

Development Management – Delegated Officer Report

Application Number: AWDM/0635/26

Recommendation: – APPROVE

Site: 128 Tarring Road Worthing West Sussex BN11 4HA

Proposal: Change of use from Use Class C4 (small house in multiple occupation) to sui generis house in multiple occupation

Date of Site Visit: 29.06.2026

Neighbours Checked: Y

Additional Neighbours Notified: N

Site and Surroundings

The application relates to a late Victorian 2-storey mid-terrace house on the north side of Tarring Road. The dwelling, along with its immediate neighbours has a double height canted bay window with decorative eaves brackets, cornicing and rustication of the rendered front elevation. The roof space has been converted into accommodation and an L-shaped dormer added to the rear roof slope and outrigger. There is a cycle storage cabinet sited in the modest garden fronting Tarring Road. A deeper rear garden backs onto the main Brighton-Southampton railway line to the north.

The property is currently in use as a small HMO (Class C4).

Proposal

The property currently consists of 6 bedrooms over 3 floors, all with en-suite shower/WC or bathrooms; plus a communal kitchen/diner on the ground-floor, and a communal office and communal shower room/WC on the second-floor.

Permission is sought to use the property as a large HMO (sui generis) consisting of 7 no single occupancy bedrooms all with their own shower room/WC or bathroom. Essentially, the existing communal 'office' would become a bedroom. The communal kitchen/diner on the ground-floor would be unchanged.

Relevant Planning History:

AWDM/1161/25 - Application for Certificate of Lawfulness for Proposed Use as a small HMO (Use Class C4), rear dormer extensions and front roof lights

STATUS: Application Permitted 6th November 2025 – implemented.

Consultations

WSCC: The Local Highway Authority has raised no objection, commenting: -

"This application is for the change of use from Use Class C4 (small house in multiple occupation) to sui generis house in multiple occupation. The site is located on Tarring Road, an A-classified road subject to a speed limit of 30mph."

The proposal will result in one additional bedroom for the existing HMO, increasing the number of bedrooms to 7. No vehicular access or off-street parking currently exists for the HMO and this is not proposed to be altered as result of this application. The site benefits from existing secure and covered cycle storage which can be used by a 7th occupant. The LHA acknowledge that the site is located within Worthing, within proximity to a number of shops, services and transport links which reduce reliance upon the private car.

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."

Sussex Police: No objection in principle, commenting as follows:

"The National Planning Policy Framework demonstrates the government's aim to achieve healthy, inclusive, and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

Although the level of crime and anti-social behaviour in Adur & Worthing District is average as indicated within Police.uk additional measures to mitigate against any identified local crime trends and site-specific requirements should always be considered.

This planning application is seeking permission to increase the maximum occupancy by one person from 6 to 7 residents. I have had the opportunity to examine the detail within the application and in an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments:

The additional bedroom must be fitted with a fire rated (FD30 or higher) door with a minimum lock certificated to (BS8621) or (PAS 8621), fitted with a minimum of two hinge bolts or hinges with a similar integral facility to ensure protection in the event of a hinge failure following a criminal attack. The bedroom door must be also installed with a securely fixed robust planted stop, door chain and door viewer. If not having done so already - the applicant and their partners are also strongly advised to consult directly with the fire service with regards to these proposed changes to discuss a fire risk assessment as they may have some of their own requirements to be implemented into the premises before additional occupation can take place.

Thank you for giving me an opportunity to offer comments in response. The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due regard to the likely effect on the prevention of crime and disorder. You are asked to accord due weight to the advice offered in this letter which would demonstrate your authority's

commitment to work in partnership and comply with the spirit of The Crime & Disorder Act.”

Southern Water: No objection.

WSP: The Council's surface water drainage consultant has no objection.

Environmental Protection, Environmental Health & Licensing: No adverse comments.

Environmental Health Private Sector Housing: No objection in principle, the kitchen will need a re-design to meet licensing standards for 7 people.

Representations: None received.

Relevant Planning Policies:

Worthing Local Plan policies (WBC 2023): SP1, SS1, DM1, DM2, DM5, DM15, DM22
National Planning Policy Framework (MHCLG 2024)
National Planning Practice Guidance

Planning Assessment:

Principle of Development

The presumption in favour of sustainable development is at the heart of NPPF. For decision making this means approving proposals that accord with an up-to-date development plan without delay.

Local Plan policy SS1 sets out a total housing supply figure of 3,672, equating to an annual target of 230 dwellings per annum. This is a 'capacity-based' figure based on the level of housing that can be delivered having regard to identified constraints and development capacity. However, it is recognised that this target rate for delivery will fall significantly below the level of housing need in the Borough of 14,160 dwellings over the Plan period.

Policy DM1(a) states that in order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up-to-date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site. Policy DM1(c) states that housing developments should provide flexible, socially inclusive and adaptable development to help meet the diverse needs of the community and the changing needs of occupants over time.

The supporting text to policy DM1 states that development should provide an appropriate mix of housing types flexible enough to adapt to different local needs. It states that shared accommodation, including well-designed HMOs play an important role in providing housing for people on low incomes, those on benefit payments and young professionals. They are often the choice of housing for people who would otherwise be homeless (paragraph 5.5).

On this basis and considered in the context of the significant housing needs of the Borough, there is no objection in principle to the proposed change of use to a large HMO subject to the following considerations:

- The effect on the character of the area and mix of dwellings;
- Residential amenity of future occupiers;
- Effects on neighbouring occupiers;
- Sustainable travel and highway safety.

Local Character and Mix of Dwellings

The supporting text to Policy DM1 (paragraph 5.23) states that the Council will continue to monitor the provision of HMO accommodation throughout the period of the Plan but does not establish a methodology or seek to impose any numerical limits or thresholds regarding the provision of HMO accommodation or other similar forms of shared accommodation.

Policy DM2 states that proposals must make the most efficient use of land, which will usually mean developing at densities above those of the surrounding area. DM2(c)(i) and (iv) require consideration of the site context, character of the surrounding area and impacts on adjoining owners when establishing the optimum density of development.

Policy DM5 requires all development including changes of use to (amongst other things) (iii) make a positive contribution to the sense of place, local character and distinctiveness of an area; (iv) respect, preserve and where appropriate enhance, heritage assets and their settings; and (viii) make a positive contribution to creating safe and secure environment by integrating measures for security and designing out opportunities for crime.

This part of Tarring Road is primarily made up of a late Victorian and Edwardian terraced housing, domestic in scale and similar in style and character to the application property. St Matthews Church lies on the opposite (south) side of Tarring Road, within the Shakespeare Road Conservation Area. It is not listed but identified as a 'Local Interest Building'.

There are no records of when the current use of the application property as a small HMO (Class C4) commenced, made possible in this case by the larger floor area provided by the loft conversion. The provision of an additional 7th bedroom, created from the existing communal 'office', would not have any significant additional impacts on local character. No changes are proposed to the external appearance of the dwelling which will retain its domestic character. There would be no harmful impacts on the setting of the Shakespeare Road Conservation Area.

Residential Amenity – Future Occupiers

The supporting text to Policy DM1 states at paragraph 5.22 that to ensure the quality of any new accommodation is high and supports a good quality of life it is important that proposals are consistent with the space standards set out in Policy DM2. For

HMOs, applications will need to demonstrate compliance with minimum bedroom sizes and that the communal living space and cooking and bathroom facilities provided are of an appropriate size to meet the needs of the expected number of occupants.

The Government's Technical Housing Standards (NDSS) specify a single bedroom as having a minimum floor area of 7.5sqm, and a double room as having a minimum floor area of 11.5sqm.

As amended, the proposed plan shows 7 bedrooms, with the additional new room on the SF having a floor area of 9.3sqm. All bedrooms will exceed the minimum 7.5sqm for a single bedroom. All bedrooms are provided with adequate natural light and an outlook.

The Planning Statement submitted with the application states (paragraph 6.16) that the proposed communal area allows residents to cook, dine and socialise together or independently. It states that the space is arranged as an open plan living space where residents will be able to cook, eat and socialise together. Although residents will let rooms on an individual basis, it states that the conventional residential layout will ensure that there is an element of social cohesion between residents.

The proposed floor plan shows the floor area of the communal area as 18.35sqm consisting of a galley kitchen at one end with dining area and sofa at the other end. However, owing to the position of the door, at least 1.2sqm of this area consists of hallway and is not usable kitchen/dining space. In practical terms there is insufficient space to accommodate 6 (let alone 7) people at the dining table *and* include a sofa within the available space.

The Council currently has no formal guidance in place to assist in assessing whether the amount of communal space proposed is "*of an appropriate size to meet the need of the expected number of occupants*" other than as set out in the Compliance Guide for HMOs (V1.4.2023) used for licensing purposes. This states that: "For shared houses and flats you will need to provide a dedicated space for the occupants to sit down and socialise/consume meals, should they wish. This can be within the kitchen or a separate living space but should be proportionate in size and to the number of occupiers sharing the dwelling." The Council's Private Sector Housing Manager has visited the property and notes that the kitchen currently has insufficient amenities (worktop, sink, cooker) for it to be licensed as a 7-bed HMO but considers this could be resolved. Whilst acknowledging that 7 people would struggle to cook simultaneously, the PSH team Manager states if the kitchen were re-designed it would meet minimum standards and become licensable.

Owing to the constraints of its size and configuration it is unlikely that the communal area will provide a conventional 'living space' for the residents as suggested in the Planning Statement. However, subject to the kitchen being re-designed it would provide satisfactory cooking/food preparation and dining space to meet licensing requirements. In the circumstances, it would be difficult to resist planning permission on ground of inadequate provision of communal space.

The Agent has highlighted examples where other 7-person HMOs have been permitted elsewhere in the town with smaller communal areas, including 157 Pavilion

Road (AWDM/1343/24), and 118 Ham Road (AWDM/0863/24) with communal areas of 17.5sqm and 17.7sqm respectively.

Residential Amenity - Neighbours

Policy DM5 requires all new development to (amongst other things) make a positive contribution to creating a safe and secure environment, and to not have an unacceptable impact on the amenities of adjacent properties, including an unacceptable increase in noise.

The size and layout of the application property and surrounding dwellings is relatively compact with neighbours in close proximity on either side.

The Supporting Statement (paragraph 6.26) explains that an enhanced level of soundproofing designed to achieve a 56dB reduction in noise levels was installed in the party walls at second floor as part of the works undertaken for the loft conversion and exceeds minimum requirement under Part E of the building regulations.

Whilst not a determining factor, it is noted that no neighbour representations have been received.

It is not considered the proposed accommodation of 1no additional person in the HMO will have a material impact on the potential for noise and disturbance to affect the amenities of neighbouring occupiers.

Sustainable Travel and Highway Safety

There is no off-street parking provision available to serve the property. Very few properties in this part of Tarring Road have on-site parking and on-street provision is limited owing to the narrow width and configuration of the road. The limited amount of on-street parking that is available is within the Controlled Parking Zone, as are nearby roads, which typically have little spare capacity. However, the LHA has not raised any objection on highway safety grounds, acknowledging the sustainable location of the property which is within walking distance of the facilities and services of the town centre and accessible to public transport services. There is currently secure, cycle storage provision within the front garden and further space available within the secure, private rear garden (although this would be less convenient, necessitating taking bikes through the hallway and communal kitchen/dining room).

Recommendation:

APPROVE subject to condition(s): -

1. Drawing Numbers
2. Standard time limit
3. Total number of residents not to exceed 7

Informative

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

HMO Licencing

Sussex Police

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

Case Officer: Jo Morin Date: 23.07.2026

Authorised by: Louise Prew Date:23/07/2026