

From:

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Date: 29.07.26

To:

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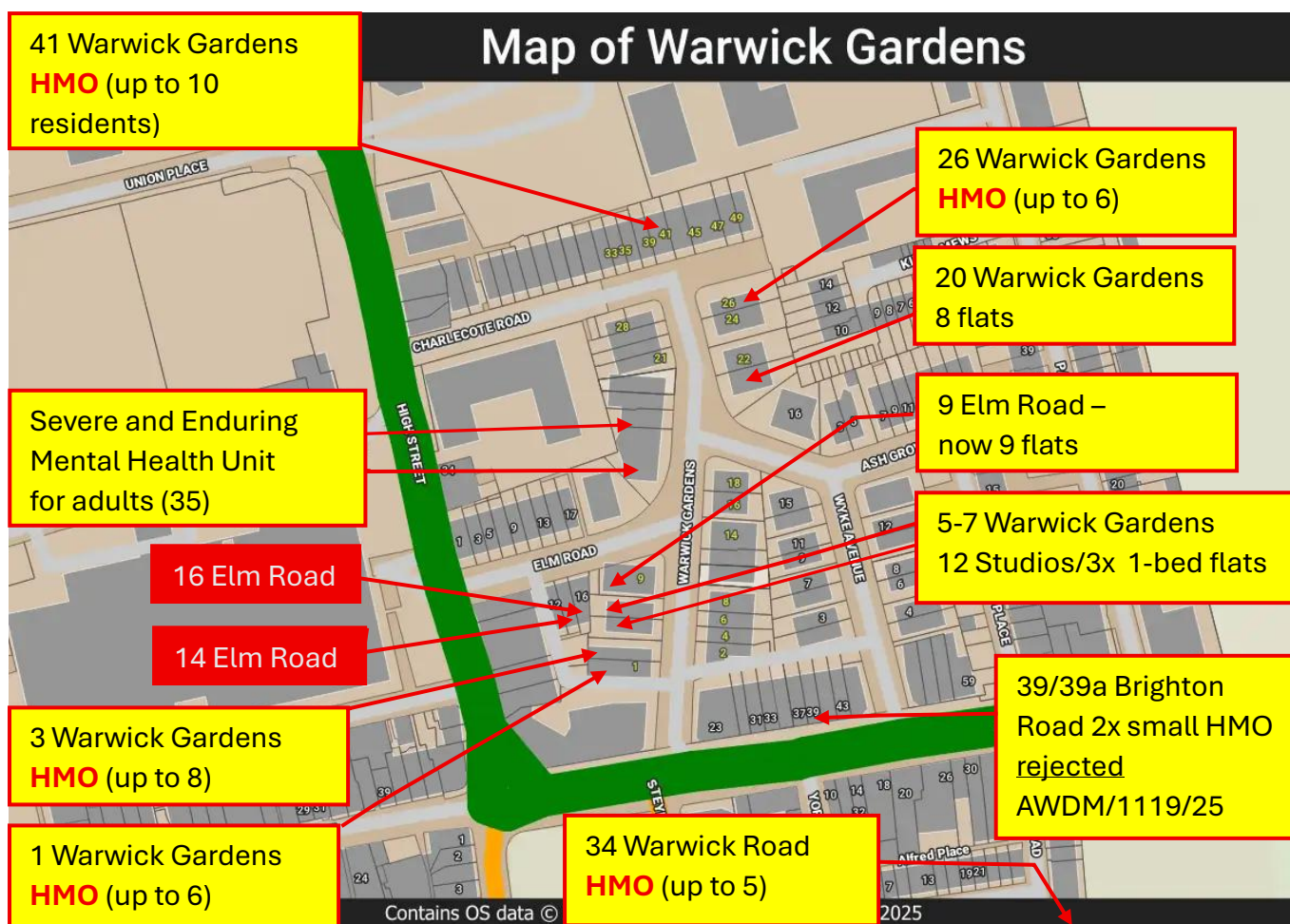
RE: Further objection letter - proposed change of use at 16 Elm Road, Worthing, West Sussex, BN11 1PG, from dwellinghouse (Class C3) to large house in multiple occupation (Sui Generis) and other proposed work. Reference: AWD/0445/26

Dear Planning Team,

I write further to my earlier objection and in response to the applicant's additional information. I remain concerned that the proposal would intensify residential use in an area already containing a significant concentration of HMOs, subdivided properties and other intensive accommodation.

1. Existing overconcentration of HMOs, intensive residential use and cumulative impact

The map below identifies the application property in red and nearby HMOs and intensive residential uses. HMO information is based on details supplied by the Council to me, with possible resident numbers in brackets. The Council has acknowledged that its records may not include all unlicensed HMOs, so the actual concentration may be higher. The map also shows nearby flats, studio units and publicly verified specialist accommodation for vulnerable adults.



Please note:

- ❖ No. 16 is directly backed onto by two HMOs and by 9 Elm Road, now converted into nine flats
- ❖ The immediate area includes HMOs at 1 Warwick Gardens (up to 6 residents), 3 Warwick Gardens (up to 8), 26 Warwick Gardens (up to 6), 41 Warwick Gardens (up to 10) and 34 Warwick Road (up to 5)
- ❖ Other intensive uses shown include 20 Warwick Gardens (8 flats), 5-7 Warwick Gardens (12 studios/3 one-bed flats)
- ❖ Severe and Enduring Mental Health Unit for adults (35)
- ❖ The nearby proposal for 39/39a Brighton Road, for two small HMOs, was rejected under reference AWDM/1119/25

2. Increasing population transience and impact on community balance

I draw the Committee's attention to the House of Lords Select Committee on Regenerating Seaside Towns and Communities report, *The Future of Seaside Towns* (2019¹). Chapter 5, "Housing, wellbeing and the built environment", pp. 61-85, identifies the proliferation of HMOs as an issue in many coastal communities, including population transience, community cohesion, housing quality and pressure on local services.

¹ House of Lords Select Committee on Regenerating Seaside Towns and Communities (2019), *The Future of Seaside Towns*, HL Paper 320, Chapter 5: "Housing, wellbeing and the built environment", pp. 61–85.

The growing concentration of smaller, more transient accommodation around Elm Road risks further unbalancing the local demographic mix. For example, older residents, a demographic Adur and Worthing highlight as significantly growing in coming years, have told me they feel increasingly isolated as long-term residents of a similar age reduce. This area is also well placed for older residents because of its proximity to shops, healthcare and public transport.

3. Loss of family-sized residential accommodation

No. 16 is a family-sized dwelling designed and built for that purpose. Its conversion into a large HMO would remove existing family accommodation when opportunities to retain such homes are limited. Nearby developments, including Union Place, are expected to provide substantial numbers of apartments (216) and no conventional family houses. Retaining family homes supports children, parents, longer-term residency and neighbourhood stability, and this loss should be given appropriate weight.

4. Impact on neighbouring residential amenity

A large HMO is likely to generate more intensive occupation than a single-family home, including increased comings and goings, visitors, refuse and outside-space use. I understand the developer has now said occupancy would be limited to eight residents and that overnight guests would need permission through the letting or management team. I am concerned that this would be difficult to monitor or enforce. With eight adult occupiers, ordinary visitors, partners or occasional overnight guests could significantly increase the number of people using the property at certain times.

The concern is the cumulative effect of overlapping visitors, social activity and outdoor use at a property not designed for that level of occupation. Proposed acoustic insulation to internal walls is very welcome, but whilst the proposed acoustic fencing (1.8 metres high) is also welcome and may provide some ground-level mitigation, this but may not address noise affecting upper-floor rooms and could potentially redirect sound upwards. The rear of No. 16 is closely overlooked by No. 14, with bedrooms facing the rear area, so increased garden or courtyard use could directly affect neighbouring amenity.

Photographs of the rear area of No. 16





5. Management statement and enforceability

The management statement is welcomed but should be given limited weight as a planning safeguard because it contains broad assurances rather than clear, measurable and enforceable commitments. It relies heavily on the intended tenant profile of 'working professionals in stable employment'. The plan also says anti-social behaviour 'may' result in enforcement action or termination, but this is not a guaranteed or immediate protection for neighbours. Impacts should firstly be controlled by clear planning conditions and should not be deferred to any later HMO licensing process.

As planning permission normally 'runs with the land', not the individual applicant, if permission is granted, the property and HMO business could later be sold or transferred. A future owner may charge different rents, use a different managing agent or seek a different tenant profile, provided the use remains within the permission, conditions and licensing requirements. Therefore, this application should be considered within the wider context of the area, for example if vulnerable adults were to be offered accommodation at a later date, would this be appropriate given the large mental health unit in close proximity?

Request

For these reasons, I ask the Council to refuse the application. If minded to approve it, any permission should include clear, enforceable conditions to address the above points. I also believe the committee should give limited weight to assurances based on the applicant's current business model or preferred tenant profile as this could change in the future such as with change of ownership.

Yours sincerely,

Russell Jacob