

10 February 2026

Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

JC/Let/P7579

Dear Sir / Madam,

Full Planning Application for the erection of 2no. storage units at Land Adjacent to Kiosk 3, Beach Parade, Worthing, BN11 2FG.

We are writing to you on behalf of the applicant, **K66 Surf Division Limited** (hereafter referred to as K66), seeking planning permission for the erection of 2no. storage units to service operations by K66 at Kiosk 3, Beach Parade, Worthing. The proposal is required to provide essential additional storage to support the continued and expanded operation of an established watersports business on Worthing seafront.

This application has been submitted under Planning Portal reference **PP-13696112** and is accompanied by the following documents.

Application Form

This Covering Letter

Architectural Plans and Elevations

The Site

The site is located on the promenade on Worthing seafront, directly to the east of Kiosk 3 from which K66 operates. It lies within the built-up area boundary, approximately 1.3km from Worthing Railway Station, with the nearest bus stop located within 200 metres of the site.

Splashpoint Leisure Centre lies directly adjacent to the site, to the rear of the proposals when viewed from their main frontage along the promenade.

The site sits within an established leisure hub including several cafés, the leisure centre, Luna Hut Sauna, East Beach Studios, Worthing Rowing Club, Beach House Grounds, the SideOut volleyball courts, and the outdoor splashpad area.

This concentration of leisure and recreation uses establishes the promenade as a key destination for sport, health, and tourism activities.

Kiosk 3 is currently used by K66 as ancillary storage and administrative accommodation, facilitating the hire of watersports equipment and the provision of lessons taking place on the beach. The existing kiosk is constrained in terms of storage capacity, limiting the range of watersports that can be offered and restricting the ability of the business to operate on a year-round basis.

The site itself is currently an underutilised paved area contiguous with the promenade. The raised outdoor terrace of Splashpoint Leisure Centre lies to the east of the site, enclosed by an approximately 2-metre-high fence, with Kiosk 3 to the west. The promenade surface lies beyond the eastern and southern boundaries.

At this portion of the promenade, the total paved width varies between 8 and 10 metres, shared between pedestrians and cyclists.

The site lies within Flood Zone 3, meaning that there is a high risk of flooding from tidal or fluvial sources due to its beachside location.

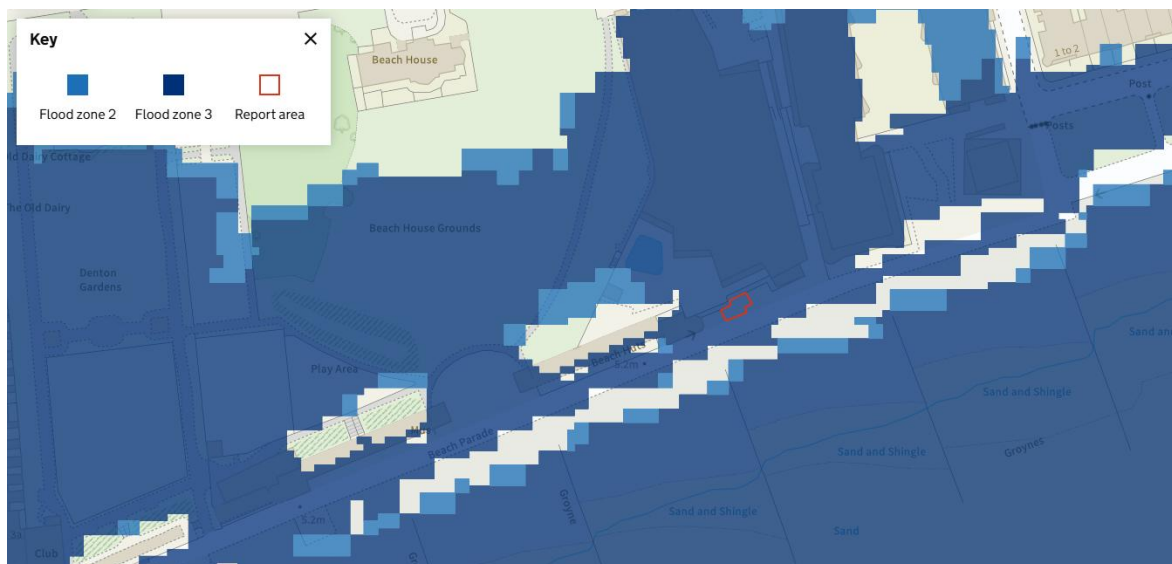


Figure 1 - Map of Flood Risk Zones Around the Site

The Proposal

This application proposes the erection of 2no. modest, ancillary storage units to the east of Kiosk 3, to provide additional storage space directly related to the existing watersports use. The units are required to support the expansion of activities beyond paddleboarding to include windsurfing, wing foiling, and associated instruction and equipment hire.

The storage units are of a simple cuboid form and are proposed to be clad in timber or other natural materials, with the potential for limited signage associated with the watersports school. This approach is intended to ensure that the units integrate sensitively with the established seafront character and surrounding leisure buildings.

The units measure approximately 2.6 metres in height, with a combined gross internal area of 21m². Their scale and positioning ensure that they remain clearly subservient to surrounding built form, including Splashpoint Leisure Centre.

The additional storage is essential to enable the business to operate throughout the year rather than on a purely seasonal basis. This supports the long-term viability of the business, helps address the high costs associated with a seafront lease, and allows Worthing to benefit from an enhanced and more resilient leisure offer outside the peak summer months.

Proposal Benefits

The proposal will deliver clear public and community benefits. The additional storage will allow the establishment of a more comprehensive watersports centre, offering equipment and lessons for users ranging from complete beginners to experienced participants. This will support local residents who may not have the means or ability to transport their own equipment, particularly those arriving by public transport, clearly enhancing the tourism offer of the town.

K66 also intends to develop a Watersports Club associated with the kiosk, providing discounted hire and lessons, opportunities for community engagement, and a focal point for like-minded individuals to connect around shared sporting interests. This would add to the activity on the promenade established by the seafront strategy that has been implemented by the Council.

In addition, the applicant proposes to run safety and water awareness courses, with aspirations to establish a Surf Life Saving Club for children. These initiatives will contribute positively to public safety, health, and wellbeing along Worthing seafront.

Planning History

The following represents the relevant planning history for the site:

10/0489/WBR3 - Application under Regulation 3 for the construction of new swimming and health and fitness facilities for the public of Worthing. The facilities will include a cafe, competition pool, diving/learner pool, leisure pools with wet changing areas, a health and fitness suite with dry changing facilities, and flexible studio spaces and ancillary support spaces, provision of additional 72 surface car parking spaces and alterations to access. (Approved 14 October 2010).

The approval of the above application may be considered the catalyst for the wider transformation of this portion of Worthing seafront, and alongside the heritage structures in the area forms the main built form context for the site.

AWDM/1227/13 - Change of use of existing vacant kiosk to form a retail unit for water sports activities and use of part of beach for decked seating area. (Approved 8 November 2013).

Approval of the above application first enabled water sports activities in this area of the beach to be supported by dedicated facilities. This application seeks to further this use with greater storage space for equipment.

The following applications detail works over the years to improve and enliven this part of Worthing seafront.

AWDM/0722/25 - Replacement of the existing facades to beach huts and kiosks. (Approved 23 September 2025).

AWDM/0944/13 - Change of use of beach chalets 32-41 to arts and crafts workshop with ancillary retail and permanent planning permission for the continued use of chalets 42 - 46 as arts and crafts workshop with ancillary retail. Installation of folding arm awnings to all chalets and removal of front tubular railings. (Approved 20 December 2013).

09/0362/FULL - Application to hold a weekly arts market on the raised walkway Beach Parade with maximum of 22 stalls on Sundays only, opening from 11 am and closing at 4 pm, operating from the last Sunday in June to the last Sunday in September. (6 August 2009)

Planning Appraisal

This section of the Statement assesses the proposed development against the relevant development plan policies and other material considerations. Having regard to the nature, scale, and location of the proposal, the following are identified as the principal planning considerations in the determination of this application:

- The principle of development
- Design, form, and appearance
- Impact on heritage assets
- Tourism, leisure, and community benefits
- Flood risk
- Amenity and public safety considerations

Each of these matters is considered in turn below, and it is demonstrated that the proposed development accords with the development plan when read as a whole and is supported by other material considerations.

The Principle of Development

The site is located within the Built-up Area Boundary of Worthing where development is supported in principle.

The proposed use of the development should be considered an ancillary extension of leisure use currently operating from Kisok 3. It may therefore be considered to be supporting leisure use. Within the Worthing Local Plan (2023), Policy DM10 explicitly supports “*the development of tourism, leisure, sporting and creative industries with particular emphasis on the town centre and seafront locations*”. The site, located directly adjacent to the beach on the promenade, is a seafront location. It also lies directly within an established area of tourism, sport, and leisure provision, within which the proposed use is entirely consistent.

Furthermore, this portion of the seafront has been explicitly identified for the development of leisure and tourism facilities within the Worthing Seafront Investment Plan (2018).

The second part of the Vision of the Local Plan specifically references the seafront as a location for developing vibrant leisure offer as follows:

V2 Regeneration of the town centre and seafront will have built on recent successes to unlock key development sites and deliver a vibrant and diverse retail, cultural and leisure offer for residents and visitors of all ages.

It can therefore be concluded that the development, designed to support sport and leisure uses on worthing seafront, should be accepted in principle in this location.

Design Form and Appearance

Situated adjacent to Splashpoint Leisure Centre, it is acknowledged that the proposals must remain subservient to the architectural integrity of it's neighbour.

While the original design of Splashpoint included a seafront terrace with glass balustrade for uninterrupted views, the current situation has adapted this to better meet the requirements of the current tenant-operator. Luna Hut Sauna, who have had control of the terrace for their operations for some time, have adapted the terrace area to allow for sauna operations. The balustrade in this area is no longer glazed but is fully obscured.



Figure 2: Obscured Balustrading to Splashpoint

The proposal, of a height of 2.6 metres, will not significantly impact the visual amenity of the user of the terrace. Furthermore, the proposed massing is of limited scale as seen from the promenade. The limited height and positioning against the obscured fence significantly reduce the visual impact of the proposals (refer to Figure 3).

The choice of materials is also contextually appropriate. The units are to be clad in timber panelling on all sides. This takes cues from the material palette of the surrounding area, particularly the side elevations of the leisure centre and the nearby café building, Perch on the Parade. Timber is considered to be an appropriate design response to the coastal environment.

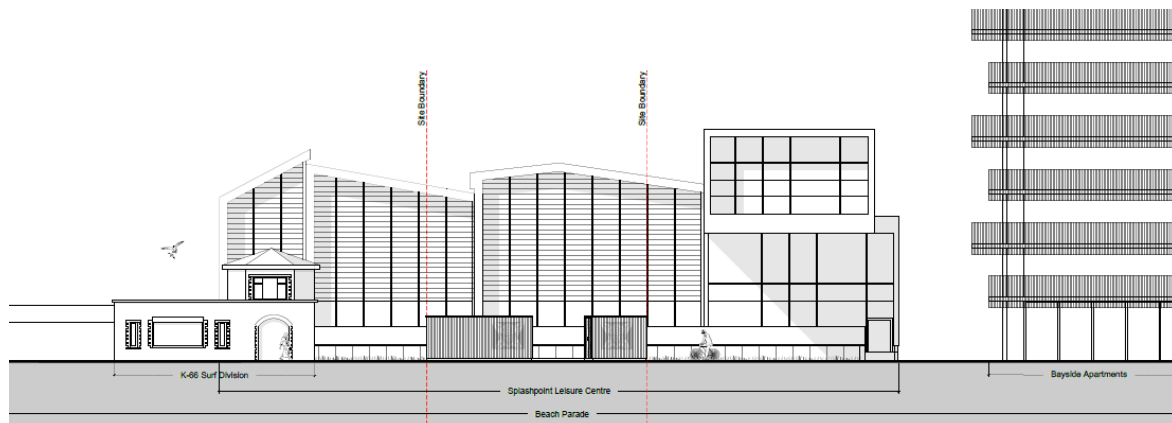


Figure 3: Proposed Street Scene

The proposal has been located to ensure there will be no impact on the promenade area as demonstrated in Figure 4. The proposal has also been careful to avoid an existing manhole (again demonstrated within Figure 4). A bin, as shown in figure 2 will likely require relocating and this can be secured through an appropriately worded condition.

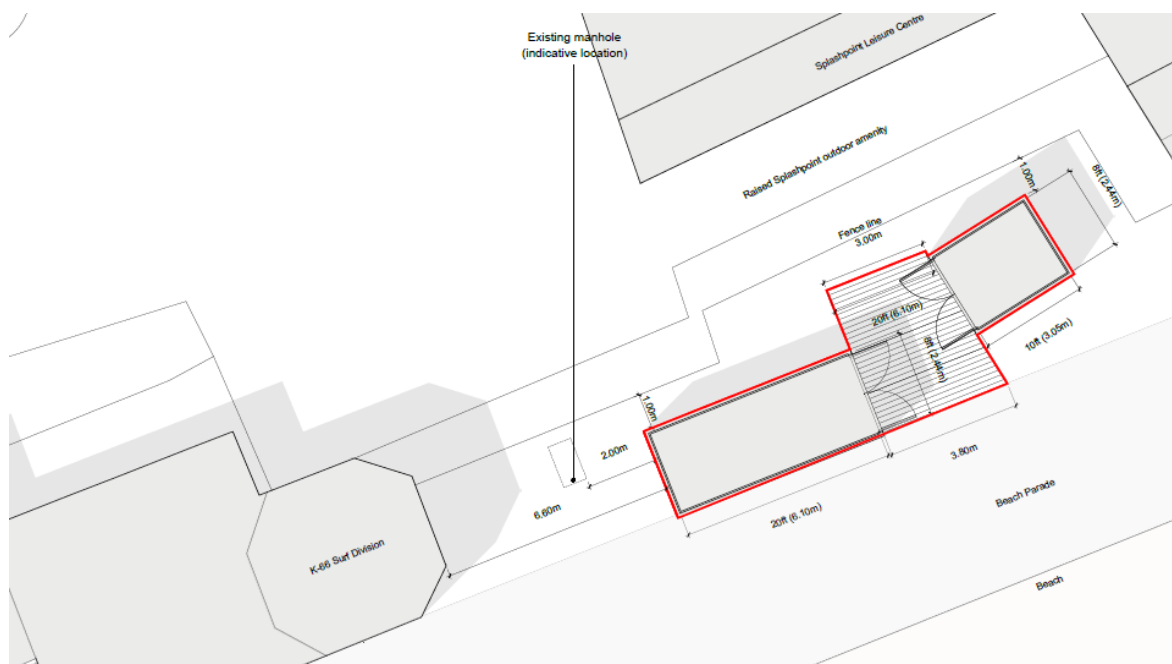


Figure 4: Site Plan

In design terms, we consider the proposal to be acceptable.

Heritage

While the site does not directly involve any designated heritage assets, it does lie within the setting of the Steyne Gardens Conservation Area, located to the west of the site. It is not considered to be within the setting of the Grade II* Listed Beach House (Historic England ref. 1025808) given the intervening development and distance nor the locally listed Beach House Grounds.

The existing setting of these assets, specifically along the promenade, is currently dominated by contemporary development. The adjacent Spashpoint Leisure Centre and Bayside Development have in recent years introduced a new design language and material palette that sits comfortably alongside the existing heritage assets.

Due to the similar use of materials to this contemporary development, appropriate design for the beachfront location, and small scale, the proposals are therefore considered to amount to no harm to the heritage value of Steyne Gardens Conservation Area. The Steyne Gardens Conservation Area Appraisal identifies Important Views – none of these views will be impacted by the development.

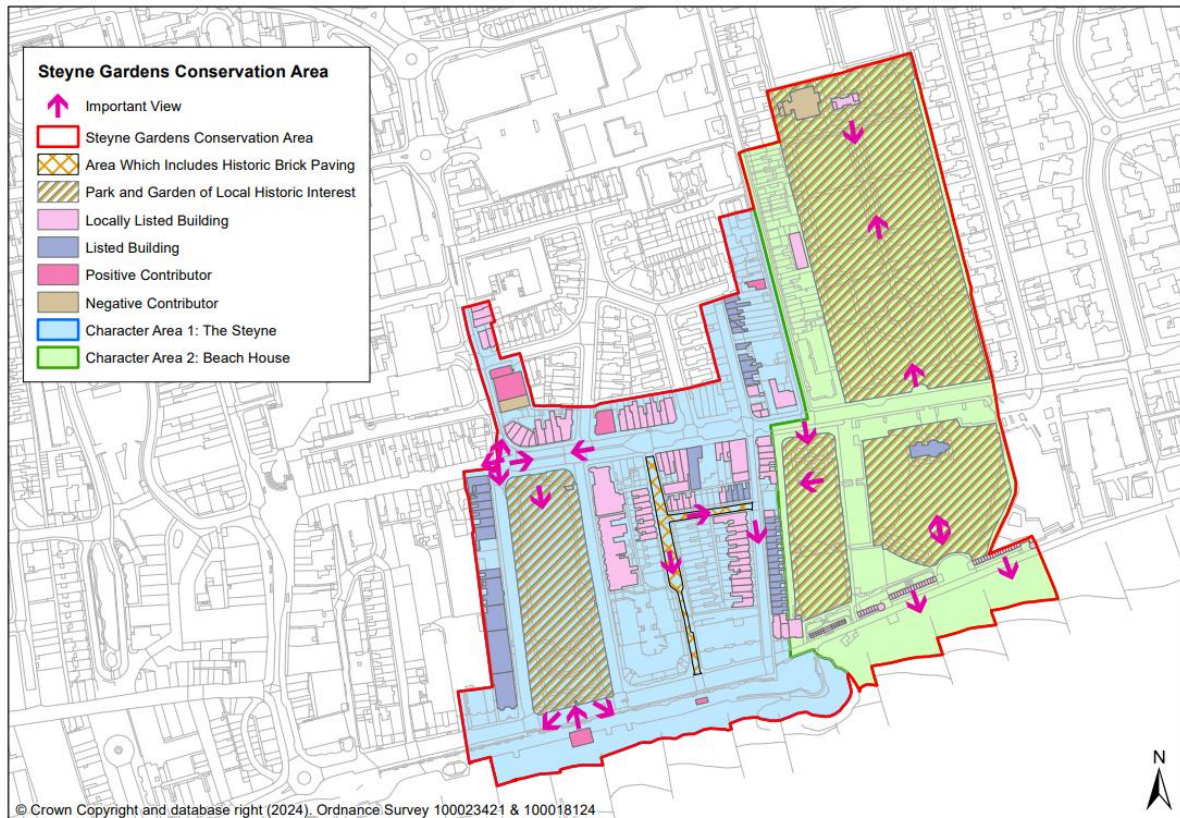


Figure 5: Steyne Gardens Conservation Area Character Appraisal

If the council are of the opinion that the development would result in harm, we assert that this should be deemed on the lower end of the scale of less than substantial harm. Any perceived harm would need to be considered against the benefits of the proposal, which would clearly outweigh any such concerns. The development is entirely consistent with its setting, not marking any significant departure from established patterns of design in the area.

The development should therefore be considered to be entirely acceptable on heritage grounds, especially when taken on balance against all the benefits it will bring to the area.

Tourism and Leisure

The proposed development will deliver clear and demonstrable benefits to Worthing's tourism, leisure, and visitor economy, fully aligned with the strategic objectives and spatial strategy of the Worthing Local Plan.

While the site does not fall within the defined Town Centre boundary, it is located in close proximity to the town centre and forms part of the continuous seafront environment that functions as one of Worthing's principal leisure and visitor destinations. In spatial and functional terms, the site operates as an extension of the town centre leisure offer, with strong pedestrian and cycle connections and an established relationship with nearby cultural, recreational, and visitor attractions (including the leisure hub consisting of the swimming pool, volley ball court and open space at Beach House and calisthenics area located further to the east).

The Local Plan identifies the seafront as a key focus for active, vibrant, and high-quality leisure uses, recognising its importance in supporting Worthing's tourism role and wider economic vitality. Strategic Objectives 10 and 12 seek to strengthen leisure, cultural, and tourism provision through the enhancement of existing facilities and the delivery of development that improves the overall offer for residents and visitors.

In this context, the proposal represents a highly effective intervention that directly supports these objectives. By enabling the expansion of an established watersports operation, the development will diversify the range of activities available on the seafront, introducing additional water-based sports such as windsurfing and wing foiling alongside existing provision. This will broaden the appeal of the seafront to a wider range of users and support Worthing's role as a destination for active recreation.

Importantly, the additional storage capacity will facilitate year-round operation, moving beyond a purely seasonal offer. This directly supports the Spatial Strategy ambition to encourage people to stay and dwell, strengthening the visitor economy and contributing to activity levels throughout the year. Increased footfall associated with a more resilient leisure use will also support surrounding businesses and reinforce the vitality of the seafront as a destination in its own right.

The proposal will also deliver meaningful community benefits, including improved access to sport and recreation for local residents, opportunities for structured tuition and equipment hire, and the potential establishment of a watersports club. These elements align with the Local Plan's objectives to improve leisure and community provision and promote healthy, active lifestyles.

Policy DM10 explicitly supports the development of tourism, leisure, sporting, and creative industries, with particular emphasis on seafront locations. The proposal sits squarely within this policy intent, representing leisure-led development that is appropriately located, proportionate in scale, and closely related to an established use.

Furthermore, the proposal does not result in the loss of valued open space or existing recreational facilities. Instead, it enhances the recreational function of the seafront in accordance with Policy DM7, delivering improved sports provision that clearly outweighs any limited change to the use of the promenade space.

Overall, the proposal will strengthen Worthing's leisure and tourism offer, supporting the Council's ambitions for a vibrant, active seafront that complements the town centre and contributes positively to the wider visitor economy. The benefits associated with the development weigh significantly in favour of the proposal and demonstrate strong compliance with the development plan when read as a whole.

Flood Risk

As previously identified, the site is situated in Flood Zone 3b (functional floodplain), meaning there is a high probability of flooding, predominantly from tidal sources due to its coastal location.

However, it should be noted that the proposed use is appropriate within Flood Zone 3b. Annex 3 of the NPPF sets out the categories of development that are considered water-compatible, which include "water-based recreation (excluding sleeping accommodation)".

The development would fall within this category. The proposed storage units are directly ancillary to an established watersports use, which is inherently water-based and coastal in nature. No staff are to be permanently stationed within the development, and the units will not include any sleeping accommodation. The watersports equipment proposed to be stored within the units is not considered particularly vulnerable to flood damage.

Planning Practice Guidance elaborates on the requirements for water-compatible development within Flood Zone 3b. It states that such development should be designed and constructed to:

'In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- *remain operational and safe for users in times of flood;*
- *result in no net loss of floodplain storage;*
- *not impede water flows and not increase flood risk elsewhere.'*

The development is not anticipated to be used in times of flooding. As no persons are to sleep within the units, and the watersports school and hire facilities are expected to cease operation during periods of severe weather or forecast flood events, the proposal is not considered to present a danger to life. Furthermore, flooding is unlikely to materially affect the function of the development, given that the units are used solely for storage and contain robust watersports equipment designed for use in marine environments.

The proposed storage units are small in scale, lightweight, and located on existing hardstanding. As such, the development will result in no net loss of floodplain storage, will not noticeably impede the flow of tidal floodwater, and will not increase flood risk elsewhere. The proposal will not introduce additional impermeable surfacing and will therefore result in no increase in surface water runoff.

As such, the effects of flooding on the proposed use are expected to be minimal and manageable, and the proposal fully accords with national guidance for water-compatible development within Flood Zone 3b. The site is therefore considered an appropriate location for the development proposed.

The development should therefore be considered acceptable in flood risk terms.

Conclusion

In summary, the proposed erection of 2no. ancillary storage units adjacent to Kiosk 3 represents a modest, well-considered, and policy-compliant form of development that will directly support the continued operation and expansion of an established watersports business on Worthing seafront. The principle of development is firmly supported by the development plan, national guidance, and the Council's long-standing strategy to enhance leisure and tourism uses along the seafront.

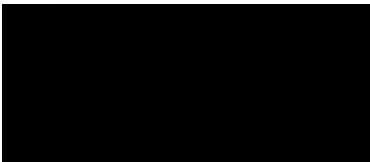
The proposal has been carefully designed to remain subservient in scale, to integrate sensitively with its coastal context, and to avoid any adverse impacts on visual amenity, heritage assets, public safety, or the functioning of the promenade. The development is water-compatible in nature and is entirely appropriate within Flood Zone 3b, with no increased flood risk or loss of floodplain capacity arising.

Importantly, the proposal will deliver clear public benefits, including enhanced leisure provision, improved access to watersports for residents and visitors, opportunities for year-round activity, and positive contributions to health, wellbeing, tourism, and the local economy. These benefits align closely with the objectives of the Worthing Local Plan and the Council's vision for a vibrant, active, and resilient seafront.

When considered as a whole, the development accords with the development plan and is supported by material considerations. Planning permission should therefore be granted.

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

Yours sincerely
ECE Planning



Sam Sykes MRTPI
Director