

**Date. 22/08/2025**

Planning Department  
Worthing Borough Council  
Town Hall  
Chapel Road  
Worthing, West Sussex

**Re: Objection to Planning Application AWDM/0954/25 –  
Marine View Guest House, 111 Marine Parade, conversion  
to HMO**

Dear Sir/Madam,

I am writing to formally object to the proposal to change the use of Marine View Guest House (111 Marine Parade) from a guest house (Class C1) to a large House in Multiple Occupation (HMO). My objection is founded upon significant **health & safety, heritage, and policy compliance** concerns. In particular, I wish to highlight the fundamental conflict between **necessary HMO safety modifications** and the obligations to protect the **historic character and appearance** of this **designated Conservation Area**.

**1. Health & Safety & Fire Risk**

- The Adur & Worthing Councils' *Compliance Guide for HMOs (2023)* emphasises that “fire safety is one of the most important parts of a compliant and safe HMO” and that “multi-occupied buildings” inherently pose “increased risk of injury from fire” ([Adur & Worthing Councils](#)).
- Fundamental requirements include:
  - A 30-minute **protected escape route**
  - **Fire-rated doors** (FD30 or FD30S)

- **Automatic fire detection systems** with proper installation, certification, and maintenance ([Adur & Worthing Councils](#)).
- The *HMO application guidance* further mandates submission of a **Type 3 Fire Risk Assessment (FRA)** that includes checks for compartmentation, fire door integrity, means of escape, detection systems, and emergency lighting compliant with **BS 5839 Part 6:2013** and **BS 5266** ([Adur & Worthing Councils](#)).
- Additionally, general guidance notes that HMOs carry a higher risk due to “poor fire safety measures...inadequate Means of Escape,” and other hazards like overcrowding and poor management ([Adur & Worthing Councils](#)).

Given Marine Parade’s older building stock and likely outdated structure, it is improbable that these stringent safety measures can be met without extensive and intrusive alterations—raising serious concerns for occupant safety.

## 2. Protection of Seafront Character & Heritage

- The Worthing Local Plan defines the **Seafront Area** to include Marine Parade and places it within a context of heritage, tourism, and recreation, integral to the town’s identity and economy ([Adur & Worthing Councils](#)).
- Policy guidance states that within the Seafront Area, proposals must be in sympathy with the “appearance and character of the local environment,” and schemes that “enhance the area” will receive favourable consideration ([Adur & Worthing Councils](#)).
- Indeed, a recent application assessment for 40 Marine Parade emphasizes that properties in this terrace

contribute to a “strong uniform character and interesting original features” within a conservation setting ([democracy.adur-worthing.gov.uk](https://democracy.adur-worthing.gov.uk)).

The introduction of a dense multi-occupancy use in this sensitive heritage and tourist area would likely undermine its visual and cultural integrity.

### 3. Policy Context: Strategic Planning & Housing Mix

- The Worthing Local Plan (2023), formally adopted on **28 March 2023**, now serves as the statutory development plan for Worthing through to 2036 ([Adur & Worthing Councils](https://adurandworthingcouncils.gov.uk)).
- The *Seafront Investment Plan* highlights the seafront as “one of the town’s greatest assets,” with a clear vision for revitalisation through sensitive enhancement and public realm improvements—not intensive residential conversion ([Adur & Worthing Councils](https://adurandworthingcouncils.gov.uk)).
- Moreover, HMOs must conform to **Housing Health and Safety Rating System (HHSRS)** standards and management regulations regarding common areas, utilities, and means of escape ([Adur & Worthing Councils](https://adurandworthingcouncils.gov.uk)).

#### 4. Summary of Point 1,2 and 3.

| Ground                                   | Relevance & Concern   |
|--|---|
| <b>Fire safety / structural risk</b>     | The building likely cannot satisfy protected routes, fire detection, FD30 doors, emergency lighting, and a Type 3 FRA as required.                              |
| <b>Seafront character &amp; heritage</b> | Marine Parade is part of a conservation and tourist-focused area; HMO use conflicts with the established character and Local Plan vision.                       |
| <b>Policy conflict &amp; HMO</b>         | The conversion fails to align with the statutory Local Plan (2023), Seafront Investment Plan objectives, and minimum standards under HHSRS and HMO regulations. |

*“Please note that the Adur & Worthing Compliance Guide for HMOs (2023) requires critical fire safety measures—including protected escape routes, FD30 doors, and automatic detection systems supported by a comprehensive Type 3 Fire Risk Assessment—none of which are likely feasible in the age-old structure of Marine View Guest House. This creates unacceptable risk to future occupants.”*

#### 5. Conservation Area Constraints & Policy Context

- Marine Parade is located within the “**Marine Parade and Hinterland Conservation Area**”, one of Worthing’s 27 designated zones of special architectural or historic interest. Within such areas, councils must ensure that development **preserves or enhances** their character and appearance. Permitted development rights are restricted, often via **Article 4 Directions**, meaning even minor external alterations (e.g., changing windows, doors, or external fabric) require full planning approval ([Adur & Worthing Councils](#)).
- The Worthing Council’s **Conservation & Heritage Guide (May 2023)** affirms the Council’s commitment to safeguarding heritage assets—including Conservation

Areas—under both national and local planning frameworks ([Adur & Worthing Councils](#)).

- **The Marine Parade and Hinterland Conservation Area Appraisal describes** this seafront as “a fine section of seafront exhibiting the evolution of terraced architecture” from Regency through Victorian to Art Deco, unified by coherent features such as promenades, street furniture, and historic façades ([Adur & Worthing Councils](#)).

## 6. Conflict Between HMO Safety Requirements and Conservation Obligations

To comply with HMO safety standards—especially in a multi-occupancy setting—significant adaptations are mandated, including:

- Installation of **fire-rated internal doors** (e.g., FD30 with intumescent strips and closers).
- Creation of **protected escape routes**, emergency lighting, smoke detection, and possibly external escape solutions.
- Internal reconfiguration using stud walls or partitions.
- Addition of external fixtures such as **bin stores**, signage, or alarm systems.

While critical for occupant safety, these alterations risk compromising:

- Original architectural features (doors, staircases, detail work).
- External uniformity and appearance of the façade.
- The historical integrity and unity of the seafront terrace.

The Council has a **statutory duty** under **Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990** to give **special attention** to preserving or enhancing the character of this area ([Adur & Worthing Councils](#)). Installing modern fire safety measures that visibly disrupt the architectural integrity or alter the historic fabric would likely contravene this duty.

## Summary of Objection Grounds

| Issue                                  | Objection Point  |
|--|--|
| <b>Legal Duty under Section 72</b>     | Must preserve or enhance Conservation Area character; any harmful alterations are contrary to law ( <a href="#">Adur &amp; Worthing Councils</a> ) |
| <b>Heritage Policy Support</b>         | Council's Conservation & Heritage Guide reinforces protection of historic assets ( <a href="#">Adur &amp; Worthing Councils</a> )                  |
| <b>Marine Parade Special Character</b> | Appraisal highlights unique unified architecture and the importance of its historic appearance ( <a href="#">Adur &amp; Worthing Councils</a> )    |
| <b>Incompatible HMO Adaptations</b>    | Fire safety and practical requirements will necessarily damage historic fabric and appearance  |

*“Marine Parade lies within a designated Conservation Area where the Council has a statutory obligation under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to ensure all development preserves or enhances the area's character. The modifications necessary to meet HMO safety requirements—such as fire-rated doors, emergency lighting, escape routes, internal subdivision, and external infrastructure—would compromise the architectural integrity and uniform seafront character, contrary to both national guidance and the Council's Conservation & Heritage Guide (May 2023) and the Marine Parade and Hinterland Conservation Area Appraisal.”*

## **Conclusion**

For the above reasons, in regard to the serious **health and fire safety risks**, the incompatibility with **seafront heritage character**, failure to meet **statutory planning and housing standards** and as the necessary adaptations for HMO compliance inherently conflict with the Council's legal and policy obligations to protect the historic character and appearance of this Conservation Area, I respectfully request that the Planning Department **refuses permission** for the conversion of 111 Marine Parade into an HMO.

Yours Faithfully

Julian Everitt

100 Marine Parade, Worthing,