

TOWN & COUNTRY PLANNING ACT 1990

MARINE VIEW, 111 MARINE PARADE, WORTHING, BN11 3QG

**CHANGE OF USE FROM GUEST HOUSE (CLASS C1) TO LARGE HOUSE
IN MULTIPLE OCCUPATION (SUI GENERIS)**



PLANNING, DESIGN & HERITAGE STATEMENT V.2

15 August 2025

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1. INTRODUCTION

- 1.1 This statement is submitted in support of a planning application for change of use from a guest house (Class C1) to a large house in multiple occupation (HMO) with 14 bedrooms (sui generis). The accommodation will house a maximum of 23 people, in 9 double rooms and 4 single rooms.
- 1.2 Worthing Borough Council has previously agreed the loss of the guest house in principle when it granted planning permission for change of use from a guest house to self-contained flats in 2022 (AWDM/1726/21).
- 1.3 Prior to purchasing Marine View Guest House, the applicant discussed the change of use to an HMO with the Council's Housing Officers.
- 1.4 This application is accompanied by the following documents and plans by Landivar Architects:

- Application Form
- Planning, Design & Access Statement by DJM Town Planning, February 2025

Plans by Landivar Architects:

- 1751. 1.000 Rev B Existing Block Plan, Existing Elevations and Floor Plans
- 1751.2.000 Rev B Proposed Block Plan, Proposed Elevations and Floor Plans

2. THE APPLICATION SITE

- 2.1 Marine View is a three storey with basement, end of terrace building on the seafront promenade. It has been in use as a guest house since 1977. The building frontage displays many features of Victorian architecture, including stucco-covered walls, decorative mouldings, string courses and bracketed eaves.
- 2.2 At the rear the building has a three storey plus basement outrigger. A twitten runs down the side of the property, giving access to residential dwellings behind Marine Parade. There is a garage with roller shutter door on the premises, off the twitten.
- 2.3 The guest house has a bar, dining room and kitchen at basement level and guest rooms on the ground and first floors. The top floor was occupied as a separate flat by the owners, who ran the guest house.
- 2.4 The basement bar has its own access onto the street, and it is understood that the bar was open to non-residents. All guest rooms have en-suites. The room sizes are as follows:
- | | | |
|-------------------------|--------------------------|--------------------------|
| B1: 21.0m ² | B6: 7.7 m ² | B11: 13.0 m ² |
| | B7: 13.1 m ² | B12: 8.3 m ² |
| B2: 14.1m ² | B8: 10.2 m ² | B13: 14.9 m ² |
| B3: 9.2 m ² | B9: 11.9 m ² | |
| B4: 11.9 m ² | B110: 7.5 m ² | |
| B5: 22.7 m ² | | |
- 2.5 All the rooms are in very good condition.
- 2.6 The building is located in the Marine Parade and Hinterland Conservation Area. The Council has identified the building as one of 'local interest'.

3. PROPOSED DEVELOPMENT

- 3.1 The application proposes change of use from a guest house (Use Class C1) to a large HMO (sui generis). The HMO will have nine double and four single rooms on the ground, first and second floors, a kitchen and dining room occupying the entire basement level, and a 27.2sqm further kitchen / dining room on the second floor.
- 3.2 The garage in the rear yard will be used for refuse bin and bicycle storage.
- 3.3 The HMO will have a maximum occupancy of 23 people.
- 3.4 No external alterations are proposed to the building. The internal layout will be also retained as it is currently, with fourteen bedrooms, each with its own en-suite shower room.
- 3.5 The HMO Officer has already made a full inspection of the property and was very impressed with the quality of the rooms, and that fact that they are all en-suite and it has a central town location.

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Change of Use from Guest House (C1) to large HMO (sui generis)



Figure 1: Bedroom 1, on the ground floor



Figure 2: Rear first floor bedroom



Figure 3: Bar in the basement level



Figure 4: Side and rear elevations

4. PLANNING POLICY CONTEXT

4.1 The policy context comprises the Worthing Local Plan 2020 – 2036 and the 2024 National Planning Policy Framework (NPPF). Other material considerations include Worthing Borough Council's 'Compliance Guide for Houses in Multiple Occupation' (2023) and the 'Hotel and Visitor Accommodation Futures Study' (2013).

4.2 The Council's most recent published housing land supply position demonstrates a supply of 6.3 years ¹.

4.3 Relevant Worthing Local Plan (LP) policies:

SP1 Presumption in Favour of Sustainable Development

DM1 Housing Mix

DM2 Density

DM5 Quality of the Built Environment

DM12 The Visitor Economy

DM20 Flood Risk and Sustainable Drainage

DM23 Strategic Approach to the Historic Environment

DM24 The Historic Environment

4.4 National Planning Policy Framework

4.5 Paragraph 11 puts the presumption in favour of sustainable development at the heart of planning decision making. This means approving development proposals that accord with an up-to-date development plan without delay.

4.6 Chapter 5 seeks to deliver on the Government's ambitious plans for new homes. Paragraph 61 states that it is important that a sufficient amount and variety of land comes forward where it is needed for housing, that the needs of groups with specific housing requirements are addressed. When establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups include, *inter alia*, those who require affordable housing including Social Rent (NPPF, 63).

¹ Worthing Five Year Housing Land Supply Position Statement as of 1st April 2024

- 4.7 Planning decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (NPPF, 125).
- 4.8 Paragraph 86 calls on local planning authorities to be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.

5. CONSIDERATION OF PLANNING POLICIES

5.1 Principle of the Change of Use

5.1.1 The loss of the guest house was assessed at length as part of the previous application for change of use to four self-contained flats (AWDM/1726/21). In concluding that the loss was acceptable, Officers took into consideration the financial difficulties facing the business since 2016 when the last owners bought the property, and the changing trends in leisure accommodation including the widespread adoption of Air BnB. Coupled with the opening up of Premier Inn and Travelodge in Worthing, which cater for changing tastes and can offer lower costs compared to traditional, independent guest houses, these trends have undercut established, serviced, visitor accommodation sector in the town.

5.1.2 Citing paragraph 86 of the Framework (formerly para. 82), and considering the “significant housing needs of the Borough”, Officers accepted the loss of the guest house. They added, “the proposed residential use of the property would make a welcome addition to the local housing stock in a highly sustainable location”.

5.1.3 The principle of the change of use is therefore considered acceptable.

5.2 Provision of a House in Multiple Occupation

5.2.1 Latest published interim figures ² indicate that the Council can currently demonstrate a five year supply of housing land (5YHLS) . These figures were published prior to the December 2024 NPPF, and its revised formula for calculating housing need. Moreover, ability to demonstrate a 5YHLS does not preclude support for additional land and buildings for housing, especially where that housing meets an identified need (NPPF, 63 and 125).

5.2.2 Policy DM1 of the LP provides for flexible, socially inclusive and adaptable housing to help meet the diverse needs of the community, and changing needs of occupants over time. The supporting text to DM1 notes that shared accommodation and well-designed HMOs play an important role in providing housing for people on low incomes, those on benefits

² 1st April 2024

payments and young professionals. They are “often the only choice of housing for people who would otherwise be homeless” (LP, para. 5.5).

5.2.3 The applicant has discussed the proposal for an HMO with James Elliott, Senior Environment Health Officer (Private Housing Section), and Steven Hay, Acquisitions and Landlord Support Coordinator for Worthing Borough Council. Both Mr Elliott and Mr Hay confirm that there is a urgent need in the borough for emergency and social housing, and temporary accommodation.

5.2.4 The application site would, therefore, provide for an identified housing need in a sustainable location. Day to day services and public transport are readily available within walking distance of the site, and residents are unlikely to own cars. Bus services run along Marine Parade, the nearest stop being opposite Queens Road just outside the property.

5.2.5 NPPF paragraph 125 promotes the most efficient use of underutilised land and buildings. With the demand for traditional, serviced hotel accommodation in the town waning, the building no longer meets a clearly defined need. Converting the building to an HMO brings the building back into an effective use, meeting an identified need for housing in accordance with paragraph 125.

5.3 Amenity of Future Occupants

5.3.1 Policy DM2 expects all new dwellings across all tenures (including HMOs) to meet the standards in the Nationally Described Space Standards (NDSS). Worthing Borough Council’s ‘Compliance Guide for Houses in Multiple Occupation’ also sets out minimum sizes for HMO rooms, which are slightly lower than those in the NDSS.

5.3.2 The NDSS recommends 7.5m² minimum for a single occupancy bedroom, and 11.5m² for a double. The Council HMO Guide stipulates the legal minimum of 6.51m² for a single and 10.22m² for a double.

5.3.3 The property contains eight double rooms in excess of 11.5m², and four single rooms in excess of 7.5m². Bedroom 8 is 10.2m², making it a double bedroom in relation to the statutory minima in the HMO Guide, and a single in the NDSS.

- 5.3.4 The HMO will have a maximum occupancy of 23 people, based the Worthing HMO Standards room sizes.
- 5.3.5 All rooms have en-suite shower rooms with WCs. There are two additional WCs on the basement level. The two communal spaces, the basement dining room and kitchen and the second floor kitchen / dining room, meet the requirement in the HMO Guide for a dedicated space for occupants to sit down, socialise and consume meals.
- 5.3.6 The basement communal dining and recreational area extends to 73sqm. This is very generous for an HMO communal space. The Worthing HMO guidance advises that communal space "should be proportionate in size to the number of occupiers sharing the dwelling". A further 27m² kitchen / dining room will be provided on the second floor, so that all residents are within one floor of a kitchen, in accordance with the HMO Standards,
- 5.3.7 The lock up garage in the rear yard can be adapted to provide secure cycle storage in accordance with West Sussex standards, in accordance with DM15. There is space for refuse and recycling bins in the rear yard, accessed from the basement level.
- 5.3.8 The proposed HMO is considered acceptable and of an adequate standard to provide comfortable living accommodation for future residents.

5.4 Flood Risk

- 5.4.1 The site is in Flood Zone 3a (FZ3a). The proposed HMO use is defined as 'More Vulnerable' in Annex 3 of the NPPF, as is the existing guest house.
- 5.4.2 The property is protected by tidal flood defences and this therefore reduces the risk of tidal flooding to very low. Risk of flooding was assessed under the previous application, which was acceptable subject to no sleeping accommodation in the basement level. Similarly, this application has no sleeping accommodation in the basement.
- 5.4.3 The applicant's Drainage Engineer, Simon Dent of SDA, has obtained the latest flood data from the EA and compared it against the data used by Aegaea for the previous application for change of use to residential dwellings. Mr Dent has prepared a letter, dated 18th July 2025, to accompany the FRA by Aegaea. The letter confirms that SDA

endorse the use of the Aegaea FRA for this application, as none of the circumstances have changed, including no sleeping accommodation on the lower ground floor.

- 5.4.4 The findings of the 2022 FRA are equally relevant to this application so it is submitted to support the change of use to HMO.

5.5 Amenity of Nearby Residents

- 5.5.1 The immediate uses around the site are residential. The attached mid-terraced property to the west (no. 112) is in use as 8 no. flats. To the east, beyond the twitten is 110 Marine Parade, a two-storey dwelling. It has a walled garden at the rear, and garage accessed off the twitten. To the rear are further residential dwellings, 2 Queens Road and 1 Brunswick Cottages, accessed via the twitten.
- 5.5.2 Policy DM5 requires development to not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise giving rise in significant adverse impacts, or vehicular movements.
- 5.5.3 An HMO is also a residential use. The HMO's proposed maximum occupancy is comparable to the level of occupancy of a hotel use, when full with no vacancies. For many years the hotel would have operated with high occupancy levels, particularly in peak season, and of course it could do so now under its established use as a C1 guest house.
- 5.5.4 111 Marine Drive is located on the seafront half a mile west of Worthing pier. The locality has a close urban grain and relatively high density of buildings and uses. Many of the larger terraced properties are sub-divided into flats, and are interspersed with hotels and holiday apartments. The introduction of an HMO in this location will widen the choice of housing available, and would be an appropriate use in this mixed residential and commercial area.
- 5.5.5 The HMO use will not result in unacceptable impacts on the amenity enjoyed by the occupants of nearby residential properties, as per DM5.

6. HERITAGE STATEMENT

- 6.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 is the key piece of legislation in England and Wales that protects the historic environment. It provides the legal framework for the protection of listed buildings and conservation areas. Section 72 of the Act requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 6.2 NPPF paragraph 212 advises 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 (and the more important the asset, the greater the weight should be).
- 6.3 The NPPF policies are reiterated in DM23 and DM24 of the LP, which conserve and enhance the town's historic environment, ensuring development does not adversely affect heritage assets or their setting.
- 6.4 The site is situated in the Marine Parade and Hinterland Conservation Area. No external alterations are proposed to the building, so there will be no physical change to the character and appearance of the Conservation Area.
- 6.5 The introduction of new uses into a conservation area can affect their character, however in this instance the use of the building for residential purposes is considered appropriate and not harmful to the heritage asset. These buildings would have originally been built as residences, and most of the seafront properties are retained in residential use to this today, albeit many sub-divided into flats.
- 6.6 There would be no harm to the significance of the Marine Parade and Hinterland Conservation Area as a result of this development.

7. CONCLUSIONS

- 7.1 It is proposed to change the use of 111 Marine Parade from a guest house to a large house in multiple occupation (HMO). The guest house has been struggling financially for many years. In 2022, the Council accepted the loss of the guest house, contrary to Plan policies that aim to protect visitor accommodation, when it granted planning permission for change of use to 4no. self-contained flats (AWDM/1726/21).
- 7.2 With the principle of change of use to residential accommodation established, the current application proposes a large HMO that could house a maximum of 23 residents. Worthing Borough Council Housing Officers have confirmed that there is an urgent need for emergency and temporary accommodation in the town.
- 7.3 The change of use does not require any external physical works to the building. The premises can be converted to an HMO with minimal alterations.
- 7.4 The basement level would be retained as a communal eating and socialising area, with no sleeping accommodation, to meet the requirements of the Council's Flood Risk Officer.
- 7.5 The building would provide a good standard of accommodation for 23 residents, in both double and single rooms, with a large communal kitchen and dining room on the basement floor, and further kitchen / dining room on the second floor. The accommodation would comply with the Worthing and Adur Compliance Guide on HMOs.
- 7.6 The application site is less than half a mile from the town centre, which is easily accessible on foot or public transport. Bus services run regularly along Marine Parade. The site is sustainably located.
- 7.7 The local area is predominantly residential, interspersed with hotels and holiday apartments. The use of the building for residential purposes would be appropriate in this mixed use area of the town.
- 7.8 In light of the above, it is respectfully requested that planning permission is approved.