

MME PLANNING SERVICES

Proposed demolition of existing buildings and construction of a three-storey building comprising 27no 1-bed apartments, with associated internal communal areas, secure cycle and bin storage, and hard and soft landscaping.

at

10-20, Marine Place, Worthing, West Sussex,
BN11 3DN

Planning and Affordable Housing Statement

Ref: P-081

August 2026

Version 2

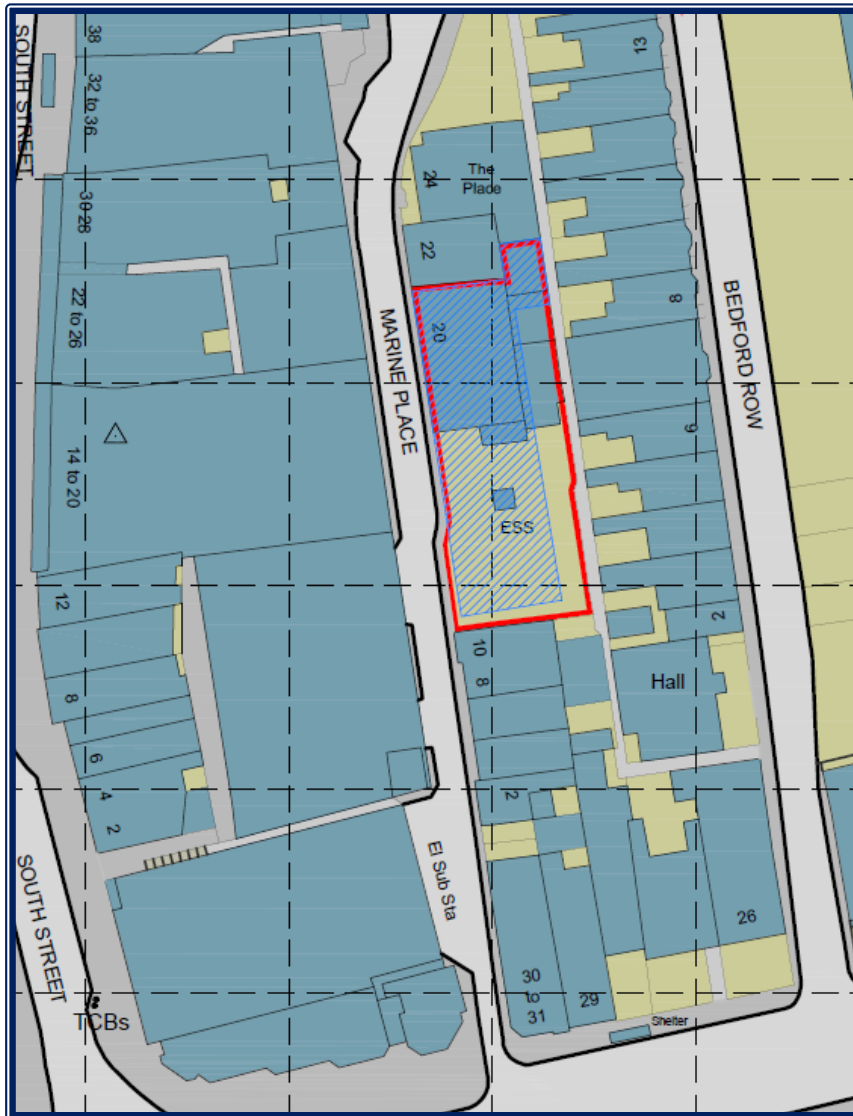


Figure 1: Site Location

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1. Introduction

- 1.1 MME Planning Services is instructed to prepare this full planning application for the demolition of the existing buildings on site and construction of a three-storey building comprising 27 1-bed apartments, with associated internal communal areas, secure cycle and bin storage, and hard and soft landscaping at 10-20, Marine Place, Worthing, West Sussex, BN11 3DN.
- 1.2 This statement sets out the proposed scheme in detail with regard to the following aspects: the planning history of the site, the development proposals, the planning merits of the scheme, and how the proposals comply with the Council's policies.
- 1.3 This application is submitted following approval of a similar scheme on the site in April 2023 under planning reference AWDM/1884/22. The site has since changed hands and is now owned by the developer responsible for the former Debenhams site on the opposite side of Marine Place, which is currently being developed following the granting of planning permission in December 2023 under planning reference AWDM/1906/22.

2. Site, Surroundings and Background

- 2.1 The application site comprises the former Debenhams department store service yard, parking area and storage / warehouse buildings, located on the eastern side of Marine Place, within the town centre of Worthing. The site is located within the South Street Conservation Area and Environment Agency (EA) Flood Zone 3. The surrounding area comprises a mix of commercial and residential properties.
- 2.2 There is a row of Grade II listed buildings located to the east of the site along Bedford Row, and planning permission has been granted on the opposite side of Marine Place for a mixed residential and commercial development under planning reference AWDM/1096/22 in December 2023. The site is located in close proximity to the seafront and Worthing Pier to the south.
- 2.3 The site is surrounded by a mix of architectural styles and forms from different periods. There are a number of art deco / rendered facades which are in keeping with a seafront location, including that of the former Debenhams building to the west of the application site.

- 2.4 Pre-application discussions have taken place between the applicant and the Council with a formal pre-application submitted in July 2025 under reference PREAPP/0097/25. The initial pre-application submission was in relation to a very similar development forming Co-Living accommodation. While no formal response has been received from the Council, following further discussions and consideration of the development, a fully residential (flatted) scheme was considered to be the most suitable development for the site, details of which will be set out within this statement.

3. Planning History

- 3.1 Planning Application – Ref: AWDM/1884/22 – Description: Demolition of existing commercial storage buildings, erection of new 3-storey building containing 9 apartments, with additional studio / office space at lower ground floor level. To include on-site secure bicycle and refuse storage, and the relocation of an existing electrical substation – Decision: Approved, April 2023.

4. Proposals

- 4.1 As detailed above, planning permission is sought for the demolition of the existing buildings on site and erection of a three-storey building containing 27 1-bed apartments. The proposals would closely reflect the design, scale and layout of the previous approval on site, under planning reference AWDM/1884/22, as well as the architectural features of surrounding buildings, in particular that of the former Debenhams building.
- 4.2 It is noted that this application is a continuation of the applicant's masterplan approach for the regeneration and redevelopment of the former Debenhams sites within Marine Place, which has previously received support from the Council.
- 4.3 Similar to the previous approval, there would be a break between the first and second floor levels with a parapet wall and roof terraces serving the second floor apartments, reducing the overall scale of the proposed building and breaking up the elevations.
- 4.4 Neighbouring amenity has been considered regarding overlooking, particularly of properties along Bedford Row. The proposals incorporate obscure glazing to the lower parts of the upper-floor windows.

4.5 In addition to the above, it is important to highlight that the overall height of the building, as detailed within the submitted plans, would be lower than that of the previously approved scheme. This would reduce potential overbearing impacts on neighbouring properties. The previously approved scheme is shown outlined in red on the proposed elevation plans and at Figure 2 below.

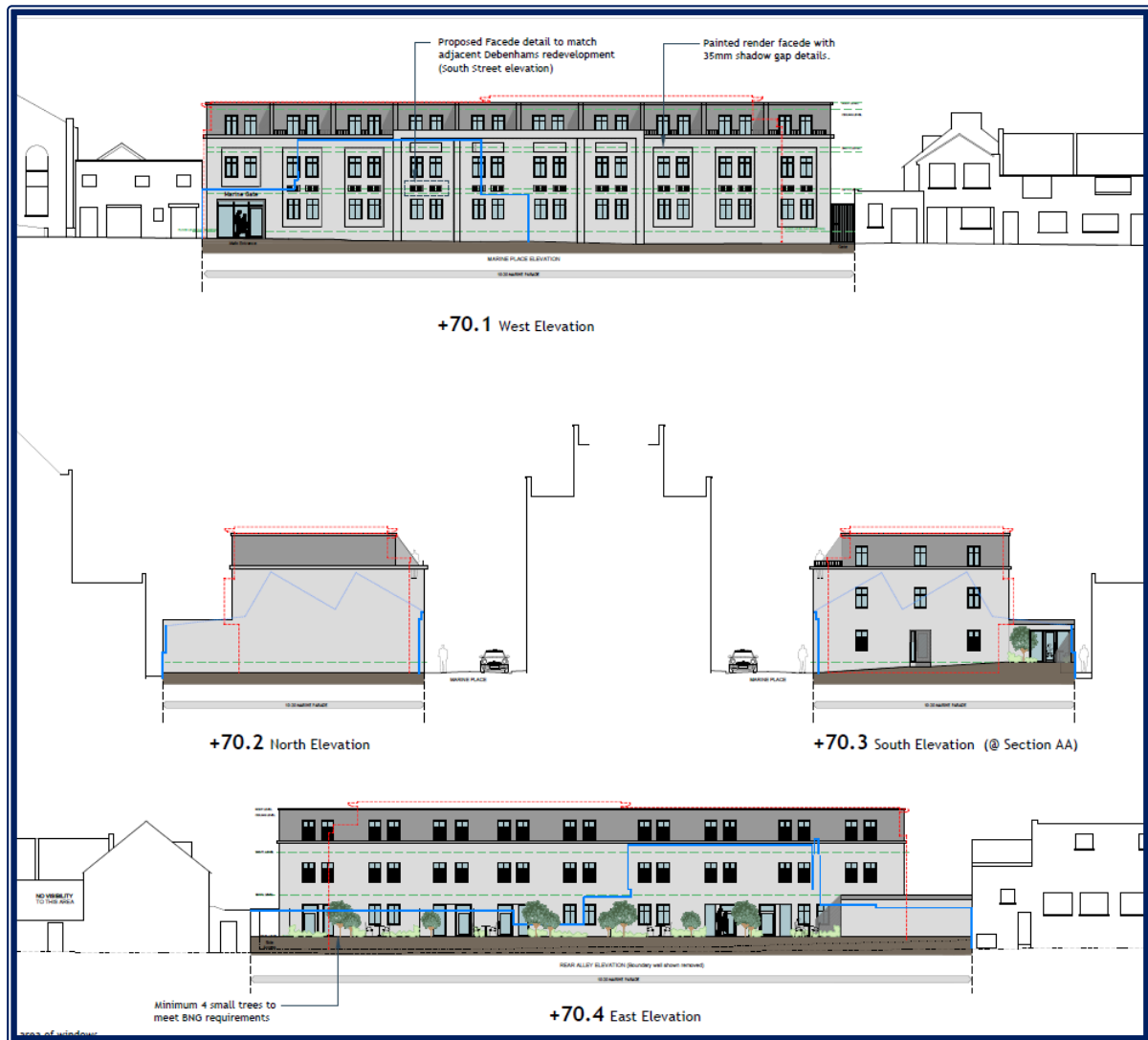


Figure 2: Proposed Elevations

4.6 External materials consist predominantly of render to the external walls, which again would replicate the existing former Debenhams building. The submitted plans show the detailing to the external elevations, particularly the western elevation facing Marine Place, in order to provide a building of visual interest, with the second floor consisting of varying materials.

- 4.7 The proposals also incorporate appropriate cycle, refuse and recycling storage on site, as well as ecological enhancements and a measurable Biodiversity Net Gain (BNG). Given the nature of the proposals, the context of the site and taking into account the previous approval, there would be no detrimental impact on the character of the surrounding Conservation Area or the make-up of the street scene.
- 4.8 It is noted that the previous approval on site incorporated an overall occupancy rate of 43no people, with the addition of the basement creating additional usage to the building, as well as trips to and from the site. The proposals would result in a marked decrease in this, with a total occupancy rate of 27no people.

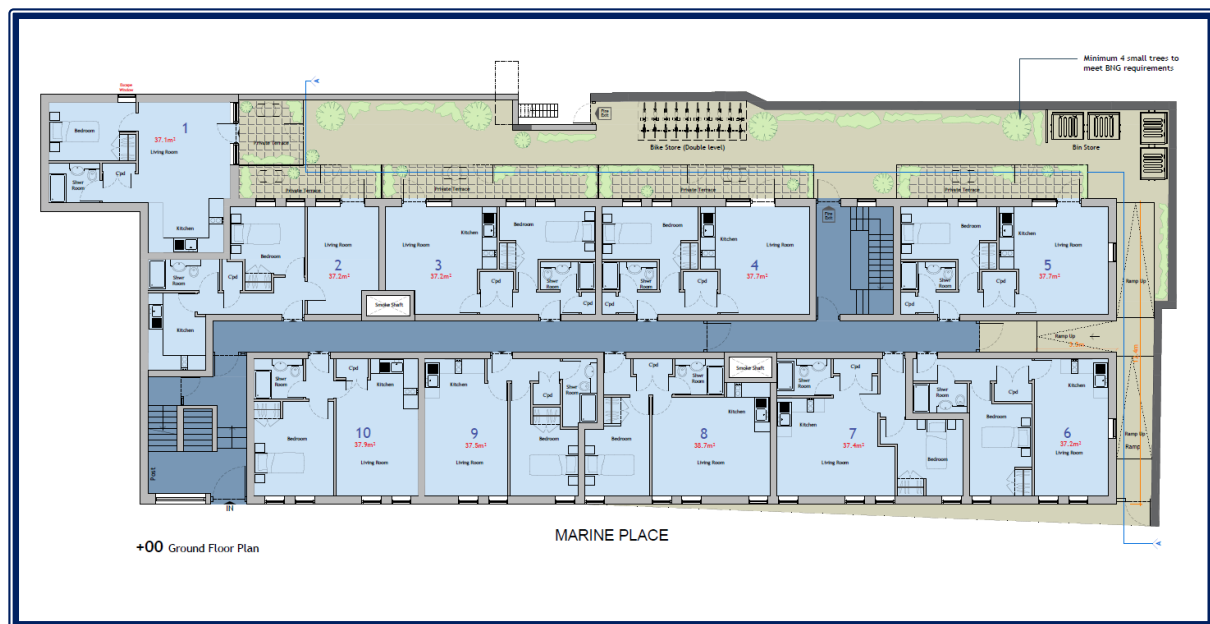


Figure 3: Proposed Ground Floor Plan / Layout Plan

5. Planning Policy

National Planning Policy Framework (NPPF) (2026) and National Guidance

- 5.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole.
- 5.2 Running throughout the NPPF is a presumption in favour of sustainable development. Sustainable development is achieved through three main objectives: economic, social and environmental.

- 5.3 Policy S3 of the NPPF establishes the presumption in favour of sustainable development and development proposals that accord with both an up-to-date development plan and the decision-making policies in the NPPF should be approved without delay. Where the development proposal is located within a settlement, Policy S4 of the NPPF provides that development should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies in the Framework.

Worthing Local Plan (WLP) (2023)

- 5.4 The NPPF also requires local planning authorities to maintain an effective and up-to-date development plan. Policy PM2 sets out the framework for the preparation and review of local plans and spatial strategies and that preparation of a new local plan must be commenced no later than five years after adoption of the current plan. The Worthing Local Plan (WLP) was adopted in March 2023 and is therefore considered to be up-to-date and the most relevant policy document in considering this application.

- 5.5 The main WLP policies relevant to this application are as follows:

- SP1 - Presumption in favour of sustainable development
- SP2 - Climate change
- SP3 - Healthy communities
- SS1 - Spatial strategy
- SS3 - Town Centre
- DM1 - Housing mix
- DM2 - Density
- DM3 - Affordable housing
- DM5 - Quality of the built environment
- DM6 - Public realm
- DM7 - Open space, recreation & leisure
- DM8 - Planning for sustainable communities / community facilities
- DM10 - Economic Growth and Skills
- DM12 - The visitor economy
- DM13 - Retail and town centre uses
- DM15 - Sustainable transport and active travel
- DM16 - Sustainable design
- DM17 - Energy
- DM18 - Biodiversity

- DM19 - Green infrastructure
- DM20 - Flood Risk
- DM21 - Water quality and sustainable water use
- DM22 - Pollution
- DM23 - Strategic Approach to the historic environment
- DM24 - The Historic Environment

Supplementary Planning Documents (SPDs)

5.6 Relevant SPDs to this application are as follows:

- Supplementary Planning Document 'Space Standards' (WBC 2012)
- Supplementary Planning Document 'Sustainable Economy' (WBC 2012)
- 'Infrastructure Delivery Plan' (WBC 2010)
- Worthing Open Space Strategy and Off Site Calculator
- Worthing Green Infrastructure and Biodiversity SPD (2026)

6. Planning Considerations

Principle of Development

6.1 Policy L2 (Making effective use of land) of the new NPPF 2026 states that: "Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:

b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required)".

6.2 This new policy specifically supports the reuse of brownfield and previously developed land and urban intensification. As set out above, the site comprises the former Debenhams department store service yard, parking area and storage / warehouse buildings. The proposal is precisely the type of development that the new national policy seeks to encourage: the redevelopment and intensification of a previously developed site within an established town centre to provide additional housing without having to develop greenfield sites.

- 6.3 Policy SS1 of the Local plan requires high quality development that provides for the needs of local communities. It states that development will be permitted within the built up area boundary, subject to compliance with other policies in the Local Plan. Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area.
- 6.4 Policy SS3 of the Local Plan deals with development in Worthing Town Centre, seeking to direct retail, leisure and office use to the Town Centre, improving and increasing the mix of uses in the Town Centre, particularly retail, employment and residential uses through making efficient use of existing sites. Policy DM13 requires the Council to support the vitality and viability of Worthing's town centres, with changes of use and redevelopments within town centres being carefully controlled to ensure that they support the successful functioning of the centres and their ability to meet local needs.
- 6.5 As set out above, the principle of a residential use has already been established on the site under the previously approved application, reference number AWD/1884/22, which proposed 9 no larger dwellings. While this previous approval also included commercial space at basement level, the Council has confirmed that the principle of residential development at ground floor level in this location is acceptable.
- 6.6 As detailed under Section 2 of this statement, the applicant's initial intentions for the site was to erect an identical building for use as Co-Living accommodation. However, following pre-application discussions with the Council and concerns raised about the type and standard of accommodation to be provided, a more conventional residential (flatted) scheme has been developed. The applicant has also engaged with three local estate agents regarding the demand for co-living accommodation. Their feedback indicated that conventional residential units were considered more appropriate to the local market and more likely to be sought after in Worthing
- 6.7 The previously permitted basement has been omitted from this current proposal due to viability concerns. A detailed viability statement is provided with this application which clearly sets out the cost implications of the basement and the overall build costs, showing that the development would not be viable and that a basement would add significant costs.

- 6.8 Furthermore, it has been considered that the creation of a basement in this constrained town centre location would cause significant and undue disruption to existing neighbouring properties, beyond the expected disruption during construction, including increased noise and disturbance and likely temporary closure of Marine Place to allow for the construction works. The applicant intends to complete the build within the shortest timeframe possible. The provision of a basement, given the nature of the operations requirement for this, would significantly extend this timeframe and would result in significant additional disruption and impact upon neighbouring properties.
- 6.9 As previously established, the site is amongst the most suitable in Worthing for intensive development given its central town centre location close to shops, services and public transport links. The close proximity to the seafront adds to the suitability of the site for residential development creating a desirable and sought after location to live. The proposed density of approximately 386 dwellings per hectare represents an efficient use of this town-centre brownfield site. This is consistent with the objectives of Policy DM2, which supports higher densities in excess of 100 dwellings per hectare for flatted development and development within the town centre and locations close to public transport interchanges and services. Notwithstanding this, while the number of units would be higher when compared to the previously approved scheme, the occupancy rate would be significantly lower.
- 6.10 While it is acknowledged that the proposal would result in the loss of this employment site, it is evident that the proposed redevelopment of the site would introduce an alternative use where the benefits would significantly outweigh the loss. These benefits include a more optimal use of the site, the provision of a building of architectural merit and enhancement to the site overall compared to the existing situation.
- 6.11 Overall, the proposal would make good use of a vacant and underutilised site in a highly sustainable location and would not represent a marked increase or raise any issue in terms of capacity or strain on the services to be provided on site or within the surrounding areas. The increase in the quantum of residential units in this area makes a positive contribution towards the continued delivery of the Borough's adopted housing requirement. The proposal would therefore accord with the aims of the WLP with regard to development in Worthing Town Centre and would be acceptable in principle.

Sustainability

- 6.12 Policy SP2 of the Local Plan requires development to reduce the amount of energy used in construction and operation of buildings and improve energy efficiency, including retrofitting existing properties, to contribute to achieving zero carbon emissions, prioritise active travel such as walking, cycling and public transport to reduce reliance on the private car and facilitate car free lifestyles.
- 6.13 Policy DM16 requires that all new build housing will achieve a minimum 20% CO2 reduction compared to the Building Regulations Part L 2013 standard through energy efficiency measures, unless superseded by national policy or Building Regulations.
- 6.14 This application is supported by a detailed energy statement, including details of the heat network, which sets out that the proposals would achieve the required 20% reduction, through the incorporation of energy-efficient building design and systems to ensure that the proposals are a highly sustainable form of development. As set out above, the site is also located within a highly sustainable town centre location.

Housing Mix

- 6.15 Policy DM1 of the Local Plan requires that, in order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up-to-date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site.
- 6.16 The proposal is characterised by 1-bed units to maximise the potential of the site within this highly sustainable, town centre location and close to Worthing seafront. While the previously approved scheme on the site provided larger units, given the constrained nature of the site, its town-centre location and the limited availability of external amenity space, smaller units are considered to represent the most appropriate form of residential accommodation.
- 6.17 The proposals would provide accommodation for single people; older residents wishing to downsize; people seeking to live independently and people requiring smaller, more accessible accommodation. As such, the proposals are considered to accord with Policy DM1.

Affordable Housing

- 6.18 Policy DM3 of the Local Plan states that new residential development on previously developed land involving the development of 10 or more flats will lead to a requirement for 20% affordable housing. However, where a developer states that exceptional development costs mean it is not possible to meet the full requirements for the delivery of affordable housing the onus will be on them to demonstrate this to the Council and this must be supported by robust financial viability evidence. As set out above, this application is supported by a robust viability statement which demonstrates that the development is 'non-viable', even with no on-site affordable housing provided.
- 6.19 Notwithstanding this, the applicant is happy to make a contribution of £55,000 and would be happy to enter into a S106 agreement to secure this and for the Council to decide how these monies are used. In addition, the applicant is committed to investing in Worthing, and is making a minimal profit in order to support the Town Centre.

Design and Appearance

- 6.20 Policy L3 (Achieving appropriate densities) of the new NPPF 2026 states that: "To contribute to making efficient use of land:
- a. Within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated. The only exception is where there is a clear justification that this is either inappropriate or not possible (for example, where the prevailing density is already very high, the nature of the accommodation required precludes higher densities, or where it would conflict with other policies in this Framework). In considering the potential to increase densities, the existing character of an area should be taken into account, in accordance with policy DP3, but should not preclude development which makes the most of an area's potential". This new national policy positively supports appropriate urban intensification and efficient use of land.
- 6.21 Policy DP3 (Key principles for well-designed places) of the new NPPF 2026 states that: "Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets.

This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3”.

- 6.22 Policy DM2 of the Local Plan supports higher densities, in excess of 100 dwellings per hectare in mixed use developments, flatted developments and developments located in the town centre and in areas close to public transport interchanges and services.
- 6.23 Policy DM5 of the adopted Local Plan requires that all new development should be of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area.
- 6.24 Policy DM23 of the Local Plan requires the Council to conserve and enhance the historic environment and character of Worthing, which includes historic areas, buildings, features, archaeological assets and their settings, important views and relationships between settlements and landscapes / seascapes.
- 6.25 As set out above, the proposed design of the building would take its cues from the previously approved scheme in terms of its overall appearance and form, however would be marginally lower in terms of overall height. This would serve to reduce the overall presence of the proposed building within Marine Place.
- 6.26 The predominant use of render to external façade of the building is considered to be highly appropriate in this location, matching existing examples within the immediate vicinity. The overall scale and form of the proposal has been informed by the previous approval, neighbouring development as well as the current daylight and sunlight analysis which accompanies this application. The submitted drawings and CGIs show how the proposal fits appropriately within the street scene, which comprises a mixture of buildings, both in terms of appearance and form, as well as overall height and scale. The overall form of the building is restrained, with the second floor set back from the frontage with differing external materials, and provision of the proposed terraces breaking up the appearance and presence of the building and reducing its massing within the street scene.
- 6.27 The proposals would result in a density of approximately 386 dwellings per hectare. This represents an efficient and intensive use of a constrained brownfield site within Worthing town centre and is consistent with the objectives of Policy DM2, which supports higher densities in excess of 100 dwellings per hectare for flatted development and development within town-centre locations.

- 6.28 The proposal also accords with the approach to increasing density within settlements established by NPPF 2026 Policy L3, subject to the design-led assessment of scale, character, amenity and other relevant planning considerations.
- 6.29 The combination of the brownfield site, the appropriate density supported by national and local policy, within this highly sustainable, central location and the high-quality design, all ensure that the proposals are appropriate in this setting, in accordance with the above policies.
- 6.30 Overall, given the context of Marine Place, which is essentially a narrow back road and the appropriate design proposed, the development would be acceptable in this location.

Heritage Considerations

- 6.31 Policy DM24 of the Local Plan states that development should not adversely affect heritage assets or its setting (including important views that contribute to its setting).
- 6.32 This application is supported by a detailed heritage statement. It is also noted that the applicant has engaged extensively with the Worthing Society on the current proposals. It is highlighted that the site as existing does not contribute to the setting of the Conservation Area. This has previously been confirmed by the Council. The proposal would result in infill development providing a building of architectural merit within this setting, enhancing Marine Place and the Conservation Area.
- 6.33 The previous application included an angled southern elevation, with the intention of this to provide views from Marine Place to The Dome Theatre to the east of the site. This feature has been omitted from proposals, however it is noted that Marine Place is not a main pedestrian street and is essentially a back street / service street, and therefore there would not be a significant appreciation of the Dome from this vantage point.
- 6.34 The Heritage Statement supports this position, and states that “the street scene in Marine Place will be returned largely to a residential architectural form and appearance, appropriate to the scale in the immediate setting and therefore beneficial to the appreciation of the historical special interests of the Conservation Area and Listed Buildings. The difference in the building form at the southern end will have a neutral effect on the significance of the heritage assets. The current view of the roof of The Dome Cinema from Marine Place has only been available since the demolition of nos. 12 & 14 after the mid-1970s and as such, maintaining it would be inauthentic”.

- 6.35 It is therefore contended that the design of the proposals would not warrant refusal of this application on this basis. The proposed design, with the recessed second floor and appropriate detailing would ensure that there would be no significant harm to the setting of the properties along Bedford Row, Bedford Cottage or the setting of the Conservation Area.
- 6.36 When weighed against the public benefits of the building in terms of its enhancement of Marine Place, bringing regeneration and vitality to this part of the town centre, the proposals are considered to be acceptable in this regard.

Neighbouring Amenity and Environment for Future Occupiers

- 6.37 Policy DM5 of the Local Plan requires that development must not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight / sunlight, outlook, an unacceptable increase in noise giving rise to significant adverse impacts. Policy DM5 also requires new development to include a layout and design which take account of potential users of the site.
- 6.38 The application is supported by a detailed sunlight and daylight assessment. Given the previous approval and the similarities between this and the current scheme, the proposals would not have a detrimental impact on neighbouring amenity, which would warrant refusal of this application.
- 6.39 The proposals include the provision of obscure glazing to the rear to reduce overlooking of properties along Bedford Row. In addition, the relationship between the proposed development and the Debenhams site which is currently being developed was also deemed to be acceptable given the context.
- 6.40 Taking into account the similarities between the previous approval and the current scheme, the proposals would be acceptable in this regard. In any event, in this town centre location, a degree of mutual overlooking is considered to be normal and expected in such areas.
- 6.41 The proposals would be of an appropriate size and would comply with Nationally Described Space Standards (NDSS). Each unit would benefit from appropriate levels of daylight and sunlight and light within, as well as outlook from the respective flats.

- 6.42 It is also noted that the proposed flats would comply with the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings, with one unit provided which would comply with M4(3) (Wheelchair User).
- 6.43 In terms of outdoor amenity space, as detailed within the submitted plans, a number of the second-floor units would be served by outdoor terraces. In addition, it is highlighted that the site is located in very close proximity to the seafront and with large parks also within walking distance of the site, providing external amenity space for occupiers of the other units. The proposals would therefore be acceptable in terms of impact on neighbouring properties and would provide an appropriate level of accommodation for future occupiers, in line with the previous approval on site.

Highways and Parking

- 6.44 Policy DM15 of the Local Plan promotes and supports development that prioritises active travel by walking, cycling, non-motorised user routes and public transport, and reduces the proportion of journeys made by car, rebalancing transport provision in favour of sustainable modes.
- 6.45 This application is supported by a Transport Assessment and Travel Plan. As detailed above, the proposals would decrease occupancy levels within the building / site when compared to the previous approval. The proposal, as per the previously permitted application, would be car free, with appropriate cycle storage provided. Occupants of the flats would be provided with a travel voucher to be used for season tickets for bus or rail, drive time credit for a car club, and / or the purchase of a bike, in line with previously agreed provisions within the immediate vicinity of the site.
- 6.46 Appropriate provision for refuse and recycling would also be provided on site. The proposals are therefore considered to accord with the above policy and would be acceptable in this regard.

Flood Risk Considerations

- 6.47 Policy DM20 of the Local Plan states that the Council will work with relevant bodies to ensure that flood risk in Worthing is managed and reduced. While it is acknowledged that the site is located in Flood Zone 3, taking into account the previous approval and given the nature of the proposals, the development would be safe from flooding and would not increase flood risk elsewhere. The existing impermeable site would be replaced by a more permeable one, reducing flood risk and providing safe access and egress through a flood resilient design, including the raising of the ground floor levels.

- 6.48 The flood risk assessment provided concludes that the development would meet the sequential and exception tests as set out within the NPPF. Taking the above into account, it is contended that the proposals would be acceptable in this regard.

Ecology / Biodiversity

- 6.49 The Local Plan policy DM18 requires new development (excluding changes of use and householder development) to provide a minimum 10% net gain for biodiversity.
- 6.50 The application is supported by a detailed Preliminary Ecological Assessment (PEA). The PEA sets out enhancement and mitigation measures to ensure that there would be no detrimental impact on any protected species or habitats. The applicant would be happy to agree to suitable conditions to cover these requirements.
- 6.51 The application is also supported by a Biodiversity Net Gain (BNG) metric and a BNG report which shows that the proposals would deliver measurable BNG (minimum 10%). As such, the submitted details show that the proposed development would be in accordance with Policy DM18 of the Local Plan.

7. Summary and Conclusion

- 7.1 Overall, the proposed development represents an appropriate form of development, providing valuable residential units of accommodation in this highly sustainable town centre location. The proposal would be acceptable in terms of design and heritage, flood risk, neighbouring amenity, the level of accommodation to be provided and transport and highways.
- 7.2 The proposed development represents the final phase of the Debenhams master plan, regenerating an under-utilised and dilapidated site, and resulting in an overall enhancement of the site and immediate surroundings. The proposals make efficient use of a brownfield site optimising its potential with a building of high quality architectural merit which respects its sensitive location.
- 7.3 As such, the proposals would be in accordance with the relevant Policies of the Worthing Local Plan and the NPPF and therefore, the Local Planning Authority is respectfully requested to grant planning permission accordingly.