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Our Ref: CRG/HL/LOR002-1-0/7763

Your Ref:

11 November 2026

Dear Sirs

Application under Section 73 of the Town and Country Planning Act 1990 (as amended) for the variation of Planning Condition 2 of Planning Permission WB/03/1173/FULL in relation to the Adult Gaming Centre ("AGC") at ground floor, Cassino (Arcade A) 14 Guildbourne Centre, Worthing Central, Worthing, BN11 1LZ

1. Summary of this application

1.1 This application is submitted by Woods Whur 2014 Limited on the instruction of the applicant Lordsdale Worthing Limited (Registered company no.10981956 with registered offices at 20 Lennox Street, Bognor Regis, West Sussex, United Kingdom PO21 1NA) in respect of premises trading as Cassino, 14 Guildbourne Centre, Worthing Central, Worthing, BN11 1LZ.

1.2 This letter and the enclosed documents are submitted in support of the application to vary the opening hours of the premises set out in Condition 2 of planning permission WB/03/1173/FULL. The current condition 2 limits the opening hours from 09:00 until 18:30 hours daily.

1.3 This application seeks to vary the hours to midnight daily, and proposes to amend condition 2 to read as follows:

'The use hereby permitted shall be open to the public 09:00 to 00:00 hours (midnight) - Monday to Sunday'.

1.4 The proposal will allow trading 09:00 until midnight, 7 days a week.

1.5 The hours being applied for under this application reflect the hours currently authorised and granted under the premises Licence issued by the Licensing Authority pursuant to section 164 of the Gambling Act 2005.

1.6 This application together with supporting documentation show that the variation of Condition 2 to allow trading until midnight each day would have no negligible adverse impact; while it would support the continuing success of the Adult Gaming Centre at these premises, thereby ensuring continuing investment and employment.

Directors: Patrick M Whur • Andrew J Woods •

Woods Whur 2014 Limited is authorised and regulated by the Solicitors Regulation Authority. SRA No: 613288. Woods Whur 2014 Limited is a limited company incorporated in England and Wales with registered number 8973858. Woods Whur 2014 Limited is registered at St James House, 28 Park Place, Leeds, LS1 2SP. VAT No: 187 289 453

2. The Applicant

2.1 The applicant, Lordsdale Worthing Limited, is a family run business. It is a responsible and experienced independent operator of Adult Gaming Centres and Licensed Betting Offices and holds an Operating Licence issued by the Gambling Commission who strictly regulate all gambling operators.

2.2 The applicant currently operates 5 licensed gambling premises. The family opened their first AGC in 1996 in Bognor Regis, shortly followed by Worthing, Littlehampton and a further site in Bognor Regis High Street in 2008 and their latest opening being in Chichester earlier this year. They trade under the name Cassino and all their premises operate without any complaints of noise, nuisance, crime or disorder.

2.3 All of the applicant's AGCs operate in a mixed-use/town centre environment in the same way and under the supervision of a knowledgeable and experienced senior management team that includes the business owners. The owners are 'hands-on' operators and regularly visit each premises and communicate directly with neighbours, including residents. All of the applicant's AGCs are staffed by a team of experienced and trained employees.

3. The background and purpose to this application

3.1 The premises previously applied for and was granted planning permission reference WB/07/1213/FULL to vary condition 2 to allow trading until 22:00 hours each day. A copy of the decision in relation to this application can be found at Appendix 3.

3.2 This permission was granted for a temporary period of one year until 31 December 2008. The reason for this was to enable the Local Planning Authority to assess the impact of the extended opening hours on the surrounding locality and ensure that residential amenity was appropriately protected.

3.3 Whilst we acknowledge that the previous operation of the premises during these hours took place some time ago, it nevertheless demonstrates that the premises have successfully operated within these extended hours. No complaints or issues were raised for the one year period.

3.4 The applicant has also established a good track record of operating within the current permitted hours without issue. The applicant now wishes to seek a permanent extension of the operating hours, providing greater consistency and certainty for the future operation of the premises.

3.5 We would respectfully submit that the previous successful operation, together with the premises positive track record, demonstrates that the proposed extension can be accommodated responsibly and without adverse impact.

3.6 This application seeks to extend the permitted trading hours to allow the premises to operate until 00:00 hours (midnight) each day.

3.7 The premises has operated with a closing time of 18:30 hours since 2007 and to the applicants knowledge, this has not given rise to any complaints or identifiable issues in respect of the surrounding locality or the amenity of nearby residential properties.

3.8 The absence of any known adverse impacts associated with the premises operation until 18:30 hours is considered a positive indication of its relationship with the surrounding area. The application therefore seeks the Local Planning Authority's consideration of the proposed later closing time of midnight, having regard to the established operation of the premises, its relationship with

neighbouring residential properties and the potential impact of the extended hours on residential amenity.

3.9 The premises has the benefit of a licence to operate as an Adult Gaming Centre issued under section 164 of the Gambling 2005, which allows unrestricted operating hours with the exception that the premises should not open on Christmas Day. A copy of this licence is attached Appendix 4.

4. Planning history

4.1 The planning record shows that the permitted use of the premises as an Amusement Arcade / Adult Gaming Centre began around 1998, prior to this the premises operated as a retail unit.

4.2 An application was submitted in 2003 to renew the continued use of unit 14 to operate as an amusement arcade, originally permitted under permission WB/98/00888/FUL.

4.3 The decision for this application was issued on 25th November 2003 (Ref: 03/01173/FULL) which imposed a condition restricting the operating hours.

4.4 A further application was submitted in 2007 (07/1213/FULL) to amend Condition 2 of planning permission WB/03/1173/FULL relating to the opening hours, from 09:00 until 18:30 hours Mondays to Saturdays inclusive, revised to 09:00 until 22:00 hours daily.

5. Location

5.1 The site and premises consists of the ground floor AGC contained inside the Guildbourne Centre (shopping centre). It's frontage is contained within the ground floor courtyard of the shopping centre, with other retail units surrounding it.

5.2 The shopping centre hours for access to the main front entrance of the premises are currently Monday to Saturday 08:00 until 18:00 and Sundays 09:30 until 16:00.

5.3 Condition 2 attached to planning permission reference WB/07/1213/FULL dated 22nd November 2007 states that the rear door in the north elevation of the premises is to be used when the Guildbourne Centre is closed.

5.4 For the avoidance of doubt, a floor plan has been submitted in support of this application which clearly identifies the rear exit of the premises located on Chatsworth Road together with photographs and these can be found at Appendix 6.

5.5 The Guildbourne Centre forms the principal commercial and retail centre of the town and serves as a key focal point for local businesses, services and community activity within Worthing.

5.6 The area around the centre is characterised by a traditional mixed use town centre environment comprising ground floor retail and commercial premises with residential and offices above. The area accommodates a range of uses including shops, cafes, restaurants, financial and professional services together with independent businesses, contributing to an active and vibrant street scene throughout the day, evening and later hours.

5.7 Chatsworth Road at the rear of the premises, is predominantly commercial in character with a limited residential presence, thereby reducing the potential for disturbance to nearby residential properties. Furthermore, a police station is situated almost directly opposite the premises providing a notable level

of security and surveillance within the immediate vicinity.

5.8 The rear exit of the premises is used after 18:00 hours when the centre closes and this has been the practice since 2007. The established use of the rear exit together with the commercial character of the surrounding area and the presence of the police station provides relevant context when assessing the potential impact of the premises operation on the locality, including matters relating to security and residential amenity.

5.9 The Guildbourne Centre benefits from good pedestrian connectivity and accessibility, linking the town centre with surrounding neighbourhoods, public transport facilities and the seafront.

5.10 This application for later hours would be compatible with and complement the established evening and night time economy of the area. The proposal would contribute to the diversity of leisure and entertainment activities available within the area, supporting the town centre as an active destination beyond traditional daytime trading hours.

5.11 The surrounding area already accommodates a range of evening uses including pubs, restaurants, takeaways and other leisure based premises with remain operational into the evening period. Adult Gaming Centres represent a town centre leisure use that is consistent with the existing commercial character and function of the area.

5.12 The premises would not generate levels of noise, disturbance or activity materially different from other established late night venues within the immediate area. AGC's typically generate very little noise in comparison to other late night entertainment venues, such as pubs, bars and nightclubs.

5.13 The nature of the operation means there is limited noise generation associated with customer activity, music or entertainment and therefore the premises are unlikely to give rise to the same levels of noise or disturbance often associated with other late night uses.

5.14 Extending activity can contribute positively to natural surveillance, footfall and overall vitality and viability of the area.

6. Planning Policy

6.1 This application is prepared with regard to local and national planning policy, including the National Planning Policy Framework 2026 ("NPPF"), The Worthing Local Plan (2020 -2036) and other relevant documents.

6.2 The application seeks permission for the premises to remain open until midnight.

6.3 The proposal would not result in an increase in the floorspace of the premises, any external building works or a change in the nature of the established use as an Adult Gaming Centre. The principal consideration is therefore whether the additional hours of operation would result in any unacceptable impact upon neighbouring occupiers or the wider locality.

6.4 The proposed extension of opening hours to midnight should be considered in the context of the National Planning Policy Framework (NPPF) 2026, which recognises the importance of supporting the vitality and viability of town centres and encouraging their continued adaptation to changing economic and social circumstances.

6.5 Town centres benefit from a diverse range of commercial, leisure and entertainment uses that contribute to activity throughout the day and into the evening. In this context, permitting the continued operation of the established AGC until midnight would support the vitality of the town

centre by allowing an existing leisure use to serve customers during the later evening period, contributing to the diversity of the town centre offer and supporting the ongoing commercial viability of the premises.

6.6 The proposed extension of the opening hours of the AGC until midnight is considered to accord with the wider objectives of Policies SS3 and DM13 of the Worthing Local Plan which seek to support the vitality and viability of Worthing town centre and maintain its role as a destination for a diverse range of commercial, leisure and recreational activities.

6.7 Policy SS3 seeks to strengthen the town centre as a vibrant destination, whilst Policy DM13 supports the appropriate provision and functioning of town centre uses. In this context, the AGC represents an established leisure use that contributes to the diversity of activities available within the town centre. Extending its operating hours would enable the premises to serve customers during the evening and later into the night, supporting activity beyond traditional retail hours and contributing to the wider evening economy.

6.8 The proposal would therefore support the continued operation of an established leisure facility in a sustainable town centre location, consistent with the Local Plan's broader objectives of maintaining an active, diverse and economically resilient centre. The extension of opening hours until midnight would represent a reasonable continuation of the existing use and would not undermine the wider objectives of the Local Plan.

6.9 Policy DM22 seeks to ensure that development does not result in unacceptable levels of pollution, including noise and that appropriate mitigation measures are implemented where necessary to protect the amenity of neighbouring occupiers.

6.10 The principal consideration is whether the additional hours of operation would give rise to unacceptable noise or disturbance. The premises are situated within a town centre environment, where a degree of commercial and leisure activity is reasonably expected, particularly during the evening.

6.11 The premises have an established operating history during which time they have operated without issue or complaint in respect of noise or disturbance. This provides a useful indication that the existing operation has been capable of functioning without giving rise to identified amenity concerns.

6.12 Potential noise associated with customers entering and leaving the premises, voices and activity outside the entrance can be controlled through proportionate management measures, including the responsible management of customer arrivals and departures and the prevention of customers congregating outside the premises. These measures would help ensure that the extended operating hours do not result in unacceptable disturbance to nearby residents.

6.13 The proposal would be consistent with the objectives of Policy DM22 in that the additional hours would not give rise to unacceptable noise impacts.

6.14 The premises occupies an established commercial location within Worthing town centre. The continued operation of existing businesses is an important component of maintaining an active and viable town centre, providing services for customers and contributing to the diversity of commercial and leisure activities available locally.

6.15 The proposed extension to midnight would allow the Adult Gaming Centre to respond to demand during the later evening period and make continued use of an existing commercial unit. It would not introduce a new land use or require physical development. The proposal is therefore limited in scope and would retain the established function of the premises.

6.16 The Guildbourne Centre and the surrounding town centre area provide a commercial context in which activity during the evening is not unexpected. The proposed hours would allow the premises to operate until midnight, but would not in themselves change the nature of the use or necessarily result in an unacceptable impact upon the surrounding area.

6.17 The application should consequently be assessed on its individual merits, having regard to the likely environmental effects of the additional hours rather than treating the extension of opening hours as inherently unacceptable.

6.18 The premises has an established operating history, having traded in the area for many years. The operators report that they are not aware of any complaints or significant issues arising from the operation of the premises. This history provides relevant context when considering the relationship between the business and the surrounding locality.

6.19 It is acknowledged that the absence of known complaints does not, in itself, demonstrate that a later closing time would have no impact. Nevertheless, it is a relevant consideration alongside the established commercial character of the location, the nature of the use and the limited extent of the proposed change.

6.20 The application does not propose a change to the physical premises or the introduction of a materially different activity. The principal change would be the continuation of the existing use until midnight. Any potential impact would therefore be associated primarily with additional customer activity, arrivals and departures and the movement of people in the vicinity of the premises.

6.21 The acceptability of these effects should be considered in the context of the surrounding town centre environment. Subject to the existing operation being managed responsibly and any necessary measures being implemented to minimise noise and disturbance, it is considered that the proposed extension could be accommodated without unacceptable harm to residential amenity.

6.22 The proposal is consistent in principle with the objectives of Policies SS3, DM13 and DM22 provided the Local Planning Authority is satisfied that the additional hours would not result in significant adverse effects. The Council's own planning guidance recognises the importance of assessing noise impacts and, where necessary, identifying appropriate mitigation.

6.23 The rear exit is used after 18:00 hours and this has been the established practice since 2007. The area to the rear is predominantly commercial in character, with a limited residential presence. In addition, a police station is situated almost directly opposite the premises, contributing to the security context of the immediate area.

6.24 These circumstances are relevant to the assessment of the proposed extension, particularly in relation to the management of customer arrivals and departures during the later evening period. However, the presence of a police station should be regarded as contextual information rather than a substitute for appropriate management of the premises.

6.25 The applicant will continue to manage the premises responsibly, including taking reasonable steps to minimise noise when customers leave, prevent unnecessary loitering and ensure that the immediate surroundings remain orderly. Such measures would assist in limiting any potential disturbance associated with the extended opening hours.

7. Conclusion

7.1 In light of the above, we conclude that the proposed development is compliant with the key planning policies and should be supported.

7.2 This application and supporting documents show that the proposed extension of operating hours will have no adverse impact on the surrounding area or neighbouring amenities.

7.3 The hours being applied for under this application reflect the hours currently authorised and granted under the premises Licence issued by the Licensing Authority pursuant to section 164 of the Gambling Act 2005. A copy of this licence is attached at **Appendix 4** .

7.4 The proposed additional operating hours will ensure that the AGC remains a sustainable and successful business, thereby enabling continuing, stable and long-term investment in the premises, the business and its employees.

7.5 We conclude that the proposal to vary Condition 2 of permission WB/03/1173/FULL as amended by WB/07/11213/FULL to commence trading until midnight at the premises is acceptable both in terms of practice and policy.

8. Documents submitted in this application

8.1 This application submission comprises the following documents:

1. Application Form (auto generated via Planning Portal)
2. Covering Letter and Supporting Statement (this document)
3. Planning Decision reference: WB/07/11213/FULL
4. Gambling Act 2005 Premises Licence
5. Local Area Risk Assessment
6. Photographs of the rear of the premises

We conclude that the application is acceptable in respect of local planning policy and trust that the information provided here and in the attachments is sufficient for the validation and determination of the application.

If you wish to discuss this application or require any further information or documents, including where any adverse comments may be received from consultees, please do not hesitate to contact us directly.

Yours sincerely



Chris Rees-Gay
Woods Whur