

Connaught House (Marine Parade) Limited
30-34 North Street
Hailsham
East Sussex
BN27 1DW

Worthing Borough Council
Adur & Worthing Councils
Portland House
44 Richmond Road
Worthing
BN11 1HS

23 January 2026

Dear Sir/ Madam

Discharge of Pre-commencement Conditions: Application for the Discharge of Pre-commencement Conditions pursuant to Application Reference AWD/1174/23 (*Part change of use of ground floor from restaurant and amusement arcade to restaurant and use class e (commercial/business) space with new shop fronts to bath place and marine parade; change of use of upper floors from vacant pool / snooker hall; associated extensions and alterations at ground, first, second and third floor rear and at fourth floor and roof level to create 21 no residential dwellings*) at 32-34 Marine Parade, Worthing, West Sussex, BN11 3QA.

This application has been submitted online via Planning Portal under reference PP-14656910 and includes the application form, relevant documentation, and this covering letter.

This application relates to the submission of information pursuant to the discharge of the following conditions:

Condition 03 – Material Samples

No works to implement the development shall be carried out unless and until a schedule and samples of the materials, colours and finishes to be used for the external walls and roofs of the proposed development (including all new and replacement windows and doors and balustrading to roof terraces) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be completed in accordance with the approved schedule and samples.

Reason: *In the interests of visual amenity and to comply with policy DM5 of the Worthing Local Plan.*

Please, find enclosed the following documents prepared by Life Size Architecture, which has been submitted in support of the discharge of Condition 03:

- 24026MP – Condition 3 – Material Schedule

Compliance Statement:

This statement is submitted in support of the Discharge of Condition 3 (Materials) attached to the above planning application.

The condition requires the submission and approval of details of the external materials to be used in the development.

The applicant confirms that all external materials will be implemented strictly in accordance with the Material Schedule prepared by Lifesize Architecture, submitted alongside this application.

The Materials Schedule clearly defines all proposed external finishes, including walls, roofs, windows, doors, glazing, rainwater goods, external terraces and roof-mounted solar installations.

The proposed materials have been selected to:

- retain and repair the existing building fabric where possible
- Ensure a high-quality appearance appropriate to the Marine Parade context
- Deliver a coherent, durable palette for new extensions and alterations.

It is therefore respectfully requested that Condition 3 be confirmed as discharged on the basis of the submitted Materials Schedule.

Condition 04 – Detailed Window, Door and Roof Design

No works to implement the development hereby permitted shall be carried out unless and until drawings (including vertical and horizontal sections) of the detailed design, proportions and profiles of all new and replacement windows and doors of the development, and the detailed design, construction and profile(s) of the roofs of the roof extensions, have been submitted to and approved in writing by the local planning authority. Thereafter the development shall only be carried out in accordance with the agreed details.

Reason: *In the interests of visual amenity and to safeguard the character of the building and the conservation area having regard to policies DM5 and DM24 of the Worthing Local Plan.*

Compliance Statement:

Condition 4 requires the submission and approval of drawings (including vertical and horizontal sections) showing the detailed design, proportions and profiles of all new and replacement windows and doors, together with the detailed design, construction and profiles of the roofs to the roof extensions.

Final detailed drawings showing window profiles, door sections and roof construction details have been submitted as part of this application. These drawings will reflect conservation-area sensitivity.

Furthermore, the submitted information fully addresses the requirements of Condition 4 and ensures

that the development will be implemented in accordance with the permission and the Local Planning Authority's expectations.

Please, find enclosed the following documents prepared by Life Size Architecture, which has been submitted in support of the discharge of Condition 04:

- Façade
 - VMZ-SN-MA-BV-01 corners single fold
 - VMZ-SN-MA-BV-01 corners
 - VMZ-SN-MA-BV-02 base
 - VMZ-SN-MA-BV-03 side abutment single fold
 - VMZ-SN-MA-BV-03 side abutment
 - VMZ-SN-MA-BV-04 window
 - VMZ-SN-MA-BV-05 base
 - VMZ-SN-MA-BV-06 top
- Roof
 - VMZ-SN-ST-GO-b1
 - VMZ-SN-ST-HKK-01
 - VMZ-SN-ST-KI-b1 Valley Detail to be used for slopes in excess of 14
 - VMZ-SN-ST-RAA-b2 skylight
 - VMZ-SN-ST-ZIJ-b1
 - VMZ-SN-ST-ZIJ-b2 wall abutment
- Windows
 - 33.2 SI (18 Argon 90) 4 FT [Swisspacer Ultimate Pro]_PLANITHERM TOTAL+ FG F5 (1)
 - accoustic glass ratings
 - Pilkington_Optiphon_Brochure_ENG (5)
 - Technical_bulletin_-_Noise_control_with_glass (3)
 - 24026MP - 310A - Proposed Window Elevations
 - 24026MP - 311A - Proposed South Elevation Window Schedule
 - 24026MP - 312 - Proposed West Elevation Window Schedule
 - 24026MP - 313 - Proposed North Elevation Window Schedule
 - 24026MP - 314 - Proposed East Elevation Window Schedule
 - BROCHURE_Sliding & Slide Folding Doors_IMS255SFD.201707 – BIFOLD
 - DATA SHEET_Alitherm_Series_IMSALS.201504 – FIXED
 - DATA SHEET_Visoglide Series_IMS650VGS – SLIDING
 - Stayfix VS – SASH
 - stayfix_brochure-climate_i - CASEMENT

It is therefore respectfully requested that Condition 4 be confirmed as discharged.

Condition 05 – Construction Management Plan (CMP)

No works to implement the development shall take place, including any works of demolition, until a Construction Management Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved CMP shall be implemented and adhered to throughout the entire demolition/construction period. The CMP shall provide details as appropriate but not necessarily be restricted to the following matters:

- *the anticipated number, frequency and types of vehicles used during construction;*
- *HGV construction traffic routing shall be designed to minimise journey distance through the AQMA's;*
- *the method of access and routing of vehicles during construction;*
- *the parking of vehicles by site operatives and visitors;*
- *the loading and unloading of plant, materials and waste;*
- *the storage of plant and materials used in construction of the development;*
- *the erection and maintenance of security hoarding;*
- *a commitment to no burning on site;*
- *the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders);*
- *details of public engagement both prior to and during construction works;*
- *methods to control dust from the site*

Reason: *In the interests of highway safety and amenity having regard to Policies DM15 and DM22 of the Worthing Local Plan.*

Compliance Statement:

A CMP framework is included as part of this application. It addresses traffic routing, contractor parking, delivery controls, dust mitigation, noise controls, waste management, hoarding, wheel washing, and public engagement.

Once finalised with contractor-specific logistics, this will fully satisfy Condition 05.

Condition 08 – SuDS Construction Drawings & Method

No works to implement the development shall take place unless and until construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement have been submitted to and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings and FRA (Flood Risk & Sustainable Drainage Assessment by HOP, 03/01/2024, revision V1.2) and remain in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To ensure that the development achieves a high standard of sustainability and in accordance with the NPPF and policy DM20 of the Worthing Local Plan.

Compliance statement:

Condition 8 requires the submission and approval of construction drawings of the surface water drainage network, including associated drainage network, including associated sustainable drainage components, flow control mechanisms, and confirmation that the scheme accords with the approved Flood Risk and Sustainable Drainage Assessment.

The original approved Flood Risk and Sustainable Drainage Assessment proposed an indicative blue roof attenuation strategy. During detailed design development, it has become clear that this strategy cannot be implemented for the following reasons:

- Structural constraints: Further assessment of the existing building structure confirms that it cannot safely accommodate the additional load associated with a blue roof system, without disproportionate structural intervention.
- Conflict with approved sustainability measures: The same roof area identified for the blue roof was also approved to accommodate an integrated building-integrated photovoltaic (BiPV) roof system. The two systems are not compatible.

The blue roof strategy has therefore been fully considered but ruled out on the basis of structural feasibility and approved roof use, rather than design preference.

Revised Drainage Strategy

A revised surface water drainage strategy has consequently been developed and is submitted as part of this Condition 8 discharge application, supported by updated drainage drawings, calculations and a construction method statement.

The revised strategy:

- Removes the indicative blue roof component due to structural and design incompatibility;
- Introduces alternative on-site attenuation and flow control measures;
- Maintains controlled discharge rates in accordance with local and national policy; and
- Ensures that surface water runoff is appropriately managed without increasing flood risk on-site or elsewhere.

The proposed surface water drainage strategy is to be constructed in accordance with the approved drawings and HOP Consulting's Flood Risk Assessment (FRA). Paragraph 3.14 of HOP's FRA notes that *"the structural implications of a blue roof system would also need to be considered to justify the feasibility of the additional loading at roof level for the existing building."*

In response, a Structural Engineer's Statement has been submitted as part of this discharge application. This assessment explicitly considers the structural implications of introducing a blue roof and confirms that the existing building structure cannot accommodate the additional loading associated with such a system. As a result, a blue roof is not considered structurally feasible for this development. The submitted SuDS strategy therefore omits the blue roof element while retaining the remaining agreed surface water management measures as shown on the approved drawings.

The submitted information demonstrates that structural feasibility has been fully assessed in line with the FRA recommendations and confirms that the proposed SuDS solution represents the maximum viable and deliverable approach for the site. It is therefore considered that the requirements of the condition are met and that the condition can be discharged.

The development will be carried out strictly in accordance with the revised drainage details approved pursuant to this condition. No alteration to the approved drainage scheme will take place unless otherwise agreed in writing by the Local Planning Authority.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 08:

- C3937 101_Proposed Drainage Plan
- C3937 102_Proposed Drainage Plan
- C3937 201_Contributing Area Plan and Exceedance Flow Routes
- C3937 301_Typical Construction Details
- C3937 Maintenance Schedule
- C3937 SW Drainage Report
- SW Calculations
- Statement from the structural engineer

It is therefore respectfully requested that the Condition 8 be approved and formally discharged on the basis of the revised drainage strategy submitted.

Condition 12 – Noise & Overheating Mitigation

Work to implement the development shall not commence unless and until a scheme for protecting the proposed noise sensitive development from external noise has been submitted to and approved by the local planning authority. All works, which form part of the scheme, shall be completed before any part of the noise sensitive development is occupied. The scheme shall have regard to the principles contained within the World Health Organisation community noise guidelines and achieve the indoor ambient noise levels for dwellings specified in BS8233:2014. The scheme should include full details of glazing and a strategy to prevent overheating. The noise level of any ventilation units when in use should not exceed the levels specified in BS8233:2014 and all duct work should be fitted on anti-vibration mounts. Following approval and completion of the scheme, a test shall be undertaken to demonstrate that the attenuation measures proposed in the scheme are effective and protect the residential units from noise.

Reason: *In the interests of residential amenity and to comply with policy DM5 of the Worthing Local Plan.*

Compliance Statement:

Condition 12 requires a scheme for protecting the proposed noise-sensitive development from external noise, having regard to the World Health Organisation Community Noise Guidelines and achieving the internal noise levels specified in BS 8233:2014, together with details of glazing, ventilation, overheating strategy and control of plant noise.

An Acoustic Assessment prepared by 7th Wave Acoustics (Ref: 1208.001R.2.0.JP, dated 23 January 2026) has been submitted in support of this discharge. The report assesses external noise sources affecting the site and evaluates the performance of the proposed glazing and ventilation strategy, including passive acoustic ventilation and MVHR systems where required.

The assessment demonstrates that:

- Internal ambient noise levels within all habitable rooms meet the relevant daytime and night-time criteria of BS 8233:2014;
- Night-time L_{Amax} noise levels comply with WHO guidance; and
- Noise from mechanical ventilation systems is suitably controlled and compliant with the applicable standards.

The development will be implemented in full accordance with the approved acoustic scheme, and any validation testing required by the condition will be undertaken following completion, as specified.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 12:

- 1208.001R.2.0.JP
- Overheating Strategy_32-34 Marine Parade_Worthing_V1

It is therefore respectfully requested that Condition 12 be approved and discharged.

Condition 14 - Sound Insulation Between Ground and First Floor

The sound insulation of the floor/ceiling between the ground and first floor shall achieve a minimum airborne sound insulation value of 50dB (DnTw + Ctr dB). Before any residential unit is occupied a test shall be undertaken to demonstrate compliance with this level.

Reason: *In the interests of residential amenity and to comply with policy DM5 of the Worthing Local Plan.*

Compliance Statement:

Condition 14 requires the floor/ceiling construction between the ground-floor commercial space and the first-floor residential accommodation to achieve a minimum airborne sound insulation performance of 50dB (DnTw + Ctr), demonstrated through post-completion testing.

Airborne sound insulation testing has been undertaken by 7th Wave Acoustics and is reported within the submitted Noise Assessment (Ref: 1208.001R.2.0.JP, dated 23 January 2026).

The results confirm that:

- The measured airborne sound insulation between the ground and first floors achieves 52 dB DnTw + Ctr,
- This exceeds the minimum performance requirement of the condition, and
- No additional mitigation measures are required.

It is therefore respectfully required that Condition 14 be confirmed as discharged.

Condition 15 – Basement Acoustic Assessment

No works to implement the development shall take place unless and until an acoustic assessment of the impact of noise from the basement commercial unit (No33-34) upon the residential units above has been undertaken and submitted to the local planning authority. The impact assessment shall include details of any mitigation necessary for protecting the residential units having regard to the principles contained within the World Health Organisation community noise guidelines and ensure the standards within Table 4 of BS8233:2014 are achieved in the residential units. All works which form part of the scheme shall be completed in accordance with the approved details before any parts of the residential units are occupied.

Reason: *In the interests of residential amenity and to comply with policy DM5 of the Worthing Local Plan.*

Compliance Statement:

Condition 15 requires an acoustic assessment of noise arising from the basement commercial unit and its potential impact on the residential accommodation above, ensuring compliance with the internal noise criteria set out in Table 4 of BS 8233:2014.

An assessment of basement-to-residential noise transmission has been undertaken and is presented within the 7th Wave Acoustics Noise Assessment (Ref: 1208.001R.2.0.JP, dated 23 January 2026).

The assessment includes:

- Site sound insulation testing between the basement and first-floor residential spaces; and
- A worst-case internal noise assessment based on representative basement use.

The results demonstrate that:

- The predicted bar noise level is 79db, measured sound insulation between basement and first floor is 58db, resulting in estimated bar noise level at first of 21db, which is below acceptable noise level of 30db;
- Predicted internal noise levels within the residential accommodation remain below the BS 8233:2014 criteria; and
- The risk of noise disturbance from basement use is low.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 15:

- 1208.001R.2.0.JP

It is therefore respectfully requested that Condition 15 be approved and discharged.

Condition 20 – Sustainability measures

No work to implement the development shall take place unless and until details of the proposed sustainability measures including not less than 7no ASHPs and an integrated solar PV array on the roof have been submitted to and approved in writing by the Local Planning Authority. No dwelling hereby permitted shall be first occupied until the agreed sustainability measures have been installed.

Reason: *In the interests of sustainable development and to comply with policies DM16 and DM17 of the Worthing Local Plan.*

Compliance Statement:

Condition 20 requires the submission and approval of details of the proposed sustainability measures, including not less than seven (7) air source heat pumps (ASHPs) and an integrated solar photovoltaic (PV) array on the roof, prior to first occupation of any dwellings.

Detailed of the proposed sustainability measures are submitted as part of this condition application. The approved sustainability measures will be fully installed prior to the first occupation of any dwelling, in accordance with the requirements of Condition 20.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 20:

- BiPV_CIGS_vs_CONVENTIONAL_SOLAR
- DATASHEET-FLEXTRON-9
- DRAW0008
- Flextron-IM-November-20231
- Panel-Socket-Plug-Layout

- 4698PS1i3a28012016 – Roof
- Catnic SolarSeam introduction
- Catnic Urban mini brochure
- Specification Guide Tata Steel 2014

It is therefore respectfully requested that Condition 20 be approved and formally discharged.

Condition 23 – Sustainable Travel Pack

No works to implement the development shall take place unless a draft 'Sustainable Travel Pack' incorporating sustainable travel incentives and discounts for the occupiers of the proposed dwellings has been submitted to and approved in writing by the local planning authority. The approved 'Sustainable Travel Pack' shall thereafter be implemented in full accordance with a timetable to be approved.

Reason: *To encourage and promote alternative travel options to the use of the private car and to ensure the delivery of sustainable development in accordance with the NPPF and policy DM15 of the Worthing Local Plan.*

Compliance Statement:

Condition 23 requires the submission and approval of a draft Sustainable Travel Pack incorporating sustainable travel incentives and discounts, together with a timetable for implementation.

A draft Sustainable Travel Pack is submitted as part of this condition discharge application. The submitted documents set out measures to encourage sustainable modes of travel, including walking, cycling and public transport, and identifies the arrangements for implementation in accordance with an agreed timetable.

The approved Sustainable Travel Pack will be implemented in full in accordance with the agreed timetable and made available to all future occupiers of the development.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 23:

- V1.2 Residential Travel Plan
- V1.1 Commercial Travel Plan

It is therefore respectfully requested that condition 23 be approved and formally discharged.

Condition 24 – Waste & Refuse Storage

No work to implement the development shall take place until details of the facilities for storing refuse/waste/recycling to serve the development have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be first occupied until the agreed refuse/waste/recycling provision has been provided and shall thereafter be permanently retained.

Reason: *In the interests of amenity and to comply with policy DM5 of the Worthing Local Plan.*

Compliance Statement:

Condition 24 requires the submission and approval of details of the facilities for storing refuse, waste and recycling to serve the development, prior to first occupation of any dwelling.

Details of the proposed refuse, waste and recycling storage arrangements are submitted as part of this condition discharge application. The submitted information demonstrates that adequate, accessible and appropriately located facilities will be provided to serve the development, in the interests of residential amenity and effective waste management.

The approved refuse, waste and recycling facilities will be provided prior to first occupation of any dwelling and thereafter retained permanently for the purposes approved, in accordance with the requirements of Condition 24.

Please, find enclosed the following documents, which has been submitted in support of the discharge of Condition 24:

- 24026MP – 210A - Proposed Ground Floor Bike and Bin Store Plan

It is therefore respectfully requested that Condition 24 be approved and formally discharged.

Concluding Statement - Discharge of Planning Conditions

This submission has been prepared to support the discharge of the relevant planning conditions attached to planning permission AWDM/1174/23, namely Condition 3, 4, 5, 8, 12, 14, 15, 20, 23 and 24.

The accompanying statements, drawings and technical reports demonstrate that each condition has been fully addressed in accordance with the wording of the decision notice and the objectives of the Worthing Local Plan. Where details were required to be submitted prior to commencement or installation, these has been provided as part of the relevant condition discharge application.

In respect of Condition 8 (Surface Water Drainage), a revised drainage strategy has been submitted where it has been demonstrated that the originally approved blue roof strategy cannot be implemented due to structural constraints of the existing building and conflict with the approved BiPV roof installation. The revised scheme achieves the same flood risk management outcomes as the approved Flood Risk Assessment, without increasing flood risk on site or elsewhere, and represents the only technically deliverable solution for the development.

The submitted acoustic assessment confirms compliance with Conditions 12, 14 and 15, demonstrating that appropriate mitigation measures are in place to protect future residents from external noise, commercial noise transition and internal noise transfer.

Sustainability, plant noise, travel planning and refuse storage matters have likewise been fully addressed through Conditions 20, 23 and 24, with implementation secured in accordance with the approved details.

The applicant confirms that:

- The development will be carried out strictly in accordance with the details approved pursuant to these conditions;
- All measures required to be installed prior to occupation will be implemented in full; and
- Any future variation will be subject to prior written approval of the Local Planning Authority.

It is therefore respectfully requested that the Local Planning Authority confirms that the above conditions are approved and formally discharged, enabling the development to proceed in accordance with the planning permission.

Yours sincerely

Jonida Murataj