attics. Stuccoed. M-form roof, with slates, coping to gables and parapet to street on south, over narrow frontage. One sash window with glazing bars. Longer front to Buckingham Road on the east. 4 sash windows with glazing bars (but the 2 left ones blind). 4 casement windows in attic. 2-storey extension to north. Ground floor corner remodelled in the Victorian period. 6 pilasters, fluted in upper sections, paired at ends and to bevelled corner doorway.”

- 8.13. The building the subject of this application is a substantial post war structure of negligible heritage significance given its age and design. Furthermore the presence of large expanses of dead frontages/blank or nearly blank elevations are features, expressly identified in the Conservation Area Appraisal as detracting features.
- 8.14. The proposals do not alter the height, massing or footprint of the existing building and will not affect the historic pattern of development or key townscape views. Furthermore, the proposals will not alter the physical relationship with any of the surrounding heritage assets.
- 8.15. The new and enlarged openings have been designed to reflect the size and rhythm of the existing openings. They will serve to break up the existing large expanses of brickwork, improving articulation and introducing visual interest to the elevations.
- 8.16. It is submitted that the proposed alterations are sympathetic to the character and appearance of the existing building and will not compromise the character or visual integrity of the wider Conservation Area, nor will they cause harm to the setting of the listed buildings. On the contrary, the scheme secures a minor enhancement to the design and appearance of the building by reducing areas of blank facade.
- 8.17. If the local authority nevertheless considers that the proposals give rise to harm, it can be no more than less than substantial harm, given the minimal intervention proposed and the limited significance of the existing building. In accordance with paragraph 215 of the NPPF where a development proposal is found to lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.
- 8.18. National Planning Practice Guidance¹ explains that *“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.”*
- 8.19. The proposed external works to this building are clearly linked to the applicants proposals to convert the first and second floors of the building to residential use. The delivery of 13 new residential dwellings within a highly sustainable town centre location, which makes optimal use of an existing brownfield site, is a clear public benefit of these proposals. Whilst it is understood that the local authority are currently able to demonstrate a 5 year supply of housing, this does not set

¹ Paragraph: 020 Reference ID: 18a-020-20190723

aside the Government's clear objective of significantly boosting the supply of homes, and to make the most effective use of existing land. Paragraph 125 of the NPPF clearly states that the development of underutilised land and buildings should be supported.

- 8.20. Without prejudice to the applicants own assessment of matters, in the event of the local authority concluding that the proposals cause harm to the heritage assets it is submitted that the benefits clearly outweigh any perceived harm.

Effect On Neighbouring Occupiers

- 8.21. In setting out design expectations of new development, Policy DM5 seeks to ensure all new development does not have an unacceptable impact on the occupiers of adjacent properties, particularly residential dwellings, including *inter alia* loss of privacy.
- 8.22. The proposals have carefully considered the relationship with the neighbouring properties, noting that there are a number of dwellings within close proximity of the site.
- 8.23. To the north, on the opposite side of the Montague Street, the relationship with the residential units over the opposite retail units will remain unchanged. Whilst additional window openings are proposed at second floor, their separation distance and alignment replicate the existing first floor relationship. The proposals will not therefore result in any material increase in overlooking.
- 8.24. To the south, the new windows will look over the Augusta Place service road and parking areas. The closest first floor window facing the application site to the south is in excess of 25 metres away and therefore will not be impacted by the addition of the windows.
- 8.25. To the west, the proposed windows face only the roof plane of the neighbouring New Street mews properties. Although there are a small number of rooflights on the rear (east) roof slope of these dwellings, the new windows have been carefully positioned to create an offset relationship that avoids any direct alignment. In addition, the close proximity and relative height of the windows will ensure that no direct overlooking into adjacent rooms would be possible.
- 8.26. To the east, similar careful consideration has been given to the relationship with the existing facing properties along Prospect Place. Where direct alignment arises between existing and proposed windows it is proposed that obscure glazing will be used to protect the amenity of the existing neighbouring occupiers. This is illustrated in Figure 10 below.



Figure 10 - Proposed east elevation with position of neighbouring windows shown dashed

- 8.27. When considering the proposals submitted previously at this site under application AWDM/1763/18 the introduction of new windows along Prospect Place and the impact on the privacy of the existing occupiers was given careful consideration. The officers report notes:
- 8.28. *“In terms of privacy, the proposals will introduce several new sitting-room/diner and bedroom windows along Prospect Place at each of the proposed floors. The design has sought to offset windows as much as possible, but given the architectural form and functional constraints of the development, it is not possible to avoid this.”*
- 8.29. Ultimately the relationship was accepted in the approval of the application. Whilst this approval has now time expired, the local authority’s assessment and acceptance of this relationship is material to the consideration of this current application. The scheme now submitted for consideration, proposes far fewer new windows, and proposes them at first floor level only. This is a town centre location where the historic street layout naturally positions buildings in close proximity to one another. Given the constraints of the site, existing relationships and past approved development, it is submitted that the proposed relationship with the existing neighbouring properties is acceptable and can be supported.

Other Material Considerations

- 8.30. Policy SP2 encourages developments to reduce the amount of energy use in both the construction and operation of buildings and seeks to improve energy efficiency. Whilst primarily proposed to facilitate the change of use of the premises to residential use, in the event of the prior approval application being found unacceptable, it is submitted that the proposals as a stand alone application are acceptable on the grounds that they will improve natural light reaching the first and second floors of the building, therefore reducing energy consumption.

9. CONCLUSION

- 9.1. This statement has been prepared in support of a full planning application for the insertion of new and enlarged window openings at first and second floor levels at 105–109 Montague Street, Worthing. The proposed works are required to facilitate a concurrent Class MA prior approval application seeking to convert the upper floors of the building from Class E (office) use to 13 residential dwellings. The window alterations are essential to ensure that all proposed habitable rooms receive adequate levels of natural light in accordance with national guidance.
- 9.2. The building occupies a prominent town centre location and lies partly within the Montague Street Conservation Area and partly within the Marine Parade and Hinterland Conservation Area. It also sits in close proximity to several Grade II listed buildings. The existing building is of limited architectural or historic merit, with large areas of blank and inactive frontage that detract from the appearance of the wider streetscape. The proposed window insertions have been sensitively designed to reflect the rhythm of existing openings and to provide visual enhancement without altering the scale or massing of the existing building or the established urban grain of the area. The works will not harm the character or appearance of either Conservation Area or the setting of nearby listed buildings, and in some areas will deliver a subtle improvement through increased articulation of the façades.

- 9.3. The proposals have also been carefully designed to safeguard the amenities of neighbouring residents. Where new or enlarged windows have potential to directly face existing habitable rooms, particularly along Prospect Place, obscure glazing is proposed to prevent overlooking. Elsewhere, the spatial relationships between buildings, existing separation distances and the position and height of the proposed openings ensure that no harmful loss of privacy or amenity will arise.
- 9.4. The development accords with the relevant policies of the Worthing Local Plan, including Policies SS3, DM5 and DM24, and aligns with the objectives of the NPPF to make effective use of underutilised buildings and promote sustainable, well-designed development. The introduction of new windows will also improve natural daylight levels within the building, reducing reliance on artificial lighting and supporting improved energy efficiency.
- 9.5. Overall, the proposals represent a modest but beneficial enhancement to an existing building within the town centre, while facilitating the delivery of new homes in a highly sustainable location. The scheme is considered to be acceptable and it is therefore respectfully submitted that planning permission should be granted.