

From: **David Kingston**

Date: Sat, 23 May 2026 at 14:21

Subject: Ref: AWDM/0445/26 - objection

To: Planning - <planning@adur-worthing.gov.uk>

Dear Sir/Madam,

Apologies for this late return, I have been unable to submit comments on the planning portal with system error received.

I am writing to formally object to planning application AWDM/0445/26, which seeks to convert the existing dwellinghouse at 16 Elm Road from Class C3 to a large House in Multiple Occupation (HMO – Sui Generis), involving demolition of the side store, construction of a single-storey extension, and conversion of roofspace with front rooflights. As a resident in the immediate vicinity, I have significant concerns regarding the impact of this development on the conservation area, highway safety, residential amenity, community cohesion, parking and crime prevention.

This proposal fails to comply with core planning policies at both national and local levels, and the cumulative impact of this development—given the existing high concentration of HMOs in the area—would cause serious harm to the character, safety, and sustainability of the neighbourhood.

1. Harm to the Conservation Area (Section 72, Planning (Listed Buildings and Conservation Areas) Act 1990)

The property is located within a designated Conservation Area with Article 4 Direction, where special attention must be paid to preserving or enhancing the character and appearance under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposals include:

- Installation of front rooflights in the loft conversion, which are not sympathetic to the architectural character of surrounding properties and would result in visual harm to the conservation area.
- The cumulative effect of the side extension and roof alterations would erode the historic and residential character that the conservation area designation seeks to protect.

This directly conflicts with:

- Adur & Worthing Borough Local Plan policies on conservation area protection.
- National Planning Policy Framework (NPPF), Paragraph 199, which states that development should preserve or enhance the character of conservation areas.

2. Overconcentration of HMOs and Loss of Family Housing

The Central Ward of Worthing already has the highest concentration of HMOs in Adur & Worthing, with numerous properties on adjacent streets (e.g., 1, 3, 5-7, 9, 20,

21, and 23 Warwick Gardens) having been converted into multiple flats. This has led to:

- A severe imbalance in housing stock, with traditional family housing becoming increasingly scarce.
- Community cohesion being undermined by high turnover of transient occupants.
- Increased pressure on already overburdened local services and infrastructure of which the plan contains no accommodation for improvement to.

This proposal would add up to 14 occupants to a single property, exacerbating an already saturated area. It conflicts with:

- Adur & Worthing Borough Local Plan policies seeking to maintain a balanced and mixed community.
- NPPF Paragraph 60, which seeks to avoid overconcentration of HMOs that could harm the character of a neighbourhood.

3. Highway Safety, Traffic, and Parking Pressure

The application provides zero off-street parking for what could be up to 14 occupants. Given the location within a permit-controlled parking zone with limited on-street capacity, this will inevitably lead to:

- Overspill parking on adjacent streets, obstructing access for emergency vehicles and compromising pedestrian safety.
- Increased congestion, particularly at weekends when parking demand is already high.
- Conflict with NPPF Paragraph 116, which seeks to avoid developments that would cause severe cumulative impacts on the highway network.
- Potential increased and unsafe incidents of driving the wrong way in a one way system.

While the Local Highway Authority (LHA) has indicated they do not object on highway safety grounds, they acknowledge the amenity impact of increased parking demand. The lack of provision is contrary to best practice for HMOs, which typically require 0.5 parking spaces per bedroom (implying 4 spaces for this development).

Authority could impose a condition requiring sufficient off-street parking to mitigate overspill.

4. Noise, Privacy, and Residential Amenity Impacts

The proposed layout raises concerns about loss of privacy and noise nuisance:

- The small garden and low boundary wall will result in direct overlooking from the proposed development, affecting the privacy of adjacent residents.
- Smoke and vape fumes from the proposed outdoor smoking area will migrate directly into private gardens and open windows due to proximity.
- En-suite bathrooms adjacent to the party wall will cause 24-hour noise transmission (flushing toilets, running water, extraction fans).
- Acoustic insulation deficiencies are evident, with existing problems reported by neighbours due to removed chimney breasts and poor soundproofing.

This violates:

- NPPF Paragraph 123, which requires development to avoid unacceptable impacts on amenity.
- Building Regulations Part E (2015) on sound resistance.

5. Crime Prevention and Anti-Social Behaviour Risks

Sussex Police have submitted a formal consultation response highlighting significant security and management concerns:

- HMOs are historically associated with increased anti-social behaviour (ASB) and criminality. There have been and continue to be high levels of anti-social and illegal behaviour in the region of this development associated with poor management controls and HMOS.
- The lack of a Design & Access Statement means the end user cannot be ascertained, raising safeguarding concerns for vulnerable tenants.
- Stringent management controls will be required as a condition of any approval, but there is no evidence of how these will be enforced.

6. Waste Management and Public Health Concerns

The development would require additional waste bins (recycling, food waste, general waste) for up to 14 occupants. There is no indication of where these will be stored, and:

- Bin storage on pavements is prohibited in the area due to obstruction concerns for wheelchair users, prams, and mobility scooters.
- Overflow waste would attract more seagulls and foxes, creating public health hazards and nuisance.

This raises concerns under:

- NPPF Paragraph 97, which seeks to protect health and amenity.
- Local waste management policies.

7. Inadequate Provision for Number of Occupants

The floor plans indicate a kitchen and communal space that appears inadequate for up to 14 occupants. This could lead to:

- Overcrowding and stress on shared facilities.
- Increased noise and disturbance within the HMO itself.

This conflicts with:

- HMO Standards and NPPF guidance on avoiding overcrowding.

8. Potential Public Sewer Issues

Southern Water has indicated a possibility of a public sewer crossing the site. If confirmed, this could lead to:

- Noise and disturbance during maintenance.
- Restrictions on future development or alterations.

9. Failure to Address Planning Policy Requirements

The application lacks:

- A Design & Access Statement, making it impossible to assess the end user or suitability of the design.
- Adequate fire risk assessment for lithium-ion battery storage/charging (as noted by Sussex Police).

For the reasons outlined above, this development is contrary to national and local planning policies and would cause harm to the conservation area, residential amenity, highway safety, community cohesion, parking, and crime prevention. The cumulative impact of HMOs in the area is already unsustainable, and this proposal would set a dangerous precedent.

I would be grateful if you could confirm receipt of this objection and advise of any future committee meetings where this application will be considered.

Yours sincerely,

David Kingston