

From:

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Date: 17.05.26

To:

Planning Department
Adur and Worthing Council
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

RE: Objection Letter – Regarding 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: AWDM/0445/26

Dear planning team,

I am writing to formally object to the proposed House in Multiple Occupation (HMO) application relating to the 16 Elm Road, Worthing (referred to as 'Number 16' in this objection).

I live within the adjoining property and have significant concerns about this proposed development and potential to create a significant negative impact on the area and existing community. My understanding is that the application is to change this existing four-bedroom home into a Sui-Generis HMO for up to 14 adults (i.e. create 8 bedrooms, 6 of which are over 10.22m² and therefore be eligible for up to two people per room)

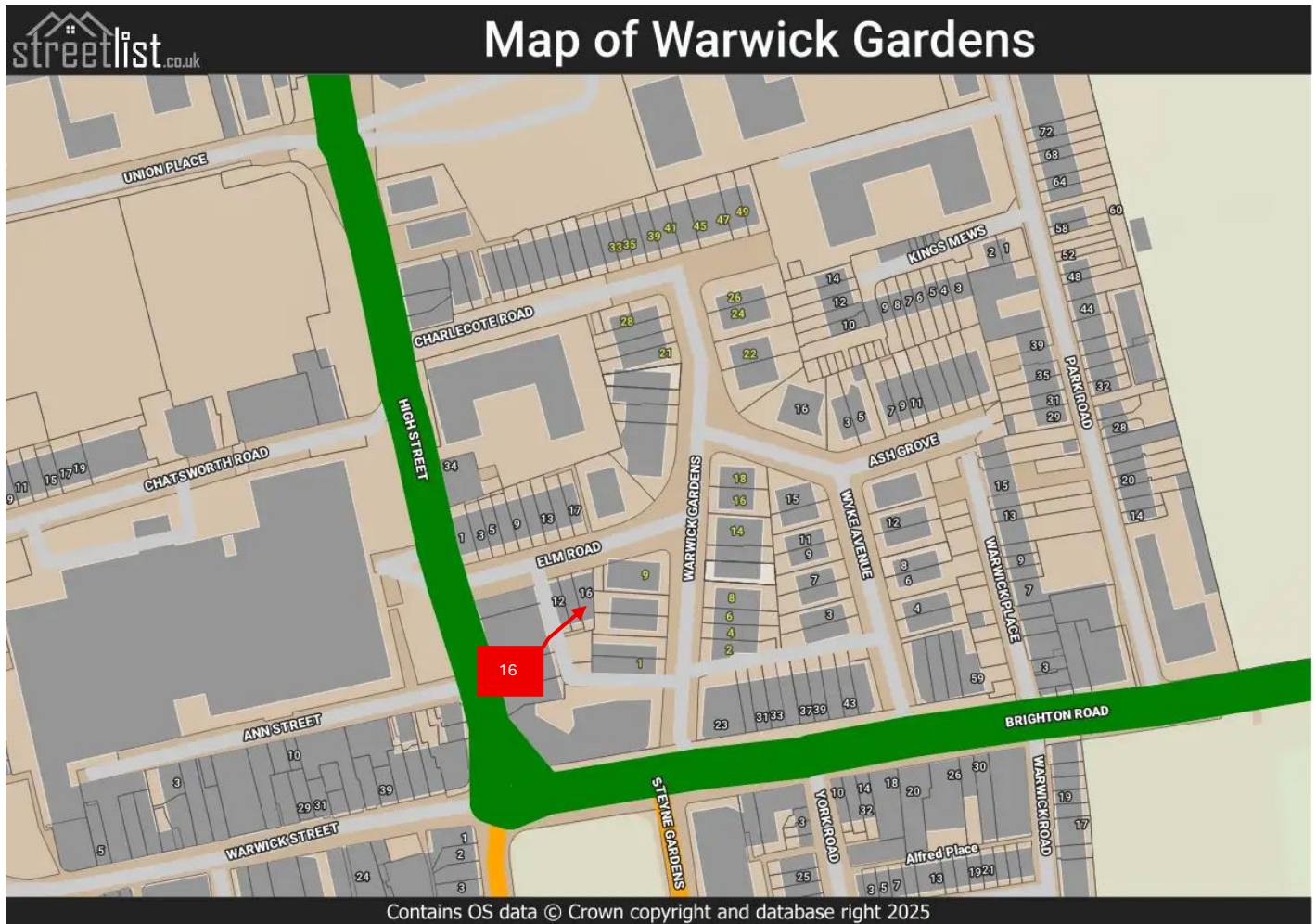
My objections are set out below:

1. Overconcentration of HMOs and vulnerable adults

First, I would like to provide very brief context to the area this proposal affects. Hopefully this will help provide greater understanding to those reviewing this who may not know this specific area. Please note the following is presented to the best of my knowledge.

Elm Road resides within the Warwick Gardens Conservation Area (please see appendix 1). Elm Road is a relatively small road (approximately 92 metres long) and is formed with 14 properties of which 7 are recorded as flats: Number 16 Elm Road (indicated in red below) is an end terraced house, adjoined by originally, two terraced homes (now flats). A further

dwelling on the same road is the flat above the food outlet at 26 High Street. Also, a house on the neighbouring street of Warwick Avenue is placed on the corner that meets Elm Road.



As can be seen in the above map, although formally addressed as Elm Road, Number 16 is closely integrated with both Elm Road and Warwick Gardens in physical, visual and community terms. Therefore, the effects of the proposed development should be assessed as impacting both areas rather than being viewed in isolation.

1.1 Overconcentration of HMOs

I wish to be clear that this objection is not motivated by NIMBYism ("Not In My Back Yard") but by specific planning concerns relating to overconcentration, community balance, amenity impacts, and cumulative effects.

Number 16 is already located in the Central-Ward district of Worthing, an area that officially has the most HMOs of an area within the whole of Adur and Worthing - I draw the council to

table 5.5 in the *Adur and Worthing Strategic Housing Market Assessment Final Report* (2025)¹. Additionally, this report indicates that HMO current data is incomplete and probably *underestimates* the complete picture – please see below (section 5.29).

Data relating to HMOs is incomplete, this stems from not all HMOs requiring a licence, only those occupied by five or more people. There will also be incidences where HMOs of five or more people are not registered and the extent of this illegal activity is not known

[in Adur and Worthing – inconsistencies exist between data sets such as census data]

Number 16 is located next to a large cluster of HMOs. I requested the council to supply a current list of known publicly registered Licensed Houses in Multiple Occupation in Adur and Worthing. The following data outlines the number of known HMOs on our neighbouring road of Warwick Gardens (which is estimated at only about 160 metres long).

Address			Max No. of households	Max No. of occupants	No. of storeys
1 Warwick Gardens	Worthing	BN11 1PE	6	6	2
3 Warwick Gardens	Worthing	BN11 1PE	7	8	3
26 Warwick Gardens	Worthing	BN11 1PF	6	6	2
41 Warwick Gardens	Worthing	BN11 1PF	7	10	3
34 Warwick Road	Worthing	BN11 3ER	5	5	3
31A Warwick Street	Worthing	BN11 3DQ	9	9	4

This data does not include other houses that have been converted into numerous flats. A short query of the internet reveals the following:

1. 5-7 Warwick Gardens – stated as converted into 12 studio flats, three 1 -bedroom flats²
2. 9 Warwick Gardens - is listed as converted into 8 flats³
3. 20 Warwick Gardens – a house currently for sale outlining 4 self-contained flats on the ground floor, and a further 4 on the first floor⁴

¹ <https://www.adur-worthing.gov.uk/media/Media,173487,smxx.pdf>

² <https://propertyauctions.io/listings/f51a3a96034d4dd6b1460af807594a14>

³ <https://www.192.com/places/bn/bn11-1/bn11-1pe/>

⁴ <https://jacobs-steel.co.uk/property/20-warwick-gardens-worthing-west-sussex-bn11-1pf/>

Increasing the numbers of people living in this area within HMOs (both small HMO's [C4's] and large HMO's [Sui-Generis]) erodes any sense of building a cohesive community (which can include temporary residents) and makes planning for the residents needs changeable and unpredictable. The character of the area also changes and makes building stable relationships impossible. The assessment report above highlights that older people (which is expected to grow as a demographic group significantly in Worthing) need secure housing and increasing the number of HMOs could reduce options and potentially increase loneliness and isolation. This also affects children where their opportunities to develop close friends becomes less likely.

1.2 High concentration of vulnerable people

In addition to the large number of HMOs in this small area, there is already a high concentration of vulnerable adults living within a small proximity. At the time of writing, the developer has not made any contact with me or the other residents in the adjoining houses as to the group of individuals they are targeting to rent to i.e. those with known vulnerabilities, less potentially vulnerable such working professionals etc. In either case, I think permitting this conversion is extremely inappropriate for the following reasons.

For example, less than 100 metres from Number 16 is Warwick House (at 11-17 Warwick Gardens). These adapted houses form a care home which cares for up to 35 people with complex needs and mental health conditions such as schizophrenia and bipolar illnesses. Myself, and other neighbours I know, frequently see the residents going about their daily lives: In general, we all live peacefully amongst each other, this in part because we have a sense of community on our street. When we have seen unusual behaviour, or people in distress, we can understand this within the context of the challenges people may face and this helps diffuse any misunderstanding: Community and cohesiveness is paramount if providing safe places for individuals struggling with their mental health. Additionally, it is anecdotally reported by neighbours that other specific groups of vulnerable individuals may be living in dedicated dwellings within Warwick Gardens who also require a cohesive community balance to reduce safeguarding concerns.

As the council's own recent commissioned research indicates, communities should have a mix of types of housing, and not a high concentration of any type (already a high concentration of HMOs already exist on Warwick Gardens):

There is also a wider need within the National Planning Policy Framework (NPPF) to ensure mixed and balanced communities, therefore high concentrations of housing of a particular type, not just HMOs, should be avoided

2. Noise

Number 16 is an end terrace, adjoined by two other properties. These three buildings are particularly vulnerable, inside, to external noise and from internal noise from other neighbours: I believe the proposed development poses both a risk of creating unnecessarily excessive and unacceptable internal and external noise disturbance and potentially neighbourly disputes.

The proposed development proposes that apart from a shared kitchen, the only communal internal area is a living room for up to 16 people which architects' drawings indicates will be 5.02m²: For context, this living area is smaller than two double beds side by side or even recommended space for a single prison cell (in Europe). This design will inevitably lead to people not always wanting to congregate in the kitchen if not cooking or eating, so will either be in their bedrooms or outside.

2.1 External noise

As the council are aware, residents in Elm Road, in addition to other streets, engaged in lengthy and protracted proceedings concerning noise nuisance from a neighbouring nightclub affecting life in our homes. This included involvement from Sussex Police, Environmental Health officers, and the Council's Licensing Department. As part of this investigation, Environmental Health visited my home, in addition to adjoining properties, and professionally recorded acoustic levels. Legal records demonstrated how external noise could easily enter the property, this with closed windows: Whilst this case related to a nightclub playing excessively loud music, the nightclub was not adjoining the property. Number 16, and adjoining two properties, are of early Victorian construction and were not designed to have strong acoustic protection qualities nor cater for so many people. One neighbour has paid a significant amount to have specialist acoustic windows on their bedroom to mitigate sound entering from outside.

Having many people living in Number 16, which only has a relatively very small backyard at the rear of the property, will almost certainly lead to people understandably wanting to congregate outside. This potential noise will not only potentially affect the adjoining properties on Elm Road, but also those that back-onto it from Warwick Gardens.

2.2 Internal noise

Obviously, we expect to hear neighbours and hearing some noise on occasion is part of neighbourly life. However, this building has particularly poor sound insulation: Whilst enjoying an amicable friendship with the former resident at no 16, I politely had to point out how easily having a television playing in the early hours could permeate through the wall, even though the television was not at an excessive level. The current plans infer the developers plan to remove the chimney breasts in the current rooms which will reduce even more any acoustic protection. Furthermore, such are the poor acoustic qualities that one neighbour has also had to install acoustic ceiling work to reduce transfer of sound. Such a construction will make it more challenging to ensure building regulations are met as part of Part-E for the resistance to the passage of sound (2015).

3. Risk of disturbance

Police Sussex have submitted an initial viewpoint as to the potential for criminality. They state in their correspondence of 28.04.26

'Historically there are cases where houses of multiple occupancy (HMO) have given rise to instances of anti-social behaviours (ASB)'

On Elm Road, we already can experience antisocial behaviour. For example, at the back of number 16 is a small alleyway that provides access to the back of the houses. This area is owned by number 16. Recently, to allow builders to safety work on my property, I had to remove various items of drug taking paraphernalia to make this area safe. This passageway is also subject to fly-tipping such as people dumping building materials such as tiles, insulation, as well as bags of dog mess. Other neighbours also speak of the ASB they have witnessed and encountered.

Police Sussex clearly state in their submission to this development that stringent management control of tenancies will be required and be a condition of planning. If this planning authorisation was to be passed – all authorities will need to be held accountable to ensuring that such stringent management is maintained.

4. Increased Parking Pressure and Highway Impact

The proposal may increase demand for on-street parking and place additional pressure on existing infrastructure. Parking availability is already limited in this area, especially at weekends.

Summary

In summary, I ask that the planning committee carefully consider the above and cumulative impact of this proposed HMO planning application. This development sets a dangerous precedence for future development, this in an area that already has the highest number of HMOs in Adur and Worthing, this where official records perhaps underestimate the true number. Such a development is also being proposed in an area where there are already several vulnerable adults and will further erode social cohesion. Finally, the development has a strong potential, given the proposed number of occupants, to create unnecessary disruption to the neighbours.

Thank you for considering my comments.

Yours faithfully,

Russell Jacob

Appendix 1

