

From: **Gillian Walpole**
Date: Tue, 16 Dec 2025 at 17:50
Subject: Comments for Planning Application AWDM/0954/25
To: Planning - <planning@adur-worthing.gov.uk>

Dear Sir/Madam (FAO Jo Morin)

I am attempting to upload comments on the Planning Portal to the above planning application but receive an "Error - 403 Forbidden" message whenever I try to submit my comments.

In order to ensure my comments are being received, I have included them below for completeness.

Application Summary

Address: Marine View 111 Marine Parade Worthing West Sussex BN11 3QG

Proposal: CHANGE OF USE FROM GUEST HOUSE (CLASS C1) TO LARGE HOUSE IN MULTIPLE OCCUPATION (SUI GENERIS)

Case Officer: Jo Morin

Customer Details

Name: Mrs Gillian Walpole

Email:

Address: 110 Marine Parade, Worthing, West Sussex BN11 3QG

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Design Highway Access and Parking Loss of General Amenity Other Overdevelopment Privacy Light and Noise Trees and Landscaping

Comments:

We note a new Design & Access statement has been added to the planning portal. This document does not alleviate our significant concerns around this planning application.

Shifting bedroom and capacity numbers

The proposed numbers of bedrooms and occupants has constantly shifted throughout this application process:

- In the latest Design & Access Statement (dated 26/11/2025) in paragraph 1.1 it refers to 13 rooms for "21 people" and that there will be "8 double rooms and 5 single rooms" but then in the same document in paragraph 3.1 it refers to "nine double and four single rooms". This would actually create a total capacity of 22 people.
- In the Design & Access Statement dated 15/8/2025, paragraph 1.1 states "14 bedrooms (sui generis). The accommodation will house a maximum of 23 people, in 9 double rooms and 4 single rooms" [this equates to 13 bedrooms]. There are therefore two different numbers of bedrooms presented in the same paragraph.
- In the letter from DJM Town Planning dated 12/9/2025 sent to placate the considerable volume of neighbour objections, it refers to "23 people across 13 single and double rooms".

- In the original planning application form it states there will be 14 single bedrooms.

Every document associated with the planning application that states bedroom and capacity numbers presents different figures. How can the council and neighbours accurately assess the impact of this application if it is not clear how many bedrooms and occupants will be in the building. One must also question the rigour of this application that such a key piece of information keeps changing.

It should also be noted that there was no Design & Access Statement available on the Planning Portal during the public consultation period which fundamentally impacts the public's ability to understand the nature of the proposals and therefore make reasoned assessments of the proposal's impact. The DAS dated 15/8/25 has been added to the Planning Portal later and was not available during the consultation period.

Tenant profiles

In the letter from DJM Town Planning dated 12/9/2025 sent on behalf of the applicant to placate the substantial volume of neighbour objections (c. 52 objection letters) they state "Tenants are typically single adults on limited incomes who cannot afford a studio or one-bedroom flat in the private market. They are often key workers in the health, care, retail, and hospitality sectors, who support the local economy." The letter goes on to list respected major employers of HMO tenants as University Hospitals Sussex NHS Foundation Trust, HMRC and Lloyds Banking Group.

This text and list of employers was clearly a veiled attempt to alleviate the major concerns from neighbours of noise, disturbance, anti-social behaviour and risks to personal safety that could arise from HMO uses of emergency and temporary accommodation. A recurring concern raised in the neighbour objection letters is of anti-social behaviour issues in this area. These issues are exacerbated by other HMOs already operating in the immediate area.

These concerns are also raised in the letter from Sussex Police Officer DS Sharon Sawyer (dated 24/9/25) that states "the end of the town is busy anyway and is subject of crime and disorder. We can understand the community concern particularly with potential over concentration of HMO's in a defined area. I think the determination also needs to consider whom would be housed at the location is it supported living, emergency accommodation." The latest Design & Access Statement also does not appear to address any of the advice or concerns raised by the Designing Out Crime Officer.

It is therefore most concerning that in the latest Design and Access Statement it appears the intended tenant profile is "emergency and social housing, and temporary accommodation" as this is the use that creates the greatest risk to neighbours' personal safety, noise and anti-social behaviour. This concern is raised by Sussex Police themselves and they state "particularly with potential over concentration of HMO's in a defined area".

Housing Need

In the latest Design & Access Statement, the applicant states "the Council can currently demonstrate a five year supply of housing land". Given the applicant has stated the Council already has sufficient housing supply, one questions the need for such a large HMO in an area that the Police acknowledge already has an over concentration of HMOs (and all the anti-social behaviour that can bring), that is in a historically important and sensitive Conservation Area and a location that is highly prominent on a prime section of Worthing's seafront.

I would also refer to and reiterate all the points raised in my original objection letter of 29/8/2025 as feel the serious issues raised are still applicable and have not been addressed. Please see below where I repeat my original objection letter.

I write to formally object to the planning application seeking approval to convert the neighbouring property from a small guest house at 111 Marine Parade into a large House in Multiple Occupation (HMO). My concerns are grounded in policy, local planning strategy and the potential negative impacts on safety,

privacy and local residential amenity & character. The plans represent a clear over-concentration in this highly prominent seafront location and are clearly incompatible with the surrounding residential context.

- Issues regarding completeness of the Planning Application
 - Absence of a Design and Access Statement

A Design & Access Statement (DAS) was briefly included on the “Associated Documents” section of the Planning Portal before being removed. It’s brief presence on the Planning Portal shows that it exists and the DAS should therefore have been made public for the entirety of the public consultation period. The failure to provide this key document fundamentally impacts the public’s ability to understand the nature of the proposals and therefore make reasoned assessments of the proposal’s impact. Notably I understand the DAS stated the proposed HMO has a capacity of 24 persons (arranged as 10 double and 4 single bedrooms) but this key detail is not provided on any of the other documents now available on the Planning Portal. The application documents now available on the Planning Portal only refer to “14 bedrooms” (with no mention of 24 persons) which risks leading the public to underappreciate the scale of the potential use and therefore the degree of potential impacts.

- Absence of a Heritage Statement (a Heritage Statement has now been included in the latest D&A Statement although the concerns outlined below still apply)

111 Marine Parade is situated within the Marine View and Hinterland Conservation Area. I understand the Property’s inclusion within a Conservation Area means it is designated as a ‘Heritage Asset’. I was therefore concerned to note the absence of a Heritage Statement included in support of the Planning Application, particularly given the significant impact of the proposals on the character of the Conservation Area.

The National Planning Policy Framework (NPPF) states: “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.” The NPPF also states Heritage assets are recognised as an “irreplaceable resource, and should be conserved in a manner appropriate to their significance”, and this requires them to be fully understood in their heritage context.

Failure to provide a Heritage Statement indicates a lack of understanding from the applicant of the significance of the heritage assets affected and fails to provide evidence of how the proposal has been designed to conserve or enhance the character of the area.

According to the Worthing Borough Council Conservation and Heritage Guide (May 2023) ‘Guidelines for Development in Conservation Areas’: “All proposals for new uses and any physical changes associated with this [Change of Use] should take into account historic context and should not adversely affect the character or appearance of Conservation Areas.”

- Key Planning Policy and Material Considerations

Under National Planning Policy Framework (NPPF, December 2024), planning decisions must promote healthy, safe communities and sustain neighbourhood character. This proposed HMO arguably undermines those aims by risking overdevelopment, negatively impacting the local character and potentially compromising amenity and safety.

- Worthing Local Plan 2023

The proposal is contrary to Policies DM1 (a), (c) & (f)(i), (ii), (iii), (iv), DM2 (c)(i), (iv) & (d) and DM5 (a)(i), (ii), (iii), (iv), (v), (vi), (vii), (viii), (x) & (d), DM7 (a), DM16 (i) of the Worthing Local Plan insofar as these policies require that this application respects the character and location of the site, the character of the surrounding area and does not have an unacceptable impact on the occupiers or neighbouring properties.

- DM1 (a) & (f)(ii), DM2 (c)(i)(iv) - 111 Marine Parade is situated in an area with substantial architectural, historical, and cultural value and in one of Worthing's most important and prominent seafront areas. As a result, the property is included within the Marine Parade and Hinterland Conservation Area, is included within the Worthing Seafront Investment Plan (SIP) due to its proximity to the town centre and is neighboured by buildings with Article 4 designations due to their special importance in preserving the character of the area.
- DM1 (a) & (f)(ii) - Therefore this is a very important and sensitive area and the proposed change of use risks seriously impacting the character of the area.
- DM1 (a) & (f)(i)(ii), DM2 (c)(i)(iv), DM5 (a)(viii) - There is already a very high concentration of HMOs in the Marine ward and neighbouring Heene ward. This leads to concerns about detrimental impacts on residential character, unsustainable community mix and anti-social behaviour. A development of this scale would exacerbate existing issues.
- DM1 (f)(i),(ii),(iii),(iv), DM2 (d), DM5 (a)(viii), DM7 (a) - The provision of outdoor space is extremely minimal for the occupants from 14 bedrooms. The small sunken terrace area fronting Marine Parade would be the entirety of the outdoor amenity provision for all the residents. This area is very small, has no green space and is highly visible from both Marine Parade and the Promenade. It could also cause occupants to spill out onto the pavement and alleyway. There is no mention in the application for additional open space provision either on or off-site. The exposed nature of this terrace and its high level of visibility from both Marine Parade and the promenade will result in the occupants having no privacy during its use. In addition, excessive use of this area by multiple occupants has the potential to create a substantial noise disturbance and nuisance to neighbours and pedestrians. This would be exacerbated if friends of the occupants use this area to congregate. Mis-use of this highly visible and exposed space will have a significantly detrimental effect on this prime section of the seafront and in-turn on Worthing as a whole given the importance of the promenade to residents and tourists.
- DM1 (f)(i),(ii),(iii),(iv), DM2 (d), DM5 (a)(viii) - The provision of kitchen and communal living space appears insufficient for the occupants of 14 bedrooms. Considering the potential number of households within a single building, the lounge areas are unlikely to sufficiently meet the diverse social needs of residents. Coupled with the small size of many of the bedrooms, this is likely to make the external areas more appealing and therefore more heavily used. However given the lack of suitable outside areas, residents are likely to overflow into public areas with potential for negative effects to be felt across the wider locality.
- DM5 (a)(i), (ii), (iii), (iv), (v), (vi), (vii), (viii), (x) & (d) - There is no publicly available documentation associated with the application that provides detail or

explanation of how the proposal will: be of a high quality, improve the sustainability of the building, how it will enhance the local environment, make a positive contribution to the local character, how it will respect/enhance its own 'Heritage Asset' classification or that of neighbouring buildings or make a positive contribution to creating a safe and secure environment.

- DM2 (d), DM5 (a) Proposed Bedroom No.'s 3, 6, 8, 10, 12 are poorly configured and/or very small. The occupants would have minimal space or storage areas and will be unable to enjoy a good standard of living. The lack of space is particularly acute as some of the bedrooms could be occupied by more than one person. The poor quality of the proposed accommodation is the result of a proposed over-concentration of occupants in the building.
- DM1 (c) - There is no detail on how the property will be adaptable or enable access to disabled persons. The only access to the property appears to be via multiple steps with no apparent lift access to the upper floors. Under Part M of the Building Regulation 2010 "reasonable provision" should be made for people to gain access although no attempts to facilitate this appear to have been made in the application.
- DM5, DM16 (i) - The waste generated by occupants from 14 bedrooms will be substantial. The application does not provide adequate plans for waste storage, collection, or maintaining environmental hygiene, potentially threatening local cleanliness and public health.
 - - Noise, Disturbance, Loss of Amenity – DM5 (a)(viii)
- With occupants of 14 bedrooms there is significant risk of high levels of noise and disturbance leading to a loss of neighbourly amenity and protection of the existing residential character of this sensitive area.
- This area is susceptible to anti-social behaviour with some residents already fearful of walking around the area at night. I am concerned the arrival of a very large HMO will only exacerbate these issues. A concentration of occupants from 14 bedrooms living at the site and using it as their home may also mean that the site would act as something of a focal point for some occupiers and their guests. People choosing to congregate in and around the building would be likely to add to the level of movement, noise, disturbance and levels of anti-social behaviour in the vicinity.
- The highly prominent location of 111 Marine Parade will mean this congregation of people could have a detrimental effect on this prime section of the seafront and in-turn on Worthing as a whole given the importance of the seafront & promenade to residents and to encouraging tourism.
- The profile of how the site was previously used as a guest house will be very different from that now proposed. Given the proposed concentration of people on the site (with no seasonal variations in occupancy levels) and the way in which the building will likely be used, the proposal would represent a significant increase in activity, noise and disturbance. The overall result would be harm to the residential character of the area.
 - - Overlooking & loss of privacy - DM5 (a)(viii)
- The external staircase running the full height of the eastern elevation of 111 Marine Parade has historically been rarely used as it is a fire escape. As the only secondary staircase for the entire building and also providing a small amount of additional outdoor space where occupants could congregate, in HMO use it is likely to be used heavily. This will be exacerbated if the site is unmonitored with no-onsite management.
 - This fire escape staircase directly overlooks the entire western elevation of our house. Due to the elevated nature of this staircase the occupants of 111 Marine Parade would have an unobstructed view directly into our courtyard, ground floor

reception room, first floor rear bedroom, bathroom, landing and rear garden. This will completely destroy our privacy and right to quiet enjoyment.

- Our courtyard and rear garden are in clear line of sight of the external staircase so the ability for occupants of 111 Marine Parade to look down and into these areas would result in a complete loss of privacy.
- In addition the heavy use of this open-air external staircase by a large number of residents has the potential to lead to significant noise and disturbance that would impact a broad area of neighbouring properties.
- The Planning Application fails to demonstrate how usage of this staircase will be controlled or how the impact of noise and loss of privacy to neighbours as a result of this staircase will be managed.
- - Safety – DM5 (a)(vii)
- The alleyway running along the eastern elevation of 111 Marine Parade is very poorly lit and has several places for people to conceal themselves. The main entrance to my house opens directly onto this alleyway and it is the only route for me to enter and exit my house (I do not have access to my house from Marine Parade).
- This alleyway is also a main access route for the residents of Brunswick Cottages and is an important route for the occupants of Edinburgh Cottages/Western Row, in addition to anyone walking from Rowlands Road to Marine Parade. Brunswick Cottages are part of the Worthing Heritage Trail and the alleyway contains ancient remnants of the flint wall that once marked the boundary between Worthing and Heene.
- An influx of occupants filling 14 bedrooms risks turning this dark and relatively concealed area into a target for anti-social behaviour and therefore unsafe for local residents to use. Occupants from 14 bedrooms in 111 Marine Parade gathering on the terrace fronting Marine Parade and/or spilling out on the pavement, alleyway, fire escape stairs and steps up to the entrance of 111 Marine Parade would create considerable anxiety to me entering and exiting my house.
- - Parking – DM5 (a)(iv), (vii), (viii)
- With occupants from 14 bedrooms the application has the potential to generate considerable additional car/van usage, placing heightened pressure on parking. There is already a significant lack of resident parking and the issue is even more acute during summer months when parking can be almost impossible. The application does not propose any solution to provide cycle parking, mitigate traffic generation or parking impacts and therefore risks creating highway safety risks in an already congested area.

- HMO Licensing & Standards

In accordance with Adur & Worthing Councils' guidelines, any property occupied by five or more persons in more than one household sharing facilities must be licensed as an HMO. The licencing requirements include: fire safety measures, adequate space, shared amenity ratios and waste disposal measures. All HMOs are also bound by the HMO Regulations 2006 and the Housing Health and Safety Rating System. As this HMO could house occupants from 14 bedrooms, this property would need to meet much higher safety and amenity standards. The application does not provide sufficient details as to how these requirements will be met.

- Management

Effectively managing an HMO of 14 bedrooms is a considerable undertaking. There is no provision in the available planning documents for how the property will be managed. Will there be on-site staff, if so will they be on-site 24/7. If there are no on-site staff, how will the residents be

monitored. What measures will be put in place to ensure there is no anti-social behaviour or disturbance to neighbours. Are there restrictions on the times of day residents can use the terrace amenity fronting Marine Parade. Without an effective and comprehensive Management Plan the risks to the local community are exacerbated.

- Summary

In conclusion, the application to convert a small guest house into a 14 bed HMO represents a clear overdevelopment and over-concentration in this sensitive area of Worthing's seafront. The nature of the use and the level of occupancy proposed would result in noise and disturbance that would be harmful to the character of the area and the living conditions of adjacent and nearby occupiers. The plans are contrary to multiple Worthing Local Plan Policies insofar as these policies require that the use respects the character and location of the site, the character of the surrounding area and does not have an unacceptable impact on the occupiers of adjacent properties. The proposal would be contrary to the National Planning Policy Framework which seeks to ensure that developments are sympathetic to local character and that developments create places with a high standard of amenity for existing users. The proposals fail to demonstrate compliance with the necessary HMO licensing standards, amenity protections, parking, safety, waste management, and community character safeguards. In addition the plans would lead to a complete removal of privacy to my house and my ability to enter and exit my house safely.

I respectfully request the Council rejects this application.