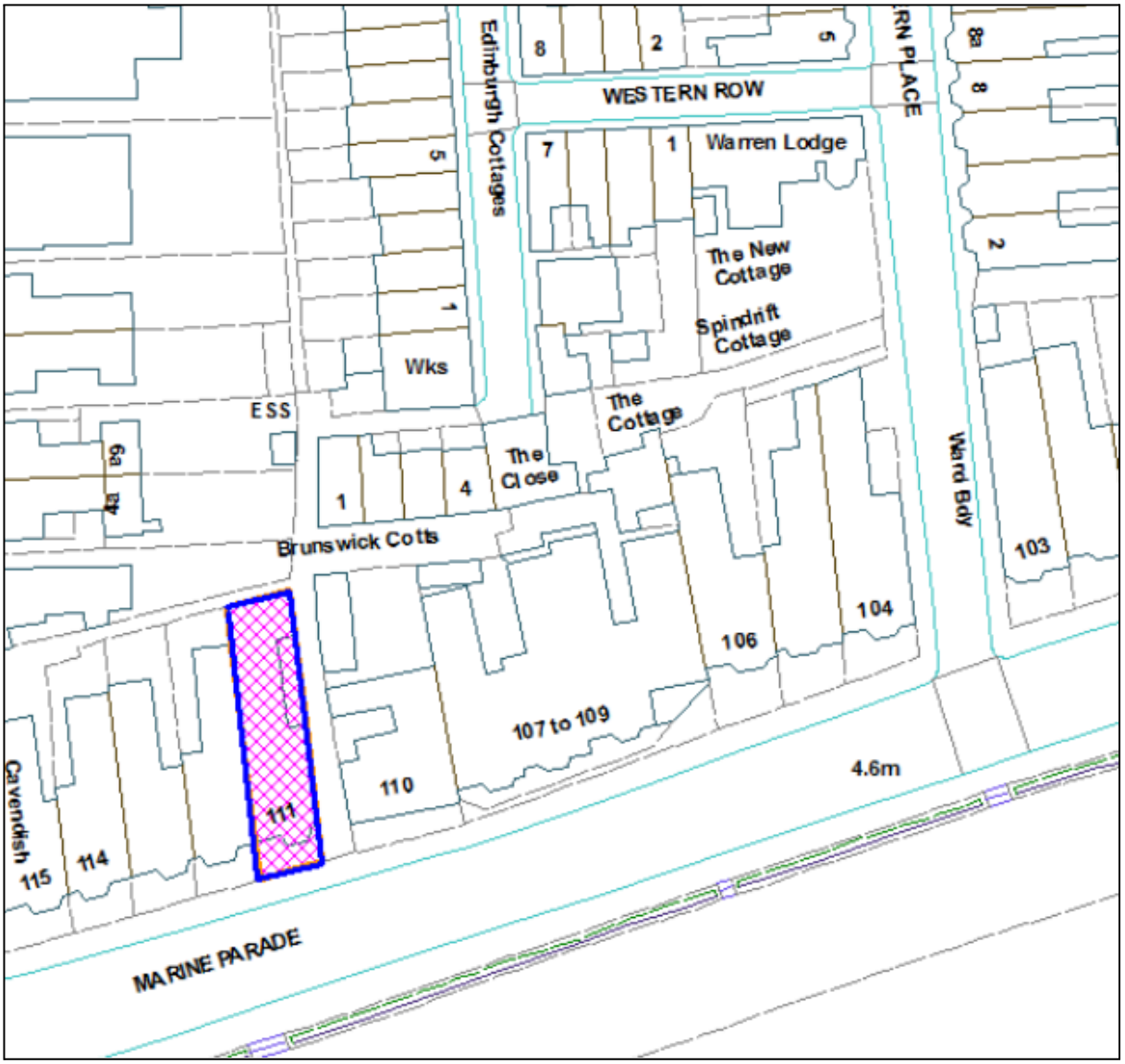
Application Number:	**AWDM/0954/25**	**Recommendation - APPROVE**
Site:	**Marine View 111 Marine Parade Worthing BN11 3QG**	
Proposal:	**Change of Use from Guest House (Class C1) to a large House in Multiple Occupation (Sui Generis)**	
Applicant:	**Leone Properties Ltd**	**Ward: Heene**
Agent:	**Miss Debbie Marriage**	
Case Officer:	**Jo Morin**	



Not to Scale

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Site and Surroundings

The application relates to the Marine View Guest House, an end-of-terrace, 3-storey plus semi-basement Victorian property located on the north side of Marine Parade facing the seafront promenade just to the west of the town centre. The building has white stuccoed elevations under a slate, hipped roof with chimneys. It has a traditional layout with a rear outrigger and a small, walled yard with external stairs on the east side of the outrigger and a flat-roofed garage building attached to the rear. The property adjoins a tarmacked publicly maintained 'twitten' to the east. The twitten runs north-south linking Marine Parade with Brunswick Cottages and Edinburgh Cottages (Western Row) beyond.

The guest house, which ceased operating in May 2025, consists of a bar, dining room and kitchen on the lower ground-floor, with 11 guest rooms (all with en-suite facilities) on the floors above, plus the former owner's 2-bedroom private accommodation on the 2nd floor.

The property is identified as a Local Interest Building within the Marine Parade and Hinterland Conservation Area.

Planning records indicate the property has been in use as a guest house since 1977. Permission was granted in 1978 for the additional use of the lower ground-floor dining room serving the guest house as a bar and licensed restaurant open to non-residents with occasional use of the forecourt for placing tables and chairs.

The site falls within EA Flood Zone 3.

Proposal

Permission is sought for a change of use from a guest house to a large house in multiple occupation (HMO) with 13-bedrooms. Following discussion, the application has been amended to reduce occupancy levels from a maximum of 23 people as initially proposed, to a maximum of 16 people in 10 single rooms and 3 double rooms on the upper ground, first and second floors. All bedrooms have en-suite provision. The entire lower ground floor would consist of a shared kitchen and dining area plus 2no WCs, plus a further shared kitchen/dining area on the second-floor.

The attached garage would be used for refuse and cycle storage.

Following amendment, the only external alteration would be to replace the existing 'up and over' garage door with a pair of bi-leaf doors, with the remainder of the opening infilled with horizontal timber slats to ventilate the proposed refuse store.

The application is supported by a Planning, Design & Access Statement and Flood Risk Assessment (FRA) by Simon Dent Associates.

The application has been called-in to the Committee for decision by Cllr Tom Ellum for determination in light of the number of objections received .

Relevant Planning History

AWDM/1726/21 Change of use from Guest house (Class C1) to 2no 2-bedroom apartments, 2no 3-bedroom apartments (Class C3) with lift access, bin and cycle storage; removal of external stairs to east side and associated elevation alterations. Permitted 21.04.2021. Permission lapsed without implementation.

Consultations

West Sussex County Council: The Local Highway Authority (LHA) has no objection from a transport/highways aspect commenting: -

"Content
No vehicular access is associated with this site, whilst pedestrian access will remain as existing. The proposals seek a change of use from 14-bed guest house to 14 bed HMO – as such, the proposals are not anticipated to give rise to a material intensification of movements to or from the site.

No vehicular parking is proposed – therefore, vehicular parking would have to be accommodated on-street or within paid-for provision, as per the existing arrangement. Under WSCC Parking Standards, the LHA would expect the existing use to provide 14 car parking spaces (at one parking space per bedroom), whilst the proposed use would be expected to provide seven car parking spaces (at 0.5 parking spaces per bedroom). Therefore, the LHA would anticipate that the proposed use would see a reduction in expected car parking demand.

Notwithstanding the above, there are comprehensive parking restrictions in place on the nearby roads that prohibit vehicles from parking in places that would be detrimental to highway safety. The LHA does not anticipate that the existing nil car parking provision would give rise to highway safety concerns, but the LPA may wish to consider the potential impacts on on-street parking from an amenity point of view.

The site is situated in a sustainable location within walking/cycle distance of local services, amenities and public transport links. Cycling is a viable option in the area, and the LHA would request that cycle parking provision be provided if there is space within the site to do so. I do note that there is a garage to the rear of the site that could be utilised for this purpose.

Conclusion
In summary, 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."

Environment Agency: No objection provided that the following condition be attached to any planning permission granted and that the details in relation to the condition be submitted and approved by the LPA: -

Condition
The development shall be carried out in accordance with the submitted Flood Risk Assessment (ref: AEG0160_BN11_Worthing_01) and the following mitigation measures it details:
• Ground-floor finished levels set no lower than 6.41 metres above Ordnance Datum;
• Sleeping accommodation will be situated on the upper ground floor and above only;
• Erection of a new perimeter wall to the amenity area of the lower ground floor.
These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

Advice is also provided to the LPA and Applicant on flood resistance and resilience measures.

Officer Comment: The EA has since confirmed that their agreement to remove a requirement for a new flood wall as they are satisfied occupants would be safe on the basis there is no sleeping accommodation on the ground floor. A flood-proof gate is recommended instead.

Southern Water: No objection in principle, commenting: -

Connection
Southern Water has indicated the exterior of the property remains unchanged. However, it has also been shown that the applicant is not proposing to use the existing connection. Therefore, as per our previous letter dated the 30th of November 2021, Southern Water will require a formal application for a connection to the public sewer to be made by the applicant or developer.

We request that should this planning application receive planning approval, the following informative is attached to the consent: "*Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water."*

Disposal of surface water
If the applicant has not already provided documentation demonstrating compliance with the surface water hierarchy reflected in part H3 of the Building Regulations, as shown below, we will require this to be provided where surface water is being considered for discharge to our network. Whilst reuse does not strictly form part of this hierarchy, Southern Water would encourage the consideration of reuse for new developments.
- Reuse
- Infiltration
- Watercourse
- Storm Sewer

- Combined Sewer.
We would like to engage with you on the design for disposal of surface water for this development at the earliest opportunity and we recommend that civil engineers and landscape architects work together with Southern Water. In many cases this may negate or reduce the need for network reinforcement and allow earlier completion of the development."

Officer Comment: The proposal is for a change of use, the drainage, WC and ensuite facilities are existing.

Sussex Police:

Police Inspector Sawyer

"In terms of the application it is a hard one to judge in that the end of the town is busy anyway and is subject of crime and disorder [sic]. We can understand the community concern, particularly with potential over concentration of HMO's in a defined area. I think the determination also needs to consider who would be housed at the location, is it supported living, emergency accommodation?

I think the important thing here should this be approved is that there should be a strong management plan with security features to ensure the safety of the residents living there and the local community."

Designing Out Crime Advisor

"Historically there are cases where houses of multiple occupancy (HMO) have given rise to instances of anti-social behaviour (ASB). To reduce the risk of this occurring there will need to be stringent management control of tenancies. This could be implemented as a condition of planning.

From a crime prevention perspective consideration should be given to the implementation of the following security measures:

The front access door to the HMO will be subject to heavy and prolonged use so needs to be fit for purpose. It will also be very important that access control is implemented into the design and layout to ensure control of entry is for authorised persons only. Tradesperson or timed-release mechanisms are not advised as they have been proven to be the cause of antisocial behaviour and unlawful access to communal developments.

Each bedroom door to the HMO must be 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 doors must be installed with a securely fixed robust planted stop, door chain and door viewer.

I recommend the postal arrangements for the HMO is through the wall, or external or lobby mounted secure post boxes. I strongly urge the applicant not to consider letter apertures within the front doors of the individual rooms. The absence of the letter

aperture removes the opportunity for lock manipulation, fishing and arson attack and has the potential to reduce unnecessary access to the block.

Due to the potential array of tenant type that may be accommodated within this property there is some concern about the potential vulnerabilities different client groups may have. I would therefore ask that there is a degree of recognition with regards to this concern and that it is acknowledged and reflected within management plans. I would also ask that management teams have the ability to signpost vulnerable tenants to access services to ensure that safe-guarding measures are maintained.

Although video surveillance systems (VSS) are not a solution to all security problems it can help deter criminals and assist with the identification of offenders after a crime has been committed. Should the applicant decide to use CCTV it is important to read the Information Commissioners Office (ICO) advice on domestic CCTV systems – guidance for people using CCTV."

Adur & Worthing Councils:

WSP: The Council's Drainage Consultant has no objection. It initially objected to the proposals, commenting:

Initial Comments

"Following a review of the submitted information, we note that insufficient information has been provided to demonstrate the application is in accordance with the National Planning Policy Framework (NPPF) and its accompanying Planning Policy Guidance (PPG).

The most up-to-date publicly available modelling from the Environment Agency (EA) shows that the site is subject to a high surface water flood risk. As the change of use introduces permanent occupancy, the vulnerability of the site will be increased. It must be demonstrated that a safe access and egress route can be achieved during the design event. Surface water flooding is unpredictable and therefore the reliance on the EA Floodline Alert and Warnings Direct service and safe refuge is insufficient.

We would recommend the application is not approved until updated information is received that addresses the above points.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 165-175 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage, and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development."

Following the receipt of a revised information demonstrating a safe escape route to a place of refuge during the 1 in 100 year flood event, WSP has no objection commenting: -

Final Comment

Following a review of the updated information, we note that sufficient information has been provided to demonstrate that occupants will have safe access and egress to and from the proposed development during a surface water flood event. Therefore, we have no objection on surface water grounds and would recommend the approval of the application.

Environmental Health - Public Health & Regulation

I have reviewed the details and consider no additional requirements are necessary regarding potential noise and vibration affecting or generated by the proposed development.

Private Sector Housing Team

The proposed conversion would mean that the property will subject to mandatory licensing as an HMO, and the Management of Houses in Multiple Occupation (England) Regulations 2006

Subject to the following, there are no grounds for objection to the intended use:

Adequate provision for the storage and removal of waste is not indicated in the application; this will be a requirement to comply with both the Management of Houses in Multiple Occupation (England) Regulations 2006 and the licence conditions.

Officer Comment: An amended plan has been provided showing waste provision within the existing attached garage building consisting of 6 x 1100 litre bins (3 x 1100 litre for refuse and 3 x 1100 litre for recycling) which exceeds the provision (4 x 660 litre bins) recommended by the Council's Waste team.

Representations

55 objections to the proposed development have been received from the occupiers of 3 (x2), 5, 6 Edinburgh Cottages; 2 (x3), 3 (x2), 4 Brunswick Cottages, Flat 2, 100 Marine Parade (x4); 106 Marine Parade; 110 Marine Parade (x2) ; Flats 2, 3, 5 (x2), 8, 112 Marine Parade; Flat 2, Cavendish Court, 113-114 Marine Parade; Flats 4 (x3), 5 (x2), 6 (x2) Cavendish House, 115-116 Marine Parade; Flat 6, Mayfair House, 11-12 Marine Parade; 3, 15 (x2), 18 Beach Residences, 123-125 Marine Parade; 2 Forget-me-not Cottages, 2, 6 (x2), 9, 14b, The Close, Western Row; Harlequin Hair, 13 Rowlands Road; 8, 11, 15, 17 (x2) Thorn Road; Homefield Garage, 18 Wordsworth Road, Cuffley (Herts); Tuddenham (Suffolk) raising the following concerns (which have been summarised): -

Intensity and overdevelopment/overconcentration of HMOs

- Overconcentration of facilities for vulnerable people in the immediate vicinity. Adding an HMO for multiple unrelated individuals potentially with higher

support needs would create an over concentration of similar uses contrary to planning policy that seeks to maintain balanced and sustainable communities.

- The proposal would create a situation with HMOs at each end of Western Row which is an overprovision.
- Too many HMOs in this area. They often bring unsavoury acquaintances to the area that do not live here; with associated antisocial behaviour in the alleyways to the front and rear of where I live.
- Concerned about the disproportionate number of HMOs concentrated in this area and the negative effect this had had on the local community leading to an increase in antisocial and criminal behaviour, and a decline in the sense of community and stability as there is a constant turnover of short-term residents. The Council should consider the cumulative impact of HMOs already present in the area and refuse this application in the interests of maintaining community cohesion, safety and quality of life for existing residents.
- Please, no more HMOs - we are entitled to a peaceful life and to be safe.
- The plans represent an over-concentration in this highly prominent seafront location and clearly incompatible with the surrounding residential context.
- The area is simply not suitable for the kind of intensified use that the application suggests. It would change the character of the neighbourhood and compromise the safety and wellbeing of residents, many of whom are elderly.
- This area already struggles with the highest density of HMOs in Worthing and the associated consequences of increased antisocial behaviour, noise and rubbish. Please consider the detrimental impact of allowing an additional 24 people in a small area already saturated with high density housing.
- Impact on services and health infrastructure; accessing local GP services already over-run, dentists are taking no more patients in our area, schools are full.
- Police and ambulance resources are already stretched and you have to take into account the future wellbeing of local residents.
- This Victorian housing stock was never designed to sustain such a high residential density. The building's age and infrastructure make it unsuitable for such use particularly in terms of drainage, utilities and fire safety.
- This area of West Worthing is already weighted down with vast numbers of bedsits that accommodate the most antisocial, grossly behaved individuals being housed in beautiful protected buildings in excellent locations, moments from the seafront and high street. I witness daily theft, violence, excessive drinking, substance abuse and abuse of the business owners and workers. Properties are unkempt and provide problems for their neighbours.
- Queens Road is already a problem area both in the daytime and in the evening with unruly behaviour, swearing and drugs dealings . This is definitely already an antisocial behaviour area. The old shelter on the seafront is also as above. Allowing the application will make matters worse.
- We have many issues with people using social housing in Rowlands Road, who spend their day and evening on the promenade and in the shelters and on the beach drinking and taking drugs. At night-time, it is not pleasant to walk the dogs, and my 35-year-old daughter does not feel safe walking home at night.
- The drunken and drug - fuelled antisocial behaviour that already plagues the seafront could increase greatly if there is an even larger number of troubled

individuals in such a concentrated area of the town. Drunken and drug-fuelled behaviour from potentially greater numbers of residents all in one place will force women and girls to retreat further from our beautiful seafront. The sense of threat has a dramatic impact on the ability of women and girls to live in freedom.

- There are too many vulnerable people populating the 'West End' of Worthing putting enormous pressure on the community.
- The former 'Polands' on Rowlands Road, which now operates as a halfway house will soon also be a hub for the homeless and drug-addicted. The old Bingo Hall is being flattened and turned into residential homes, alongside all the problematic bedsits along Rowlands Road, which again the police frequent often. Housing many of these individuals so close to retail outlets and on the seafront runs such a high risk of temptation and ease for theft, it detracts people from visiting the area.
- Worthing already has a high number of HMOs and Councils generally seek to avoid an overconcentration in one area as this can unbalance the community. Granting permission would set a precedent undermining the stability of the area.
- Overdevelopment: Although I understand we need more affordable housing this development is not suitable for this property and the previous application for 4 flats would be far more appropriate.
- There are already regular problems with drainage on the block, with a drainage truck being called out to unblock the sewer behind 111-116 Marine Parade several times a year. The addition of 24 residents on the same sewer main is guaranteed to cause further complications with drainage.
- Refuse storage and collection is an existing problem for residents on the block, with the current limits placed by the council on bin space often leading to bins that are overflowing by collection day. I am sure additional problems with hygiene and refuse will be caused by the addition of 24 residents to the block.

<u>Impact on tourism/local economy</u>

- The proposal will negatively impact tourism and the local economy; no tourists want to stroll past an HMO. This could be the start of the decline of the area in line with Blackpool, Clacton, Skegness and so many other seaside towns which have spiralled into social and economic doldrums.
- It is sad to see yet another seafront hotel in an area where we need hotels has disappeared.
- Local businesses rely on trade from visitors to the guest houses/hotels. We need this property to stay as a hotel. We have lost so many B&Bs and smaller hotels in the town and there is often a shortage of this type of accommodation that is cheaper than the bigger hotels.
- The property is located on Worthing seafront, a key tourist destination that relies on its reputation as a safe, welcoming, family-friendly resort. It is accepted that HMOs and children's homes have to go somewhere but not the seafront location. Please help it to stay a nice town to visit, and people to contribute to our business economy.
- Turning a well-established guest house into an HMO is wholly irresponsible. You will be removing a traditional part of our seaside town, part of the 'appeal'

of the area for out–of-town visitors. Greed-driven with zero-consideration for existing residents and businesses. We should be encouraging out-of-town people to visit our town and stay in and experience traditional seafront B&Bs. This footfall is greatly needed in our town to sustain the high street.

- The seafront is a key part of the town's appeal to visitors and residents. Converting prime seafront accommodation into a high density HMO conflicts with the Council's stated aims of supporting tourism, regeneration and enhancing the attractiveness of the seafront.
- This is a premium seafront area and the property should be developed as a small tourist hotel to encourage and support tourists into Worthing.
- The Travelodge, Premier Inn, and The Burlington have all been working really hard to support our tourism industry (along with The Whiskey Rooms, The Signal post, Malt etc.). We desperately need income from tourism in the town and negative reviews on Tripadvisor citing perceived and actual antisocial behaviour will dampen business for all these fantastic tourist ventures.

<u>Seafront and local character</u>

- Integrity of Worthing and Marine Parade. Contrary to planning policy which places the emphasis on protecting the seafront's role as a high quality residential and visitor destination.
- Worthing seafront has a great and historic character. Maintaining the worth of Worthing as an attractive seaside town is of the utmost importance and is reliant on Marine Parade.
- The Council should consider the bigger picture and the future of the town.
- The seafront is the 'jewel in Worthing's crown' and this change of use will have a very negative impact on the Council policy of enhancing the attractiveness of the seafront.
- The Council should be committed to improving the seafront, the face of how the town is perceived.
- This proposal totally contradicts the local plan to protect our beautiful historic town and promote it as a high quality residential and visitor destination. It needs to be protected.
- Concerned about the significant impact of the proposals on the character of the Conservation Area. The NPPF requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Failure to provide a Heritage Statement indicates a lack of understanding from the applicant of the significance of the heritage assets affected and fails to provide evidence of how the proposal has been designed to conserve or enhance the character of the area.
- The proposal is contrary to policies DM1, DM2, DM5, DM7, DM16 of the Local Plan insomuch as these policies require an application to respect the character and location of the site, the character of the surrounding area and not to have an unacceptable impact on neighbouring properties. The introduction of a large HMO would be out of keeping with the established character of the seafront.
- Use of the small external space by a large number of residents and their visitors has the potential to cause substantial noise and disturbance, spilling

onto the street. Misuse of this highly prominent exposed space will have significant detrimental impacts on this prime section of seafront and in turn Worthing given the importance of the promenade to residents and tourists.
- The previous planning permission granted to convert this property into 4no flats would be more appropriate and result in high quality housing suitable to the area and help rebalance the housing stock.
- The property is more suited to be converted into 3 or 4 flats occupied by needy families. This would be in-keeping with neighbouring properties.
- The addition of a 24-person [sic] HMO will be one of the largest in Worthing.
- This area doesn't need another large HMO putting extra pressure and negatively impacting family dwellings in the community.
- Concerned that a beautiful building in an attractive, well-maintained seafront terrace is not the right location for an HMO.
- The seafront along Marine Parade from Heene Terrace to the Lido comprises many fine grand buildings evoking a certain charm and character. It is simply not the right location for an HMO property, and if planning is given, it will bring about a rapid decline to one of Worthing's best assets.
- The introduction of a dense multi-occupancy use in this sensitive heritage and tourist area would likely undermine visual and cultural integrity.
- The Seafront Investment Plan highlights the seafront as one of the town's greatest assets with a vision for revitalisation through sensitive enhancement and public realm improvements - not residential conversions.

<u>Impact on amenity/antisocial behaviour</u>

- Higher occupancy levels associated with this type of housing with greater comings and goings at unsocial hours compared to a single household will cause significant noise disturbance for neighbours particularly in this seafront area where properties are sited close together.
- The noise from this type of development will be excessive, with the possibility of residents staying outdoors especially during the Summer months. This could distress older residents and young families.
- I have had problems with the HMO in Western Row and do not need more problems with another much larger HMO. We need more investment in the area, and no more drink, drugs and shoplifting. Poor management and upkeep of some HMOs in the immediate area has caused problems with limited control over noise or behaviours resulting from too many people housed in one property.
- Police already overstretched in dealing with incidents of antisocial behaviour in the adjoining Queens Road. To expect them to deal with additional potential problems is unreasonable.
- The nearest HMO has resulted in unacceptable litter and noise, a violent brawl leading to hospitalisation and a police dispersal order following almost daily visits. A previous neighbour described events as "like a war zone" when surrounded by a group of youths with bricks. The current proposal will only worsen the situation and increase fear and anxiety for the largely elderly residents. Worried about our safety at night.
- Concerned that the steps in front of the property will become a gathering place for smoking, drinking, drug-taking and play loud music at all hours.

- The owners of the previous guest house managed the property extremely well and kept up an excellent standard of behaviour from all their guests. Our experience of other HMOs gives us no confidence that the new owners/management could guarantee this would continue.
- An increase of up to 23 individuals into this small largely elderly local community will create noise and disturbance with comings and goings at extended hours.
- This area in Rowlands Road and Queens Road has experienced too many disturbances and too much insecurity, especially for the elderly.
- The local area including the beach opposite is already blighted by significant antisocial behaviour. Street drinking, drug taking, drug dealing, noise (yelling, swearing, music etc.), shop lifting, vandalism, intimidating behaviour, littering, public urination, fighting in the street and regular police call outs to existing HMO's in the area due to issues with tenants. As an illustration of how unpleasant the area has become we had a rampaging drug user who attacked a delivery driver with a knife in May 2023, assaulted a local resident in a random attack the following month, skipped bail for these and other offences, was finally apprehended in a day long police siege in May 2024, but was subsequently released back into the community and was only evicted from his lodgings nearby in Queens Road after ramming a police car whilst driving unlicensed in March this year (as reported by the Worthing Herald). I don't need to use too much imagination to envision the amplification of these problems that are almost certain to occur should the former Marine View Hotel be converted into an HMO housing 24 residents on a temporary basis.
- I am in full agreement with other objectors that there is an extremely high likelihood that residents will congregate on the steps in front of the property, the promenade/beach opposite and in the alley way adjoining the property to smoke, drink, noisily socialise etc. at all times of the day/night. Such behaviour would seriously negatively impact neighbours, local residents and visitors to the town seeking to enjoy the promenade/beach.
- With the nature of the accommodation being temporary, there will be a constant revolving door of tenants, some of whom will undoubtedly bring issues, based on the experience of living near existing local HMO's of the same type.
- With 24 people cohabiting in small, nigh on claustrophobic rooms, they will naturally spend time on the steps outside and the shelter opposite on the promenade, and it will become a very obvious, and unpleasant environment.
- No one can foresee what the future residents will be like and do not presume anything in terms of whether they are decent, respectful, law-abiding, hardworking, clean and honest people. However, concerned that if there are not adequate facilities in the HMO it will cause discontentment and antisocial behaviour. There have been previous problems with antisocial behaviour in the twittens along and behind Marine View, with drug-taking and dealing, unsavoury characters drinking and smoking and causing disturbance with their antisocial behaviour. If residents don’t/cannot work they will become bored with nothing to do. Who is going to make sure the residents will respect and be respectful of the area?
- We suffered noise disturbance during Covid with people using the fire escape as their own outside space through the day and night, using their mobile phones at length and volume without consideration for others.

- Neighbours and friends should not feel wary, scared or reluctant to go out or walk home alone for fear of violence, abuse or victimisation.
- Negative impact on community cohesion and safety. This community is a lovely mixture of wonderful people that all look out for each other, a beautiful community spirit. We should not have this foisted on us in our latter and declining years. We want to live peacefully without problem tenants and residences disturbing our home life.
- Concerned about increased noise/nuisance and anti-social behaviour, especially in the pedestrian alleyway next to the property. The alleyway has only one streetlight which is lit for only 5 hours per evening.
- The proposed HMO without proper and enforcement management could result in a difficult situation for other residents and visitors to the area.
- The area behind and to the side of this property has already been the site of crime-related activity as Police records would verify.
- There have been persistent issues with drug and alcohol-related activity in the alleyway leading to late night disturbances, noise and rowdiness all having a negative impact on residents' lives.
- We use the alleyway for easy access to the seafront and it is easy for wheelchairs, but the prospect of being confronted by undesirables leaves me with concern. Antisocial behaviour, street drinking and using the beach as a toilet will increase and the residents will want to socialise and can't do this in single rooms.
- I am a single person living here on my own close by to the proposed development and given the recent problems elsewhere that have been highlighted in the news this will not make this area (that is already under stress with increased anti social behaviour) any safer.
- There are alcoholics and drug-users causing issues at the top end of Thorn Road - recently in the 'Cats Protection' shop entrance, urinating and spreading faeces on the shop window. Issues have been reported to the Police. My family has witnessed first-hand incidents of shoplifting and abuse to staff and customers in local shops. Problems will escalate if another HMO is granted.
- The capacity being 24 people is far too many to house in this space. Particularly if the residents are vulnerable, so many living in such close proximity will create a pressure cooker situation.
- I live next door with a baby/young family. Concerned about noise at all times of day and night, smoking which poses a health risk to my family and people hanging around at the front and in the side alley. There are some individuals that base themselves on the beach and in the alley who regularly engage in antisocial behaviour and fear this will become worse.
- Police have been involved on numerous occasions where residents from other HMOs gather along the prom - we have witnessed aggressive, drunk, foul and antisocial behaviour. On occasion the behaviour is so offensive I feel uncomfortable and at times unsafe walking past even in the day time.
- The Council has a duty of care to the local population especially children safeguarding their needs. Thorn road is a residential street with many families and young children. Families want to feel safe walking to the shops and not worry about who they will encounter and what their children may witness.
- The profile of how the site was previously used will be very different from that now proposed given the proposed concentration of people on the site with no

seasonal variation in occupancy levels, and the way in which the building will be used, representing a significant increase in activity, noise and disturbance.

- The existing external staircase has rarely been used as it is a fire escape. It is likely to be used more heavily as the only secondary staircase for the entire building and providing a small amount of outdoor space where the occupants could congregate leading to significant noise and disturbance. This will be exacerbated if the site is unmonitored with no on-site management.
- Residents using the external stairs in this way would have an unobstructed view into the courtyard garden, ground-floor reception room, first-floor rear bedroom, bathroom and landing of 110 Marine Parade, destroying our privacy.
- There is no provision within the planning document detailing how the property will be managed. Will there be on-site staff, will staff cover be 24/7? If not, how will residents be monitored? What measures will be put in place to ensure there is no antisocial behaviour or disturbance to neighbours. Are there restrictions on the time of day that residents can use the outside space? Without an effective and comprehensive Management Plan the risks to the local community are exacerbated.
- There will be no way of managing comings and goings to the HMO or managing numbers of individuals commensurate with the numbers quoted in the application submission.
- We have had appalling experiences of a nearby HMO in Western Row with the police called on a daily basis, now we have to look forward to people who have arrived here by dinghy, uninvited and unaccountable or undesirables to a place where housing shortage is widely recognised. I fear if turning into an HMO it will be rented to house men who have illegally entered the UK and who are unvetted. The proposal is clearly based on the short-term financial gain that could be made in connection with illegal immigrants and asylum-seekers.
- HMOs generate more waste than single households. Inadequate plans for waste storage or collection generated by the occupants. This could result in overflowing bins, litter, and vermin.

<u>Parking Pressures</u>

- Increased parking pressures. The proposal will significantly impact available parking which has been reduced recently with the introduction of electric parking bays.
- Severe lack of parking in the area will be exacerbated;
- Some HMO residents will be likely to own a vehicle and any additional demand for parking will place further strain on residents and potentially compromise highway safety.
- Parking in permit zone B is virtually impossible. The issue for further permits to residents will make parking even more of a challenge.
- Most days I cannot park near my house.
- We should be trying to make parking easier for visitors to the town since the local multi-storey car park closed.
- The WSCC consultation response suggests that the LPA consider the potential impact of on-street parking from an amenity point of view - has this been done?

- The number of occupants has the potential to generate considerable additional car/van usage, placing heightened pressure on parking. There is already a significant lack of resident parking, even more acute in the Summer months.
- Existing residents already experience significant difficulty in securing a space in the locality, with parking on double yellow lines already a daily occurrence, out of necessity. While many potential residents of the proposed HMO may not be car owners, the above problems with parking exist while the Marine View Hotel is not in use. So even a handful of additional cars will bring further unwelcome parking problems for local residents and visitors to the town/beach.
- Increased parking demand generated by the development will lead to congestion, illegal or unsafe parking and increased risks for cyclists and pedestrians.

Adequacy of Accommodation

- Has adequate provision been made for refuse storage and cycle storage provision?
- The plans indicate very cramped living space and the number of occupants far exceeds normal residential occupancy;
- Provision of outdoor space comprising only the front sunken terrace is unacceptable for the number of residents. It is very small with no privacy or green space.
- The provision of kitchen and communal space appears inadequate for the number of residents. Coupled with the small size of many of the bedrooms this is likely to make the external area more appealing and heavily used. However, residents are likely to overflow into public areas with the potential for negative effects felt across the wider area.
- Proposed bedrooms are small and poorly configured with minimal storage space. Residents will not be able to enjoy a good standard of living.
- No information provided on how the property will be adaptable or enable access for disabled people. The only access to the property is up multiple steps with no apparent lift access to the upper floors.
- It is unclear if the proposed layout will meet current HMO licensing requirements for fire safety measures, adequate space, shared amenity ratios and waste disposal.
- Given the age of the building stock and likely outdated structure it is improbable that stringent safety measures for fire risk can be met without extensive and intrusive alterations raising serious concerns for occupant safety.

Other comments

- Absence of a Design and Access Statement and Heritage Statement published on the Council website. This impacts the ability of the public to fully understand the proposals and make reasoned assessments of its impacts.
- Private HMO landlords do not look after their properties and they fall into disrepair with rubbish left outside encouraging seagulls and rats.

- Insufficient publicity of the application by the Council.The Council's procedure of notifying all the people that will be affected by the change has not been followed. The date should be extended to give everyone the opportunity to express their viewpoint.
- I also think it is very unfair that you as a Council have given us only seven days to object to this application. We were handed these letters regarding this planning application only today 21st August. This does not allow other residents to possibly object, as this is the peak two week summer holidays in this country and they may not have even seen this letter, hence no time to respond.
- What is required is low cost housing for families to live and thrive.
- The introduction of such a large-scale HMO would have a detrimental effect on neighbouring property values, damaging the long-term investment of residents who have contributed to the area for many years.
- There are plenty of empty flats available in and around West Worthing with new developments going up.

Applicant's reponse

The following statement has been provided by the Applicant's Agent in response to the objections received:

I write on behalf of the applicant to address the comments submitted by neighbours in respect of the above planning application. The comments refer predominantly to the future management of the building, parking, noise and disturbance, anti-social behaviour, personal safety, refuse and waste storage, and the impact on the character of the area and tourism.

Worthing Borough Council currently faces a housing crisis, as there is not enough social or emergency housing to meet the needs of local residents. According to the Council's own reporting, there are approximately 1,900 local households on the Worthing Council housing waiting list. It is against this background that this application has been submitted. The application proposes the use of the building as a house in multiple occupation (HMO) for 23 people across 13 single and double rooms.

[*Officer Comment*: Since amended to comprise 16 people within 10 single and 3 double rooms.]

<u>The Applicant's Experience with HMOs</u>
Over the last 10 years, my client has successfully run three other large HMOs within the Worthing & Adur district. During that period, they have received no formal complaints from neighbours or tenants regarding noise, anti-social behaviour, or breach of licensing and safety regulations. They have consistently adhered to planning, licensing, fire-safety, HMO management, and operational requirements. They work collaboratively with the Council's Private Sector Housing Team to ensure properties remain safe, compliant and well managed. They maintain all of their properties to a high standard, ensuring they provide good quality, safe, and affordable housing for local people.

Tenant Profile & Affordability

Tenants are typically single adults on limited incomes who cannot afford a studio or one-bedroom flat in the private market. They are often key workers in the health, care, retail, and hospitality sectors, who support the local economy. Many do not own cars, as the costs of purchase, insurance, parking, and maintenance are prohibitive.

Employment Opportunities

To illustrate where many of tenants living in HMO's find work, below are some of the largest employers within approximately 15 miles of Worthing:

- *University Hospitals Sussex NHS Foundation Trust (Worthing Hospital, Southlands Hospital, Princess Royal, Royal Sussex County) – approx. 20,000 staff*
- *HM Revenue & Customs (HMRC), Worthing – approx. 1,000 staff*
- *Environment Agency, Worthing office – approx. 250 staff*
- *Northbrook / MET College – approx. 500 staff*
- *Retail & Hospitality Sector (Worthing town centre, seafront, tourism businesses) – several thousand across multiple employers.*

These institutions and businesses provide a mix of healthcare, financial, education, technical and service roles. Many are shift-based or entry-level positions which do not pay high wages. Affordable local housing is critical to enable these employees to live locally.

Comparison with Guest House Operation

When the property previously operated as a guest house, rooms often accommodated up to four adults per room. Visitors typically arrived with vehicles, placing significant pressure on local parking. Guest turnover was high, with frequent short-term arrivals and departures. By contrast, as a permanent HMO, occupancy will be lower, tenants will be long-term, vehicle ownership will be much lower, and residents will integrate into the neighbourhood as stable community members.

Housing Need in Worthing & Adur

Worthing & Adur Borough faces a well documented housing affordability gap. Data collated in the Strategic Housing Market Assessment for Adur and Worthing shows that Worthing borough has a higher 'house price to earnings ratio' compared to the national average (11.7 compared to 7.7). This means that property is less affordable when compared to how much people living in the borough earn. This puts more pressure on the rental sector, driving up rents and pushing more working people into shared accommodation.

Average house prices and private rents have risen significantly, leaving many single people unable to secure independent accommodation. Council assessments highlight a shortage of affordable and shared housing options, especially for single adults on low incomes. Without HMOs such as this, many residents would face homelessness or relocation away from their support networks and employment.

Addressing Specific Objections

Parking & Traffic – The majority of tenants do not own cars, significantly reducing potential impact. There will be fewer vehicle movements compared to the historic

guest house use. The property is close to bus routes, train stations, and cycling/walking routes.

Noise & Anti-Social Behaviour – My client's track record across three HMOs shows no complaints in 10 years. All tenants are referenced and vetted prior to moving in, unlike transient guest house visitors. Clear tenancy agreements and house rules are enforced, with swift action taken on any breaches.

Refuse & Waste Management – Dedicated bin and recycling storage areas will be provided on site. Waste will be managed in accordance with Adur & Worthing Council collection schedules. Tenants are required under house rules to ensure proper use of these facilities.

Personal Safety & Security – The property will benefit from a cloud-based CCTV system covering communal areas and entrances, ensuring resident and community safeguarding. Regular inspections and ongoing management will maintain safety standards.

Overcrowding – Occupancy is capped at 23 people by the HMO licence. [*Officer Commen*t: Since amended to comprise 16 people within 10 single and 3 double rooms.]
However in reality most rooms will be occupied by a single tenant, with only a small number of doubles. This is fewer overall individuals than the property hosted when run as a guest house.

Impact on Character of the Area – Residents will be long-term neighbours, not short-term visitors. The building has historically been in intensive residential use as a guest house. The proposed HMO use will not materially alter the character of the property or the wider area.
Tourism Impact – Worthing retains a strong supply of hotels, guest houses, and Airbnb accommodation. The town's visitor economy will not be materially impacted by this change. In contrast, there is an urgent shortage of affordable housing, which this proposal directly addresses.

Impact on Local Services – Tenants are primarily single adults, placing minimal demand on schools and children's services. Numbers are controlled and capped by HMO licensing.

This proposal directly responds to the acute housing need in Worthing & Adur. It provides safe and affordable housing for local people, especially single adults in low-income and key worker roles. It will reduce negative impacts compared with the former guest house use, while being responsibly managed by an experienced landlord with a proven track record

We fully understand and respect the concerns that have been raised by local residents during the consultation process. Issues such as parking, noise, anti-social behaviour, and the character of the area are very important to both the community and ourselves.

We would like to reassure neighbours and the wider community that we take these matters seriously. The landlord's experience of running similar HMOs locally has shown that, with responsible management, clear tenant vetting, and ongoing communication with the Council, these concerns can be effectively managed and mitigated. Their commitment is to provide well maintained, safe, and good quality accommodation that integrates into and supports the local community, rather than disrupts it.

The following further comments have been received in response to this Statement:

- There is an apparent inconsistency in the supporting documents concerning the proposed tenant profile of the HMO. The supporting statement provided [by the Agent] in response to representations received states that the tenant profile of the proposed HMO will typically be key workers. This implies tenants will be employed and have 12 month tenancies rather than being in need of emergency accommodation and housed temporarily. On the other hand, the initial submission documents refer to discussions with the Council's Acquisitions and Landlord Support Co-ordinator outlining that there is an urgent need in the Borough for emergency and social housing and temporary accommodation. This appears to contradict the claims made in the subsequent supporting statement calls into question its veracity.
- The Applicant (Leone Properties Ltd) is a registered company operating as a company 'buying and selling their own real estate'. i.e. not for owning and running HMOs. Therefore statements made about the Applicant's experience of running HMOs in the Adur and Worthing area should be clarified and substantiated.

The following further comments have been received from the applicant in response to the updated Design & Access Statement (26/11/2025):

- The amended Design & Access Statement (26/11/2025) highlights in Section 1.3 that the Applicant discussed the proposed change of use with the Council's Housing Officers. This implies that the proposed HMO was effectively given the go ahead by the Council's Housing Officers prior to the property being purchased by the Applicant rendering the planning consultation a mere formality and the outcome of approval of the planning application all but guaranteed. I find this extremely disturbing and needs to be fully explained and transparent. The Council cannot be considered an impartial or neutral arbiter of the planning application process.
- The amended Design & Access Statement (26/11/25250 does not include or comment on the consultation response from Sussex Police nor address the issues raised therein, and does not address many of the safety concern issues raised in neighbour letters.
- The amended Design & Access Statement (26/11/2025) does not alleviate significant concerns about this application with the numbers of bedrooms and occupants constantly shifting in the various documentation accompanying the proposals.

1 representation in support has been received from the occupier of 3 Milton Street commenting:-

- Worthing needs more low-priced accommodation for people who can't afford to rent a flat;
- Any environmental issue (waste, noise pollution, traffic) would be no worse than the former use as a hotel and bar when full;
- An HMO is a better use for locals than a failing hotel which might become derelict and a great shame on the seafront.

Relevant Planning Policies and Guidance

Worthing Local Plan 2020-2036:
SP1 Principle in Favour of Sustainable Development
SS1 Spatial Strategy
DM1 Housing Mix
DM2 Density
DM5 Quality of the Built Environment
DM6 Public Realm
DM12 The Visitor Economy
DM15 Sustainable Transport & Active Travel
DM16 Sustainable Design
DM17 Energy
DM20 Flood Risk and Sustainable Drainage
DM24 The Historic Environment

Supplementary Planning Document 'Sustainable Economy' (WBC 2012)

Relevant Legislation

The Committee should consider the planning application in accordance with:

Section 70 of the Town and Country Planning Act 1990 (as amended) provides that the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations

Section 72 Planning (Listed Building & Conservation Areas) Act 1990 requires the Local Planning Authority (LPA) to pay special attention to the desirability of preserving or enhancing the appearance of the Conservation Area.

Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

Principle of Proposed HMO Use

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.

The Worthing Local Plan was adopted on 28th March 2023. Policy SS1 sets out the Housing supply over the period 2020-2036 and gives a total figure of 3,672 (an annual target of 230 dwellings per annum). This housing target is a 'capacity-based' figure based on the level of housing that can be delivered within the Plan period having regard to identified constraints and development capacity. It is recognised, however, that this target delivery rate for housing will fall significantly below the level of housing need of 14,160 dwellings identified over the Plan period.

Policy DM1a) 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 DM1c) 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).

<u>Loss of Guest House</u>

Paragraph 85 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 86 states that planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.

The visitor economy is of significant importance to Worthing's local economy and the Council has taken a proactive approach to enhancing the sector through various strategies including proposals that bring forward key aspects of public realm works and other opportunities that aim to make for a safe, attractive and inviting environment for people to want to visit. The policy approach with the Local Plan supports this wider objective with the aim of building on the town's strengths to develop and enhance existing and new visitor attractions and visitor accommodation to meet current and future needs. Policy DM12 does this by encouraging and

supporting the provision of new visitor infrastructure and protecting existing viable infrastructure and assets whilst allowing flexibility to adapt to changing demands.

Evidence within the Adur and Worthing Hotel and Visitor Accommodation Study (2013 and Update 2016) confirms that there is an ongoing market demand for a variety of new visitor accommodation in Worthing. Since the last update in 2016 the Borough has seen the Premier Inn open plus some investment in existing stock including the provision of 19no additional guest rooms at The Railway Hotel close to Worthing rail station, 14no new hotel rooms at the Coach & Horses in Arundel Road, and new models of guest accommodation including the provision of 9no. new rooms with related facilities at 'Sleep' in Richmond Road.

However, there has also been a number of hotel and guest house/B&B closures and a significant growth in private room and entire home lettings through Airbnb and other online booking platforms. It is recognised that whilst the latter adds to the variety of accommodation available to visitors it can negatively impact on the viability of existing accommodation providers, more specifically guesthouses and B&Bs, as unlike Airbnb type accommodation they are subject to more stringent regulations and additional costs.

Policy DM12 recognises this challenge and requires the individual circumstances of each proposal to be assessed at the time of the application. The overall policy approach is to retain visitor attractions, facilities and accommodation to support the visitor economy, but not to retain them where they are no longer required or are no longer viable.

The loss of the existing guest house accommodation was accepted in granting the previous planning permission in 2022 (AWDM/1726/21) for the change of use and development of the property to provide 4no. flats. Although there is no more recent marketing information since then, the evidence submitted at the time, including bookings analysis for the 4 years between 2017/18 to 2020/2021 showed that occupancy rates fell from a high of 63% in 2018/18 to 42% in 2019/20 and 25% in 2020/21. It was determined that the significant fall in occupancy could only partly be attributed to the Covid pandemic. Detailed trading 'Profit and Loss' accounts showed that the business was already operating at a loss in the year ending 31 May 2019 (prior to the pandemic) with the extent of the loss significantly worsening in the year ending 31 May 2020 (only 2 months into the first 'lockdown').

However, despite this, the guest house continued to operate until May 2025. The above-mentioned planning permission lapsed without implementation in April 2025 and thus has only limited weight in the determination of the current application.

A viability statement has been prepared by the Applicant in support of the current application to demonstrate that the ongoing operation of the guest house is no longer economically viable. It states:

"The property historically operated as a seasonal guest house, opening from March to October only, as the winter months were not financially viable. The previous owners maintained average occupancy levels of 72% in 2022, 73% in 2023 and 2024, but average room rates declined significantly from £121 in 2022, to £106 in

2023, £91 in 2024, and had the Guest House remained open would have been projected to fall further to approximately £76 in 2025. This equates to a 37% fall in achievable room rate over three years despite stable occupancy, demonstrating structural rather than operational decline.

A review of current online listings for comparable bed and breakfast accommodation in Worthing demonstrates that market rates remain low and highly competitive. Rooms in similarly presented and well-rated guest houses are currently advertised between £42 and £78 per night, many including breakfast and some offering free on-site parking. This confirms that even well-maintained establishments must operate within a limited price band to attract bookings. To remain competitive within this market, 111 Marine Parade would therefore have been required to continue discounting its room rates to similar levels, further reducing already marginal revenues. Given the property's larger scale, higher maintenance obligations and lack of dedicated guest parking, it would be unable to compete profitably with smaller, lower-overhead operators charging these rates."

The Statement goes on to explain that in the years, 2022, 2023 and 2024 the Guest House maintained a 73% average occupancy during the months it was open. Based on 11 rooms, a projected average nightly rate of £76, and an average annual occupancy of 73%, the gross annual turnover is calculated as £222,750 gross annual income. Annual operating costs (including mortgage repayments, business rates, staffing, energy costs, building insurance, breakfast food provision, booking platform commissions etc.) are calculated at £252,375 resulting in an annual operating shortfall of £29,625 (-13%) before any allowance for investment, owner drawing or contingencies. Key factors undermining viability are identified as:

- energy cost inflation - with commercial energy tariffs having increased by approximately 70-80% since 2022;
- High dependency on online booking platforms charging 15-20% commission;
- Seasonal demand - limited Winter trade makes year round operation unsustainable;
- Rising staff and compliance costs exceeding inflation;
- Maintenance burden due to the size and age of the property plus its coastal exposure;
- Rising insurance and mortgage rates eroding profitability.

The Statement concludes:

"Even assuming above average occupancy and tight cost control, the property cannot viably operate as a guest house without incurring financial losses. Rising operational costs, falling achievable room rates, and reliance on high commission booking platforms make the use unsustainable. Conversion to a well managed, long term HMO therefore represents a more sustainable and socially beneficial use, contributing to Worthing's urgent need for affordable housing supply and safeguarding the building's upkeep."

The Council's Planning Policy Officer accepts the submitted viability evidence and on this basis has raised no objection to the loss of the guest house accommodation.

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:

i) The impact on the mix of dwellings locally;
ii) The effect on the character of the area, including the historic character and appearance of the conservation area;
iii) Residential amenity of future occupiers;
iv) Effects on neighbouring occupiers;
v) Flood risk;
vi) Highway safety and access.

Points i) - iv) encompass considerations set out in policy DM1 ((f) i-iv)

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) requires consideration of the site context, character of the surrounding area and impacts on adjoining owners when establishing the optimum density of development.

This property forms part of a Victorian seafront terrace building (Nos 111-116), one of several along this stretch of Marine Parade. The grand scale of these seafront Victorian villas lends them suitable to subdivision into smaller units. All but the application property in this block are in residential use having been converted into flats over the years. No.112 consists of 8no flats, Cavendish Court (113-114) consists of 17no flats. Most recently, Cavendish House (No.115-116) comprising the former Cavendish Hotel, has been converted into 10no flats (AWDM/0681/16 refers).

Other neighbouring properties are also in residential use, including No.110, a single dwelling house, and further to the east Claydon Court (108-109) consists of 19 flats.

To the north and west of the site is a short row of 4no. 2-storey terraced cottages, Brunswick Cottages, accessed from the twitten/alleyway linking Marine Parade and Edinburgh Cottages. The latter consists of a terraced cul-sac-sac made up of 10no modest, 2-storey cottages, linking to Western Row to the north and east.

The age and nature of the surrounding building stock together with the compact layout of historic streets results in higher residential densities than other more suburban areas of the town and Borough.

These town and edge of centre wards typically have higher numbers of HMOs owing to the age and nature of the building stock, often comprising larger scale properties, also often comprising former care homes or guest houses/hotels.

Whilst the proposed HMO would increase the percentage of HMOs in Heene ward this is not considered to represent an unacceptably high concentration of HMOs compared to other forms of residential accommodation.

There clearly remains a good mix of housing types in the immediate vicinity despite perceptions to the contrary outlined in the third party comments. In the absence of any set numerical limit or specified threshold specified within policy DM1 regarding the provision of HMO accommodation it is difficult to argue that HMOs represent a dominant type of accommodation in this area, or that the current proposal would lead to an overconcentration of such uses in the immediate vicinity.

Visual Amenity and Effect on the Character of the Conservation Area

The Council has a statutory duty to have regard to the desirability of enhancing or preserving the character or appearance of its conservation areas. Paragraph 212 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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.

Policy DM6 states that the enhancement of the public realm, particularly the town centre and seafront is an integral part of the strategic objectives for the town.

Policy DM24 states that development in conservation areas will be required to be of a high standard of design and materials so as to respect, preserve and enhance the character and appearance of the area. Local Interest Buildings have been identified for their contribution to the character of the area in which they are located. Development proposals should respect, support, and where possible, positively contribute to the essential character of these heritage assets.

The Marine Parade and Hinterland Conservation Appraisal identifies this section of Worthing seafront as particularly important. Its original 19th Century form remains largely intact, mainly comprising three to four storey properties characteristically Victorian in appearance. It states that along this section of the seafront individual buildings or terraces display varied architectural details but common elements serve to unify the frontage to create a cohesive and characteristic seafront. The wide promenade, elegant street lamps, a decoratively detailed period seafront shelter, and the adjacent beach and sea establish the seaside character of the area and the setting for this attractive frontage.

As part of the initial proposals it was proposed to infill the gate opening onto the front terrace (currently the bar area), and raise the height of the existing front wall to 0.9 metres (reinstating the railings on top). This is also included as a recommendation within the submitted Flood Risk Assessment. Whilst there is no objection in principle to sensitively infilling this gate opening with a wall and railings to match the existing, even a slight increase in the height of the existing rendered wall would be out of keeping with the distinctively low front walls (some with railings, some without) of other properties along this and other nearby terraces fronting Marine Parade.

As amended, the latest drawing proposes to retain the gate opening and wall height as existing. The Environment Agency has confirmed that a taller wall is not a flood risk requirement since there are no bedrooms on the lower ground floor. The EA suggests a flood gate instead, but this is considered unwarranted (since there are no bedrooms on the lower ground floor). A solid gate here would appear 'heavy' and insensitive to the surrounding historic context typically characterised by 'lightweight' railing gates, or ungated openings.

The existing garage is a later addition to the building and there is no objection to removing and infilling the existing modern garage door to facilitate use as a cycle and bin store.

The existing rather unsightly metal external staircase fixed to the east side of the rear outrigger (adjoining the alleyway) will be retained as a fire escape in connection with the proposed HMO. Any CCTV would be discreetly sized and located, which can be controlled by planning condition.

However, a minor enhancement to the visual amenity and character of the area will derive from the removal of the existing guest house lettering fixed vertically onto the front elevation, and other signage fixed to the front wall and railings.

There would be no materially harmful impacts to the visual amenity of the area, or to the important historic and architectural character of this Local Interest Building and the surrounding Conservation Area as a result of the proposed development, as such it is considered to meet the heritage requirements of the NPPF and heritage and design Policies DM5 & 24.

Residential Amenity for Future Occupiers

The supporting text to Policy DM1 states as Paragraph 5.22 that to ensure the quality of any new accommodation is high and that it 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.

All 13 rooms have a floor area in excess of 7.5sqm and 9 rooms have a floor area in excess of 11.5sqm (including en-suites). The smallest room is Room 10 which has a floor area of 10sqm (or 7.68sqm omitting the ensuite facilities).

The entire lower ground floor will consist of communal space comprising a kitchen (18sqm), a living/dining area (71sqm) and 2no WC, plus a communal living room/kitchen (27.7sqm) on the second-floor.

Facilities will include 3no 10kg washing machines and 3no tumble dryers. Each single room will be allocated one set day per week for laundry with double occupancy rooms having two allocated days per week.

Cleaners responsible for cleaning floors, surfaces and hygiene would visit on a weekly or fortnightly basis otherwise tenants are expected to clean up after themselves.

It should be pointed out that aside from any grant of planning permission the proposed HMO will be licensable (under the provisions of the Housing Act 2004 and The Management of Houses in Multiple Occupation (England) Regulations 2006) and will need to meet the relevant minimum floor space requirements for sleeping areas set out in that legislation as well as other requirements relating to the adequate provision of communal facilities (including cooking, food preparation and storage, washing and toilet facilities, waste storage and disposal, and fire safety measures). For information, the above legislation sets the minimum floor area of any room in a HMO used as sleeping accommodation for one person at 6.51sqm, and 10.22sqm for two people.

The only issue highlighted by the Private Sector Housing Officer relates to waste storage provision. It has since been demonstrated to the satisfaction of the Council's Waste Operation team, that adequate waste storage and disposal provision can be made within the existing garage, which is to be converted into a bin and cycle store.

Consequently, it is considered a satisfactory standard of living accommodation would be provided for future occupants, with adequate sized bedrooms which meet minimum NDSS, good sized internal communal spaces on 2 different floors, plus a small external amenity area on the forecourt.

Effects on Neighbour Amenity – including Antisocial Behaviour

Policy DM5 requires all new development to make a positive contribution to creating a safe and secure environment by integrating measures for security and designing out opportunities for crime and to not have an unacceptable impact on the amenities of adjacent properties, including an unacceptable increase in noise.

The concerns raised by third parties primarily relate to the nature of the proposed use, the intended future occupiers and potential impacts in terms of increased noise, disturbance and anti-social behaviour/fear of crime.

The amended proposal is for a ‘large HMO’ (i.e more than an HMO of six residents) with 13 bedrooms having a maximum occupancy of 16 people.

The former guest house operated with 11 letting rooms (7 doubles, 4 singles) plus the manager’s own live-in 2-bedroom accommodation. It can reasonably be expected that in peak season occupancy levels at the guest house would have exceeded 16 people.

Both residents and non-residents were able to make use of the bar facilities on the lower ground floor, which included outdoor seating. The latter fronts the busy seafront road where there is generally a higher level of traffic and activity, including the promenade opposite, than nearby residential roads. Bars/drinking establishments are not uncommon along this stretch between the town centre and Heene Road.

It is recognised that an HMO would be occupied in a different way than the former guest house. In providing a place where people would live and have different needs and daily routines to people that are on holiday, it can reasonably be expected the proposed HMO use would generate different levels of comings and goings, including deliveries and visitors at different times of day and evening compared to the former guest house. Even so, it can reasonably be argued that the intensity of activity and comings and goings associated with a maximum of 16 occupants would be unlikely to be significantly different to that generated by the number of small flat units contained within neighbouring buildings.

Moreover, within the context of this busy seafront environment, the level of activity in and around the site, including the use of the external amenity area on the forecourt, would not represent an unacceptably harmful increase in noise and disturbance that would be detrimental to the living conditions of neighbouring or nearby residential occupiers.

The Applicant has confirmed that the external staircase would only be used as a fire escape route and not as an amenity or smoking area. This could be controlled by imposing a planning condition.

In response to the concerns raised by third parties about anti-social behaviour, the Applicant has provided a profile of future occupiers as typically single adults on limited incomes who cannot afford a studio or one-bedroom flat in the private market, often keyworkers employed in local health, care, retail, and hospitality sectors.

In fact, the profile of future occupiers is presently unknown. The HMO, if granted, could be operated privately by the Applicant, as has been their experience to date elsewhere in the Borough. Or, it could be taken on by the Council to provide emergency housing, in which case the Council would have its own management providers and arrangements. In either case, occupancy would be limited to a maximum of 16 persons although if used for emergency housing purposes the Council’s own policy would be to have only single occupancy rooms (with a maximum of 13 residents).

Third parties have identified incidents of anti-social behaviour in the local area for which there is sympathy, albeit there is no compelling evidence directly linking HMO

accommodation with anti-social behaviour. The comments of Sussex Police refer to an 'overconcentration' of HMOs, but as outlined above, it is typically the type and age of the housing stock within the town centre, and the areas around the town centre, that lends itself to this and other forms of higher density housing. The key, as also referenced by Sussex Police, is to ensure that robust management is in place that is tailored to meet the needs of residents and the local community.

If used as emergency housing, the Council has its own established management providers that would be expected to operate a daily (but not 24-hour or overnight) on-site management model, as currently operates at other similar housing provisions elsewhere in the town.

If used as a privately-run HMO, the Applicant has confirmed over a decade of experience managing HMOs including properties with vulnerable or mixed-profile occupants. Leone Properties has previously operated three HMOs within the Worthing area. Planning records identify these as comprising 37 South Farm Road, 47 Broadwater Road and 41 Warwick Gardens.

Although none are as large as is proposed here, the Applicant states that: "*All three properties were fully refurbished to a high standard before occupation and were managed under the company's established inspection, maintenance and tenant liaison procedures. These HMOs accommodated working professionals employed in and around Worthing and Adur, and ran successfully with no significant management or enforcement issues. The company's experience with these properties has provided the directors with a strong and practical foundation in managing medium-scale HMOs, resident expectations, conflict prevention and day-to-today operational oversight."*

A draft Management Plan has been provided which includes the following extracts:-

- Weekly inspections for the first 3 months of operation, and then
- Fortnightly inspections (or more frequently if required by the Council). All inspections and actions to be logged and made available to the Council on request.

All tenants undergo a referencing process including ID verification, proof of income/employment and landlord references. Each tenant will sign an occupancy Agreement including behavioural expectations and house rules.

The applicant would operate a zero-tolerance policy to anti-social behaviour, substance misuse or criminal activity. Breaches are to be managed through formal warnings and if necessary eviction.

New tenancies will normally begin with an initial fixed term of three or six months. This allows both the tenant and the management team to confirm that the arrangement is suitable, that rent payments are maintained, and that all property rules are followed. Subject to satisfactory conduct and compliance, tenancies may then be renewed or converted to a longer-term agreement.

Managing Breaches of Agreement

Where issues arise—such as rent arrears, noise nuisance, anti-social behaviour, or damage to property—the following graduated approach will apply:

Stage 1 – Informal Warning: The issue is discussed with the tenant and confirmed in writing. Support or advice may be offered to prevent recurrence.
Stage 2 – Formal Written Warning: If the behaviour persists or is serious, a formal warning is issued and recorded.
Stage 3 – Legal Notice: If there is no improvement, or in cases of serious or criminal behaviour, the landlord will serve the appropriate legal notice under the Housing Act 1988 (e.g. Section 8 or *Section 21, as applicable) or under any successor legislation.

All eviction or possession procedures will strictly comply with statutory notice periods, court processes, and the Protection from Eviction Act 1977. [**Officer Note*: Renters Rights Act 2025 is abolishing s21 ('no fault') evictions from 1 May 2025 so there would have to be specific grounds to evict]

Security Oversight and Incident Response
In addition to CCTV and coded entry systems, management staff will remain on call at all times for emergencies or incidents. All areas of the property will be covered by high-quality full-wired Swann CCTV with cloud storage and night vision and motion detection. This provides an immediate record of any incident and can be accessed remotely by management if needed.

An emergency contact number is available 24/7 for tenants and neighbours to report urgent issues (e.g. maintenance, noise, or security concerns), with management responding directly or arranging appropriate attendance. Any incidents will be logged and reviewed regularly to ensure swift resolution and ongoing improvement.

Access to CCTV recordings will be restricted to management only.

The property will include:
• Secure coded entry systems
• Lockable bedroom doors
• Compliant fire alarm and emergency lighting
• External lighting to ensure safe access and deter anti-social behaviour

Smoking Policy
Smoking will only be permitted in the designated front patio area, which will include a wall-mounted cigarette disposal bin, CCTV coverage for safety and compliance monitoring and clear signage reminding residents of no-smoking rules elsewhere on the premises. The weekly cleaners will be responsible for emptying the cigarette bins

Neighbour Liaison and Community Engagement
A management email address and 24/7 emergency contact number will be shared with neighbouring properties and the Council. Any concerns will be promptly addressed. Tenants will be reminded that they are part of a residential community and are expected to behave respectfully at all times.

Emergency Maintenance and Call Handling
A 24/7 emergency contact number will be available for all residents and neighbours. Urgent maintenance issues such as leaks, heating failures, or security concerns will be handled promptly by the management team or on-call trades. All incidents will be logged and monitored as part of the property's management oversight.

Records will be maintained of tenant vetting, inspections, complaints, incidents, maintenance, and communication with the Council or other agencies, ensuring an accountable and auditable management process.

The Applicant states that the draft Management Plan demonstrates a proactive and professional approach to the management of the property through robust operational procedures, frequent oversight, and open communication with tenants, neighbours, and the Council.

The Draft Management Plan demonstrates a commitment to robust management practices and procedures. A pre occupation condition is recommended requiring a finalised Management Plan to be submitted and approved in writing by the Local Planning Authority that is tailored to reflect the specific needs of the future tenants including any special requirements, such as, the provision of regular/daily on-site management and signposting to other local support services/agencies.

Accessibility and parking

The site is in a highly sustainable location within walking distance of the shops and facilities of the town centre and accessible to several different bus routes serving Worthing and destinations further afield. Worthing rail station is 1 mile to the North.

No on-site parking provision is available. The garage attached to the rear of the building has an 'up and over' door fronting the adjacent twitten/alleyway with vehicle access provided from the latter onto Marine Parade. Nevertheless, it is doubtful the garage is realistically capable of use for garaging owing to the narrow width of the twitten/alleyway and tight right-angle turn into the garage.

There are double yellow lines directly in front of the application property extending eastwards to in front of Claydon Court. There is a parking bay (large enough for about 4 vehicles) within the Controlled Parking Zone to the west in front of Nos.112-116. There are pay & display parking bays on the south side of Marine Parade directly opposite.

The Local Highway Authority (LHA) has not raised any objection on highway safety grounds to the lack of parking provision noting that the proposal would result in a reduction in car parking demand compared to the current guest house use. The LHA has suggested the Local Planning Authority may wish to consider the potential impacts of on-street parking from an amenity point of view. The limited availability and capacity of on-street parking in the immediate vicinity of the site, and the inconvenience and frustration it can cause to local residents who have difficulty parking their vehicles is well expressed in the third party comments received. However, it follows that a reduction in car parking demand generated by the

proposed HMO use compared to the current lawful guest house use, would have lesser impacts on amenity than at present.

The secure covered cycle storage shown within the existing garage building can be secured by a planning condition.

Flood risk

The site is located within EA Tidal Flood Zone 3 and at medium/high risk of surface water flooding taking into consideration the effects of climate change. As a residential use, the proposed HMO is defined as 'More Vulnerable' in national flood risk guidance, this is the same level of flood vulnerability as the existing guest house. Paragraph 176 of the NPPF confirms that applications for changes of use are not subject to perform the flood-risk sequential test but a Flood Risk Assessment is required due to its location in Flood Zone 3.

Accordingly the application is supported by a site-specific Flood Risk Assessment. This outlines that there will be no proposed sleeping accommodation on the lower ground floor. The upper ground-floor level is above the height of the defended 1 in 200 year (plus climate change) tidal flood event and is therefore not affected.

The EA has raised no objection to the proposal on the basis that there will be no sleeping accommodation on the lower ground floor and this can be secured as a condition of planning permission in the event of approval.

The Council's drainage consultant, WSP, initially objected to the proposals. However, further information has been received to demonstrate that future occupiers are able to exit the building and safely make their way to a place of permanent refuge during the 100-year surface water flood event. As well as external escape stairs, internal stairs from the lower ground floor can safely bring users to the upper ground floor level set at 6.41m which is above the 100-year surface water flood event. WSP has withdrawn their objection on this basis.

Conclusion

The proposal involves the loss of a seafront guest house, but satisfactory evidence has been provided to demonstrate such use is no longer viable in accordance with Local Plan policy requirements.

There is a clear need for all types of housing in the Borough and the proposal brings forward a type of affordable residential accommodation for which there is a recognised need. The proposal will provide an acceptable standard of living accommodation for future residents. This is balanced against the considerable concern that has been raised by local residents to the size and use of the building and potential for increased noise, disturbance and anti-social behaviour. Initial concerns about the intensity of use resulting from the proposed number of residents accommodated at the property have been addressed by a reduction in the maximum number of occupants to 16.

Notwithstanding the concerns raised, there is no evidence that this form of shared accommodation causes anti-social behaviour and is largely dependent on the

effectiveness of the management practices and procedures in place. In addition to the separate licensing requirements for HMO (under the Housing Act 2004 and The Management of Houses in Multiple Occupation Regulations 2006) it is considered the potentially harmful impacts of the proposed HMO use on amenities of nearby residential occupiers can be satisfactorily mitigated by imposing suitable planning conditions, including a pre occupation condition requiring the submission and approval in writing by the Local Planning Authority of a final Management Plan tailored to the reflect the specific housing needs and safety of future residents and the local community.

Recommendation

APPROVE, Subject to Conditions:-

1. Approved Plans

2. Standard 3yr Time Limit

3. Prior to commencement of use a final Management Plan tailored to meet the specific housing needs and safety of future residents and the local community shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the HMO shall only be operated in accordance with the agreed Management Plan and the specific management measures contained therein.

4. Maximum number of occupants limited to no more than 16.

5. The existing external stairs on the east side of the building shall only be used as a fire escape route and shall not be used as an amenity or smoking area at any time.

6. i) The use hereby approved shall be carried out in accordance with the submitted Flood Risk Assessment (ref: AEG0160_BN11_Worthing_01) and the following mitigation measures it details:
   • Upper ground-floor finished levels set no lower than 6.41m AOD;
   • Sleeping accommodation on the upper ground floor and above only.
   ii) A Flood Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The provisions of this Flood Evacuation Plan shall be implemented prior to the commencement of the use hereby approved and shall be maintained and kept up-to-date for the duration of the approved use.

7. Prior to commencement of works to implement the proposed use details of the design and materials of the proposed infilling to existing garage door opening shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented as agreed.

8. Pre occupation - Agree cycle store provision

9. Pre occupation - Agree bin storage provision

10. Pre occupation - details of any CCTV, including its appearance