

Development Management – Delegated Officer Report

Application Number: AWDM/0223/26

Recommendation: – Refuse

Site: 11 Warwick Street Worthing West Sussex BN11 3DF

Proposal: Change of use of upper floors to provide two residential units (Use Class C3); shopfront alterations to include separate residential access; replacement of windows with double glazed windows; dormer reconstructed; and rooflights

Date of Site Visit: 24.03.2026

Neighbours Checked: Y

Additional Neighbours Notified: N Site notice posted 10.03.2026

Site and Surroundings

The application relates to a three storey mid-terrace building located on the north side of Warwick Street and includes rear two storey and single storey projections, occupying the depth of the site and linking to 2 Ann Street at the rear where there is pedestrian link providing access through a gated undercroft at this side.

The building appears to have been in use as a café at ground floor level with ancillary space in the upper floors. At the time of visiting the premises were vacant. An extract duct approved as part of application AWDM/1143/21 which would have allowed primary cooking at the site does not appear to have been implemented.

There is a mix of commercial uses in Warwick Street with some upper floors in residential use. To the west is a café at No.9 and at No.13 to the east is a barber's shop with residential flats to upper floors. At No.2 Ann Street to the rear of the site, Prior Approval was granted in 2020 (Notice/0013/20) for the change of use of the second floor of the building (in conjunction with the upper floors of 7 Warwick Street) to provide 7no. residential units and then in 2021 (Notice/0015/21) for the change of use of this vacant workshop building to form 2no. residential units which contain windows in the south elevation facing the application site.

The site is located within the South Street Conservation Area and is within the secondary shopping frontage of the town centre primary shopping area. It is identified as a local interest building.

Proposal

The application proposes the separation of the upper floors with a new residential access and new timber shopfront to the Warwick Street frontage at ground floor level. This would provide two residential flats at first, second and third floor level. The accommodation would comprise of one 1-bedroom flat and one 2-bedroom flat. Replacement fenestration is proposed throughout the upper floors with a combination of double-glazed timber sliding sash and casement windows proposed, and new

rooflight windows are proposed to the front and rear roofslopes and rear outrigger. The existing dormer windows are indicated to be reconstructed.

Relevant Planning History:

08/0728/FULL - Change of use from Use Class A1 (retail) to Use Class A3 (cafe/restaurant).

STATUS: Application Refused 28th October 2008.

AWDM/0741/12 - Application for a new planning permission to replace an extant planning permission (WB/08/0728/FULL) for a change of use from Class A1 (retail) to Class A3 (cafe and restaurant)

STATUS: Application Permitted 18th September 2012.

AWDM/1143/21 - Change of use to cafe/restaurant with primary cooking facility with the addition of canopy and extract flue.

STATUS: Application Permitted 14th April 2022.

Consultations

The **Highway Authority** has commented as follows:

This application is for the change of use of first, second and third floors to residential and retention of café use on ground floor. The site is located on Warwick Street, a pedestrianised street.

The site does not benefit from existing vehicular access or parking provision and the application does not alter this arrangement. The site is sustainably located within the centre of Worthing, within walking distance of a variety of local shops, services and transport options. Cycling is a viable option within the vicinity and as such the LPA may wish to consider whether there is any opportunity to secure cycle storage for the proposed dwellings. The LHA would not raise any highway safety or capacity concerns in regard to the proposal.

Conclusion

The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal.

Southern Water has made the following comments:

Southern Water has determined that the flow rate for the above site will remain consistent, so capacity is not an issue, and no Southern Water assets will be affected. Therefore, Southern Water has no objections to this proposal.

Please note surface water should not be disposed of into a public foul sewer and must comply with the Hierarchy of H3 of the Building Regulations. For more details, refer to the Drainage and Waste Disposal: Approved Document H on the GOV.UK website.

Any new connections to the public sewerage system will require a New Sewer Connection application (also known as a Section 106) to be submitted and approved by Southern Water.

Due to legislative changes effective from 1st October 2011 regarding the ownership of sewers, it is possible that some previously private sewers, now deemed public, could be crossing the above property and may not be shown on Southern Water records. Therefore, if any additional sewers are discovered during construction, an investigation will be required to determine their condition, the number of properties served, and potential access methods before any further work can proceed on site.

*For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).
Website: southernwater.co.uk or by email at:
SouthernWaterPlanning@southernwater.co.uk*

The Council's **Drainage Consultant** has commented as follows:

Thank you for your consultation on the above site. We have reviewed the application as the drainage consultant acting on behalf of the Council and wish to make the following comments.

The applicant is applying for alterations and adaptations to existing building to create 1no commercial unit and 2no residential units. The application is to Worthing Borough Council.

Following a review of the submitted information, we have no objection on surface water grounds. Due to the size, site, location and type of development, we would recommend the approval of the application with the following informative attached:

Informative 1: We have identified the site is adjacent to a flood risk, therefore the applicant should consider creating a Flood Risk Emergency Plan in case of the event of a flood. The Flood Risk Emergency Plan should be created in line with 'Flood risk emergency plans for new development' as produced by ADEPT and EA and demonstrate safe access and egress in accordance with NPPF.

The Worthing Society – no comments received

The Council's **Heritage Consultant** has commented as follows:

Objection - less than substantial harm

No. 11 Warwick Street occupies a prominent mid-terrace position within Worthing's primary retail core, forming part of a continuous commercial frontage typical of the town centre shopping streets. The building is of masonry construction, with a ground-floor shop unit beneath office/store accommodation over the first, second and third floors, and a notably large glazed modern street frontage to the retail unit.

The wider townscape is that of a busy, largely pedestrianised shopping precinct: Warwick Street is a short link between Chapel Road and the High Street/A259, with strong footfall and a dense mix of retail and café/restaurant uses at ground level. The

premises is serviced from the rear via a small yard accessed off Ann Street, reflecting the typical back-of-house servicing pattern for these in-line high-street buildings and reinforcing a clear 'public front/ service rear' hierarchy in the block.

The building lies within the South Street Conservation Area.

The Planning Permission application seeks to change the use of upper floors to provide two residential units (Use Class C3). This will involve shopfront alterations to include separate residential access; replacement of windows with double glazed windows; dormer reconstructed; and rooflights

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when exercising planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area."

The LPA's duties are reinforced within Section 16 of the NPPF, Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

As such, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Other elements held within Section 16 will also be considered as will Local Policy.

The proposal in heritage terms, in principle may be supportable, but the details of the proposed raise some concerns. In respect of the shopfront it is noted that the existing shopfront is modern and does not positively contribute to traditional character. As such this proposal is an opportunity for improvement, however a number of aspects appear to not take full advantage of this opportunity. Most notably the proposed does not reflect best practice guidance on shopfronts in conservation areas with the proposed lacking in the level of detail required to be assessed including 1:5 sections through the shopfront, the shopfront door and residential access door. The design of the shopfront door does not possess the continuous datum from the stall riser and appears overly modern. There is insufficient or no detail regarding the fascia, pilasters and general surround of the shopfront or any associated lighting.

It is also noted the proposed use of thick double glazing raises concerns regarding the general appearance of the proposed and should be reviewed.

In terms of the sash windows above, full thickness double glazing is proposed which is considered to erode proportionality and produce double reflections. Considering the limitations of the Section of the Act is restricted to character and appearance the thickness of the glazing should be reviewed as should the use of spiral balances. It is also noted the sections are generally overly manufactured with numerous rebates and other features that do not appear to be necessary or justified. In terms of fixing the lower windows this has not been justified.

In respect of the front dormer, some views towards this feature can be seen from the public realm. The proposed to install a top hung casement is not a traditional window form or opening method nor does it take opportunity for improvement. Once again the use of full thickness double glazing is not justified and a thinner form of DGC should be used that also conceals the trickle vent.

The proposed seeks a number of rooflights to both front and rear, it is noted that rooflights are present of varying qualities on the rear, and no rooflights are installed along the front roof slope of any neighbouring properties. As such to introduce a rooflight to the front roof slope would be an incongruous addition that complicates the consistent roof finishes and form seen in the area, conversely subject to details rooflights to the rear would be accepted.

The terms Velux is detailed on the drawings which is not a basis for acceptability and 1:10 elevations and 1:2 sections will be required of a suitable conservation rooflight, not necessarily a velux.

Policy DM24 of the Worthing Local Plan requires applications within conservation areas to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of that area, and preserve important features. The policy also states that Planning permission to replace shopfronts of inappropriate design or materials, or in poor condition, in Conservation Areas will be granted providing the replacement is of appropriate design and materials, respecting the character of both the building and the Conservation Area.

In this case whereas replacement of a shopfront and other fenestration is proposed the desired quality as detailed within the policy and reinforced under paragraph 135 of the NPPF is not considered to be sufficient.

Moreover, paragraph 207 requires a heritage statement that details both the significance of the heritage asset and the impact of the proposed. The heritage statement and related desktop study should also be used to inform a proposal or design. The single paragraph and bullet points detailed within the combined design, access and heritage statement falls significantly short of the requirement and as such the proposal does not meet paragraph 207 of the NPPF.

Whereas the NPPF allows mitigation of harm via clear and convincing justification or public benefit, it is considered that any public benefit (such as the provision of housing) could be realised without infliction of harm to the character of the conservation area, as such the benefits are not unique to this proposal and as such hold insufficient weight to outweigh the great weight afforded to the conservation of heritage assets.

Having Regard to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the proposed by virtue of design, appearance, and form would fail to preserve or enhance the South Street Conservation Area, nor is it considered to comply with the requirements of Policy DM24 of the Worthing Local Plan or paragraphs 135, 207, 213 and 215 of the NPPF.

The Council's **Environmental Health** Officer has commented as follows:

The proposed development is a town centre location and the area is frequently noisy particularly late at night, with noise produced by pedestrians, street entertainment and from customers at various licensed venues in the nearby vicinity. There are also likely to be early morning deliveries to the retail outlets below and as such noise should be considered. Also as the proposed residential is over a commercial property and we will have to ensure that the sound insulation is sufficient. I would recommend the following conditions:

Construction work shall not commence 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 ventilation strategy to prevent overheating, should windows need to be kept closed to meet the internal noise standards.

The use hereby permitted shall include a sound insulation scheme for protecting the upper floor residential unit from noise from the commercial unit below. The Scheme shall achieve a minimum airborne sound insulation value of 50dB (DnTw + Ctr dB). Following implementation of the insulation scheme, a test shall be undertaken to demonstrate that the attenuation measures carried out has achieved the minimum airborne sound insulation criteria. The use of the development shall not commence until test results, demonstrating the minimum sound insulation criteria has been achieved, has been submitted to and approved by the local planning authority.

Representations

None received

Relevant Planning Policies:

Worthing Local Plan 2020-2036 (WBC 2023): Policies:

SP1 (Presumption in Favour of Sustainable Development)

SS1 (Spatial Strategy)

SS3 (Town Centre)

DM1 (Housing Mix)

DM2 (Housing Density)

DM5 (Quality of the Built Environment)

DM13 (Retail and Town Centre Uses)

DM15 (Sustainable Transport and Active Travel)

DM16 (Sustainable Design)

DM17 (Energy)

DM18 (Biodiversity)

DM20 (Flood Risk and Sustainable Drainage)

DM22 (Pollution)

DM24 (The Historic Environment)

National Planning Policy Framework (MHCLG 2024)

National Planning Practice Guidance

SPD 'Space Standards' (WBC 2012)
SPD 'A Guide to Residential Development' (WBC 2013)
CIL Charging Schedule (Aug 2021)
South Street Conservation Area Appraisal

Planning Assessment:

The Worthing Local Plan was adopted on 28th March 2023 (base date of Plan 2020). Policy SS1 sets out the Housing supply over the period 2020-2036 and gives a total figure of 3672 (an annual target of 230 dwellings per annum).

Paragraph 78 of the NPPF (2024) requires that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should, in addition, include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

The most recent 5 Year Housing Land Supply (5YRHLS) position for Worthing (as at 01/04/2023) demonstrates a 6.3 years supply applying a 20% buffer as at that time Worthing had failed the then current Housing Delivery Test (HDT) (2022 published December 2023).

However, the most recent HDT 2023 (published December 2024) shows that Worthing scored 107% and therefore faces no consequences from the HDT.

Having a 5YRHLS position and having passed the HDT with no consequences means that for Worthing Paragraph 11 c) of the NPPF applies which states: 'For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay '.

Spatial Policy SS3 (Town Centre) sets out the overarching development principles for the Town Centre and associated seafront and it is the starting point against which all proposed development in these areas will be assessed.

In Worthing, a retail network has been established based on centres of varied degree of size and importance. Policy DM13 sets out the detailed approach to secondary frontages, stating that a wider range of uses will be supported provided they are active uses with active shop fronts that will enhance vitality and viability and complement existing uses. However, such as takeaways and uses with closed and inactive will be resisted.

Proposals that help develop and enhance the evening and night-time economy will be supported in the town centre where the operation of such activities can be controlled to address residential amenity implications and can demonstrate that such uses will add to the vitality and viability of the centre.

For upper floors, DM13 sets out that the efficient and effective use of the upper floors that add to the vitality and viability of centres will be encouraged subject to:

- i) the proposed use of the upper floor will not undermine the viability of the unit on the ground floor particularly those retail uses;
- ii) consideration will be given to the nature of the use, its appropriateness to the centre in which it is proposed, hours of operation, intensity of use and impact on nearby uses.

The commercial use as a cafe would remain at ground floor level and it is considered that a mixed use is an appropriate form of development in the town centre. In this instance it is considered that the remaining ground floor unit is of sufficient size and with adequate facilities to remain viable. The proposed residential conversion of the vacant upper floors would provide two additional dwellings in a sustainable location which would contribute to the vitality of the town centre and make a small contribution towards increasing housing supply, which can be supported in principle. This is subject to detailed consideration of the effects of the development proposal on visual amenity and the character and appearance of the building and conservation area, the effects on living conditions for existing and future occupiers, highways and parking considerations, and sustainability considerations.

Visual Amenity and the impact on the Conservation Area

The Planning (Listed Buildings and Conservation Areas) Act 1990 states that the local planning authority should have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. The NPPF, further emphasises that when considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Policy DM24 states that development in Conservation Areas will be required to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of that area, and preserve important features.

Policy DM5 seeks to ensure all new development is of a high architectural and design quality and respect and enhance the character of the site and the prevailing character of the area.

The South Street Conservation Area Appraisal describes Warwick Street and Ann Street as follows:

Warwick Street is a pedestrianised street forming a corridor type urban space with a strong sense of enclosure which connects two major urban spaces. Ground floor retail uses with offices above are typical within the largely historic built form. Located towards the north-east of the Conservation Area, Warwick Street is a significant element of the town centre's retail area. The street presents a succession of individual shops and restaurants which links Brighton Road to the north end of South Street and thereby constitutes a key pedestrian route to and from the centre of town. The built environment combines with the predominantly retail use to produce a street of distinct character. Free of traffic, the highway provides a secure place in which people can window shop, linger or sit and enjoy the environment and views. The cafes and public houses provide chairs and tables in the street are a popular and interesting feature in the street scene. The restaurants and public houses are important for encouraging activity in the evening in this town centre location. Characterised by individual shops, the street provides an attractive and more relaxing environment than the main pedestrianised street, Montague Street. Shopfronts in themselves are important elements in the street scene and some are of special interest, particularly on the north side where there are a variety of designs and unusual recessed lobbies. Warwick lane links through to Ann Street to the north with an intimate and intriguing group of small specialist shops. The south side of Ann Street includes two listed buildings and several other buildings of considerable local historic or architectural interest. The historic north side of Ann Street was lost to development of the Guildboume Centre and Ann Street unfortunately acquired the character and nature of a service road. At the eastern end of Warwick Street on north side, the curved frontage of Colnade House returns into High Street providing an important link. On the south side, Whibley's excellent shopfront returns into The Steyne and provides an important termination to this Georgian Terrace.

The following architectural historic and townscape elements are identified:

- *Interesting and attractive buildings individually and in townscape terms.*
- *Buildings three to four storeys high.*
- *Buildings built at the back of the pavement.*
- *A variety of original architectural detailing which is evident on many period properties, including string courses, parapets, window dressings, pilasters, cornices, and window frames.*
- *The GR(V) double aperture oval pillar box which is believed to be one of only a very few which survive in use.*
- *Tree planting which defines a series of spaces in the street scene.*
- *The well defined paved urban square at the northern end of South Street.*

As noted by the conservation consultant, the existing shopfront at the site is modern and it is acknowledged that this does not make a positive contribution to traditional character. It is noted that there are some examples of shopfront windows directly fronting the street in the vicinity and there are examples of separate residential accesses to some frontages. However, the conservation consultant considers that the proposals do not fully take advantage of the opportunity to improve the appearance of the shopfront, with a modern fully glazed shopfront door and thickness of the double glazing, and with lacking detail to fully understand the joinery and detailing such as panels and mouldings, or the surrounding fascia and pilasters.

In relation to the replacement windows, no sections have been provided in relation to the existing timber windows to provide any comparison. The proposals include full thickness double glazing and an overly manufactured framework with additional features that the conservation consultant considers would not be necessary or justified. The proposal to install a top hung window within the dormers would not be sympathetic and again, the detailing of the window including full thickness double glazing is not considered appropriate. For the reconstruction of the dormers, there is a poor level of detail and sections to fully understand the materials and resulting appearance of the proposals.

There are no existing rooflights in the building and it is considered that the introduction of rooflights would create a cluttered and incongruous appearance. Furthermore the application has not demonstrated that a suitable conservation rooflight would be used. To the frontage the introduction of rooflights would be readily visible from wider views and would be harmful to the character and appearance of the building and wider conservation area.

Whilst the applicant has provided a design, access and heritage statement, this does not provide a detailed heritage statement with a clear explanation of the impact of the proposals on the significance of the heritage asset or justification for the design rationale.

On the basis of the information provided it has not been demonstrated that the proposals would not harm the character and special qualities of this local interest building or the wider conservation area. As noted by the conservation consultant, whilst the proposal may bring about public benefits in terms of the provision of housing, this could be carried out without harming the character of the building or conservation area and therefore the benefits are not unique to this proposal or sufficient to outweigh the harm that has been identified.

Residential Amenity

The NPPF emphasises the importance of creating places that have a high standard of amenity for existing and future users (paragraph 135). The quality of living environment derives not only from the amount of internal space, but also relates to issues of overlooking and privacy, natural daylight and outlook as well as the importance of private amenity space and the quality of the living environment in terms of the effect of noise and disturbance.

In terms of the effect on neighbouring occupiers it is considered that there would be no significant harm.

Policy DM2 requires that new dwellings, including those created through subdivision and conversion, will be expected to meet as a minimum, the nationally described space standards (or any subsequent Government update) for internal floor areas and storage space. Whilst higher density housing can help to meet housing needs and regenerate an area it is vital that greater intensification of development still provides a good living environment. A lack of living and storage space can compromise basic lifestyle needs and can have a profound impact on an occupant's health and well-being.

The proposals would provide one 1-bedroom unit with a floorspace of 50 square metres indicated and one 2-bedroom unit with a floorspace of 66 square metres indicated across two floors.

For the one bedroom unit, the overall floorspace would comply with national standards for a 1 bed 2 person flat. However adequate built-in storage space has not been demonstrated.

For the 2-bedroom unit, this is arranged across two floors and with a mezzanine to be formed over the main living space used as a sleeping deck. There is no formal separation from the main living/kitchen area for the sleeping deck and it is not clear whether this would meet the relevant private sector housing requirements. In terms of floorspace, no allowance has been made for the extra circulation space needed for two storey accommodation that is incorporated within the national standards, and as such the proposal would fall below the standard for a 2 bed 3 person dwelling. Ceiling heights are restricted at second and third floor level with heights between 1.9 and 2.2 metres and further restricted by the third floor roofslope. Whilst it is noted that some improvement would be made by removing the existing staircase which has restricted headroom and providing a new staircase, the accommodation proposed would not meet the Nationally Describe Space Standards overall and would be below the 2.3m threshold which is required for 75% of the overall GIA. Furthermore the sleeping deck bedroom floorspace as calculated on the application details takes account of the hallway and landing area and so in practice the area that would be used as a bedroom, although open plan to the hallway and stairs, would fall below the required standard for a double bedroom.

The proposals have not demonstrated a good standard of living environment for future occupiers.

The Council's space standards in relation to private amenity space continue to apply under policy DM2. However, no private amenity space is available to serve the development but the difficulties in providing private amenity space in a restricted town centre site is evident and acknowledged in the SPD. The site is close to public open space, such as the beach and Steyne Gardens, and the shortfall is considered acceptable in these circumstances.

The proposed flats would be exposed to noise and disturbance in this town centre location but occupiers would be aware of this risk at the outset and a noise assessment to determine details of a scheme for sound attenuation against external noise and internal noise transfer from the commercial premises has been recommended by the Environmental Health Officer. Any subsequent changes to the window specifications or ventilation requirements as a result of the scheme may require further consideration from a conservation and visual amenity perspective and so this would have been sought during the course of the application if the application was otherwise acceptable.

It is not clear from the details provided where bin storage would be accommodated as the residential accommodation would be severed from the rear courtyard and it is noted that the site area does not include access to this area. Had the application been

considered acceptable in all other respects these details would have been sought in the interests of residential amenity.

Highways and Parking

The site is in a highly accessible town centre location where residents need not be reliant on the private car. No car parking is possible on site and no objection has been raised by the Highway Authority in terms of parking, access or highway safety. Cycling is a viable option in this location. Had the application been considered acceptable in all other respects cycle parking provision would have been sought in the interests of promoting sustainable travel.

Sustainable Development

Although no objection has been raised by the Council's Drainage Consultant in terms of surface water drainage, the site is within Flood Zone 2 where the Environment Agency's standing advice would apply to vulnerable development. However, the application does not include a flood risk assessment and with no indication of flood levels or safe access and escape routes. More information would have been sought had the application been considered otherwise acceptable.

In relation to sustainable design, no detailed measures have been included in the supporting statement. Such details to include energy performance, use of renewable and low carbon energy production equipment, waste minimisation, and water efficiency as required by policy DM16, DM17 and DM21 could be secured by condition if the application were approved.

Recommendation:

REFUSE for the reason:-

1. The proposed development would not provide an adequate standard of living accommodation for future occupiers. As such the proposed development would be contrary to policies DM2 of the Worthing Local Plan and the relevant paragraphs of the National Planning Policy Framework.
2. On the basis of the limited information available, the Local Planning Authority is not satisfied that the proposed development would not detract from the historical and architectural integrity of the local interest building or that the proposed development would preserve or enhance the character and appearance of the South Street Conservation Area. As such the proposal is considered contrary to policies DM5 and DM24 of the Worthing Local Plan and the relevant paragraphs of the National Planning Policy Framework.
3. In the absence of an adequate site-specific flood risk assessment to demonstrate that the proposals would ensure that occupiers and users would remain safe from current and future flood risk for the lifetime of the development without increasing flood risk elsewhere, it is not considered to adequately address issues related to flooding and is therefore contrary to policy DM20 of

the Worthing Local Plan and the relevant paragraphs of the National Planning Policy Framework.

Informative

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

Is recommendation contrary to letter(s) of representation? N

Case Officer: Rebekah Hincke Date: 14.05.2026

Authorised by: Louise Prew Date: 14/05/2026