

Dear Adur & Worthing Council,

Re: Change of use from C3 Dwellinghouse to Large HMO (Sui Generis).

This Planning Statement has been prepared in support of a full planning application for:

- Conversion of an existing single dwelling (Use Class C3) to a large House in Multiple Occupation (Sui Generis)
- Demolition of an existing dilapidated side extension;
- Construction of a single-storey extension
- Formation of an 8-bedroom / 8-person HMO

The application site lies within the Warwick Gardens Conservation Area.

Heritage Statement

This Heritage Statement has been prepared in support of a full planning application for works at 16 Elm Road, Worthing.

The site is not a listed building but is located within the Warwick Gardens Conservation Area, designated for its cohesive late 19th century residential character. As such, the proposals have been developed with regard to the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve or enhance the character or appearance of the conservation area.

Elm Road forms part of a planned residential area developed in the late Victorian period, characterised by modest but well-composed terraced and semi-detached houses. The street displays a strong and consistent building line, with dwellings typically set back from the road behind small front gardens.

Properties are generally two storeys in height, constructed in brick with pitched roofs. Architectural detailing is relatively restrained but includes features such as bay windows, gables, and decorative brickwork. The area derives much of its significance from its uniformity and group value rather than from individually prominent buildings.

No.16 Elm Road is a typical example of this form and contributes positively to the character and appearance of the conservation area.

The significance of the Warwick Gardens Conservation Area lies in:

- Its origin as a coherent late Victorian / early Edwardian residential development;
- The consistency of scale, form, and materials across the area;
- The contribution of individual dwellings to a unified townscape;
- The survival of characteristic architectural features and street pattern.

The application property is not individually designated and does not appear to possess particular architectural or historic features of special note beyond its contribution as part of this wider group. Its heritage value is therefore primarily contextual, contributing to the overall streetscape rather than as a standalone heritage asset.

The proposed development comprises:

- Conversion of the existing dwelling into a large House in Multiple Occupation (HMO);
- Demolition of the existing dilapidated side extension;
- Construction of a single-storey rear/side extension in its place.

The external alterations associated with the change of use are limited, with the primary physical intervention being the removal of the existing side extension and the introduction of a modest single-storey extension.

Impact on Heritage Significance

Demolition of Side Extension - The existing dilapidated side extension is considered to be a later, subservient addition that does not contribute positively to the significance of the conservation area. Its removal presents an opportunity to enhance the site through a more coherent and integrated form of development.

Proposed Extension - The proposed single-storey extension is limited in scale and subordinate to the host dwelling. Its height and massing ensure that it remains visually recessive and does not compete with the primary building. The extension will integrate with the established character of the site and wider area. Due to its single-storey form and position, it will have limited visibility within the public realm. *Following comments from the Heritage Officer, the proposed extension has been amended to better reflect the character of the surrounding area. The roof has been redesigned as a hipped form to better respond to the local vernacular and reduce the perceived scale and massing of the extension. The fenestration has been revised to better reflect the proportions and detailing of the principal elevation of the host dwelling, while the external materials have been updated to match the existing property. The rooflight serving the en-suite has been relocated to the rear roof slope to minimise its visual impact. In addition, the width of the extension has been reduced and it has been set further away from the eastern boundary, helping to maintain the established spacing between neighbouring dwellings and preserve the pattern of development within the street scene.*

Change of Use to HMO - The change of use does not, in itself, result in harm to heritage significance, as it does not materially alter the external appearance of the building. Any associated external changes are designed and conditioned to ensure they do not detract from the character of the conservation area.

Rooflights - The proposed rooflights will comprise heritage-style conservation rooflights, installed flush with the existing roof tiles on the main roof and flush with the proposed roof tiles on the extension to minimise their visual prominence. They have been carefully positioned to provide appropriate outlook and natural daylight to the internal accommodation without resulting in overlooking or compromising the privacy of neighbouring properties. Following comments from the Heritage Officer, the rooflights have been relocated to the rear roof slope to further reduce their visibility from the public realm and minimise their impact on the character and appearance of the street scene.

Overall Impact

- Retain the principal building and its contribution to the streetscape;
- Remove a structure of limited or no heritage value;
- Introduce a modest and subordinate addition;
- Preserve the established scale, rhythm, and character of the street.

Overall, the development would result in no harm to the significance of the Warwick Gardens Conservation Area.

The proposals have been considered in the context of:

- The duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990
- The National Planning Policy Framework (NPPF), particularly Section 16 (Conserving and Enhancing the Historic Environment)

Paragraphs within the NPPF require that proposals affecting heritage assets should:

- Describe the significance of the asset;
- Assess the impact of proposals;
- Ensure that harm is avoided or minimised.

As the proposals result in no harm, they are consistent with national and local heritage policy objectives.

The application site lies within the Warwick Gardens Conservation Area and contributes to its character as part of a cohesive late Victorian residential development. The proposed works are modest in scale and carefully considered. The removal of the existing dilapidated side extension and its replacement with a subordinate single-storey extension represents a neutral or minor beneficial change. The change of use to an HMO does not adversely affect the external character of the building or the wider conservation area. Overall, the proposals will preserve the character and appearance of the conservation area, in accordance with statutory duties and national policy.

Planning Statement

It is a material consideration that the site benefits from a realistic fallback position.

Under the Town and Country Planning (General Permitted Development) (England) Order 2015, the change of use from a single dwelling (C3) to a small HMO (Use Class C4, up to 6 residents) can, in many circumstances, be undertaken without planning permission, unless restricted. National guidance confirms that such changes can occur under permitted development rights where not removed.

While Adur & Worthing Council have introduced Article 4 Directions in parts of Worthing (including the Warwick Gardens area), these primarily control the need for permission rather than the acceptability of the principle of small HMOs. Accordingly, it is a reasonable fallback that:

- The property could function as a 6-bedroom / 6-person HMO with limited or no external alteration.
- This fallback establishes the principle of HMO use on the site.

Policy DM1(e) – Loss of Existing Residential Accommodation

The proposal does not result in the loss of residential accommodation, as the building will remain in residential use and continue to contribute to the Borough's housing stock. The proposal represents a change in the form of residential occupation from a single dwellinghouse (Use Class C3) to a professionally managed 8-bedroom House in Multiple Occupation (sui generis), rather than the loss of residential accommodation to a non-residential use.

Whilst the proposal involves a change of use, the site will continue to provide residential accommodation and will make a positive contribution towards meeting the Borough's diverse housing needs by delivering high-quality shared accommodation for working professionals. Accordingly, it is considered that the objectives of Policy DM1(e), namely safeguarding the supply of residential accommodation, are maintained.

It is also a material consideration that the property benefits from a realistic fallback position whereby it could operate as a small House in Multiple Occupation (Use Class C4), subject to the relevant permitted development rights and planning controls. Whilst the proposed development seeks permission for an 8-bedroom HMO, the fallback position demonstrates that the principle of shared residential occupation is capable of being established on the site and is therefore a relevant consideration in the determination of this application.

The application seeks to:

- Extend the building at ground floor level (following demolition of a low-quality side extension);
- Optimise the internal layout to provide 8 bedrooms (8 occupants);
- Deliver a well-planned and policy-compliant large HMO.

The extension is modest in scale and subservient to the host building (as set out in the accompanying Heritage Statement). Given the fallback position outlined above, the key planning consideration is not whether HMO use is acceptable in principle, but whether the increase from 6 to 8 occupants and the associated extensions and alterations result in unacceptable impacts. The proposal therefore represents an intensification of an already acceptable use, rather than a fundamentally new land use.

The increase from a 6-person (C4) to 8-person (Sui Generis) HMO is modest in planning terms, with no increase in building height, limited increase in built form (single storey only), and no material change to the building's street presence. The additional accommodation is achieved through efficient internal reconfiguration and a modest side extension replacing an existing structure.

As set out in the Heritage Statement:

- The extension is subordinate and largely screened;
- The host building remains the dominant form;
- The removal of the existing dilapidated side extension represents a minor enhancement.

The development therefore preserves the character of the conservation area.

The uplift from 6 to 8 occupants would not give rise to materially different impacts in terms of noise and disturbance, general comings and goings, use of external space. Such impacts are characteristic of both small and large HMOs and can be appropriately managed through management arrangements and compliance with HMO licensing standards. The proposal will deliver a high-quality HMO, compliant with relevant space standards, and HMO licensing requirements. **Please refer to document: Clevernest - 16 Elm Road Management Statement.**

The proposed development has been designed to fully accord with, and in many respects exceed, the requirements set out in the Adur & Worthing Councils Compliance Guide for Houses in Multiple Occupation. The internal layout has been carefully considered to provide appropriately sized bedrooms, adequate and well-distributed shared facilities, and clear separation between private and communal spaces, ensuring a high standard of amenity for future occupants. Circulation space, natural light, and outlook have been prioritised throughout, with the scheme delivering a level of accommodation consistent with best practice rather than minimum compliance. In addition, provision for refuse storage, cycle parking and servicing has been incorporated in a manner that is both practical for occupants and sensitive to the character of the surrounding conservation area. As such, the proposal not only meets the functional requirements of the Council's guidance but demonstrates a proactive approach to delivering a well-managed, high-quality HMO environment.

Communal Accommodation

The proposed development provides two dedicated communal areas for residents comprising a 17.98m² shared kitchen/dining space and an additional 5.02m² flexible communal lounge, providing a combined total of approximately 23m² of communal accommodation. This exceeds the requirement of the Council's HMO Design Guide to provide a dedicated communal space proportionate to the number of occupiers and offers residents a choice of spaces for cooking, dining, socialising and informal interaction.

In addition, all bedrooms significantly exceed the Council's minimum space standards, providing a high standard of private accommodation that supports home working, study and day-to-day living. The generous size of the bedrooms complements, rather than replaces, the dedicated communal areas by reducing pressure on shared spaces while still encouraging social interaction within the well-proportioned communal facilities provided.

The proposal offers the following benefits:

- Efficient use of an existing residential building;
- Contribution to local housing supply, particularly shared accommodation;
- Removal of a poor-quality structure and replacement with a coherent extension;
- Delivery of a well-managed and policy-compliant HMO.

Set against this, the level of intensification is modest, there is no identified heritage harm, and impacts are comparable to the fallback 6-person HMO scenario.

The application should be considered in the context of a clear and realistic fallback position, whereby the property could operate as a 6-bedroom HMO. The proposed development represents a modest and well-considered intensification to an 8-bedroom HMO, supported by limited and appropriate built form. There is no material harm arising from the proposals, and the development accords with the objectives of national and local planning policy. Accordingly, the application is respectfully recommended for approval.

Kind Regards,

Ashley Harrison
Director & Architect

PMR Architecture