

Design, Access and Planning Statement

Change of Use from Dwellinghouse (Use Class C3) to Large House in Multiple Occupation (Sui Generis)



Site Location:	56 Rowlands Road, Worthing, BN11 3JT
Date:	4/02/2026
Planning Authority:	Adur & Worthing Councils

1. Introduction

Homz has been told to submit a full planning application to Adur & Worthing Councils for a change of use from a Class C3 dwelling house to a sui generis House in Multiple Occupation at 56 Rowlands Road, Worthing, BN11 3JT.

The application site is located within the administrative area of Worthing Borough Council, operating jointly with Adur District Council as Adur & Worthing Councils.

The proposal does not involve any external alterations, extensions, or increases in built form. The scheme relates solely to the lawful use of the building, and therefore must be assessed on the basis of principle, intensity, amenity impact, and policy compliance, rather than physical development.

2. Site Description and Surrounding Context

The application site comprises a substantial semi-detached period residential building located on the eastern side of Rowlands Road, within the Heene area of Worthing. The property sits within an established urban residential environment characterised by large dwellings, many of which historically and presently accommodate non-traditional residential uses, including former care homes, guest houses, and shared accommodation.

The site benefits from:

- A generous plot size of approximately 402 sqm
- A large internal floor area distributed across two storeys
- Existing off-street parking provision within the curtilage
- An enclosed rear garden providing private amenity space
- Proximity to Worthing town centre, the seafront, the railway station, bus routes, and a full range of local services

The site lies outside the defined town centre, but in a location that is highly sustainable, accessible, and entirely appropriate for denser forms of residential occupation in policy terms.

3. Planning History and Lawful Use (Critical Consideration)

The planning history of the site is clear, well-documented, and legally robust, and is a central material consideration in the determination of this application.

3.1 04/01331/CLE (2004) – Granted

Certificate of Lawful Development for Use as a Children’s Home

This certificate confirms that the property was lawfully used as a children’s home, a use falling within Class C2 (Residential Institution). This establishes that the building has historically accommodated multiple unrelated occupants under managed arrangements, with an intensity materially greater than that of a typical single household dwelling.

3.2 AWDM/0355/14 (2014) – Granted

Change of Use from Class C2 to Class C3 (Dwellinghouse)

This was a full planning permission granting the change of use from a residential institution back to a dwellinghouse. In granting this permission, the Local Planning Authority accepted:

- The principle of residential use at this scale
- The suitability of the building for continued residential occupation
- That the building did not need to remain in institutional use, but could function flexibly as residential accommodation

3.3 AWDM/1611/14 (2014) – Granted

Lawful Development Certificate for Existing Use as Class C3 Dwellinghouse

This Certificate of Lawful Development is conclusive in law under section 191 of the Town and Country Planning Act 1990. It definitively establishes the lawful planning use of the property as Class C3.

There is therefore no ambiguity regarding the lawful baseline use of the site.

3.4 Material Implications of the Planning History

The planning history demonstrates:

- Long-standing acceptance of managed, multi-occupancy residential use
- A lawful fallback position of Class C3
- A clear absence of any enforcement concerns or historic amenity harm

The proposed HMO use does not introduce an alien or unprecedented form of occupation. Instead, it represents a controlled and policy-compliant evolution of an established residential use within a building that has historically supported more intensive forms of occupation.

4. Description of the Proposed Development

4.1 Overview of the Proposal

The application seeks full planning permission for the change of use of the property at 56 Rowlands Road, Worthing, from a lawful Class C3 dwellinghouse to a sui generis House in Multiple Occupation (HMO) accommodating up to eight adults, each occupying a single bedroom.

The proposal does not involve any external works, extensions, alterations to the building envelope, or changes to the site's physical form. The development is therefore entirely use-based, and the planning assessment must focus on the nature, scale, intensity, and management of the proposed occupation, rather than design or built impact.

4.2 Relationship to the Site's Planning History and Lawful Use

The proposed development must be understood in the context of the site's long and established planning history, which demonstrates that the building has repeatedly and lawfully accommodated multiple unrelated occupants under managed arrangements.

Historically, the property has operated as:

- A children's home (Class C2), confirmed by a Certificate of Lawful Development granted in 2004
- A dwellinghouse (Class C3) following a full planning permission granted in 2014

- A lawful Class C3 use confirmed by a subsequent Lawful Development Certificate in 2014

The lawful planning use of the site is therefore unambiguously Class C3, as conclusively established by the 2014 Lawful Development Certificate. That certificate represents definitive legal confirmation of the authorised use and forms the correct baseline against which the current proposal must be assessed.

While the lawful use is C3, the planning history is a material consideration in demonstrating that the building has long been capable of supporting shared and managed residential occupation, including uses that were materially more intensive than the proposed eight-person HMO.

It is also material that the property was professionally managed by YMCA DLG for a period exceeding ten years, accommodating approximately six to seven unrelated adult residents with on-site support arrangements. This level of occupation is comparable to the population proposed under this application and occurred without recorded planning or amenity concerns, demonstrating the building's long-standing capacity to accommodate managed shared residential use.

The proposal does not seek to rely on immunity, fallback arguments, or retrospective justification. Instead, it represents a forward-looking, policy-led application to formalise a managed shared living arrangement through the appropriate planning process.

4.3 Proposed Occupancy Level and Intensity of Use

The proposed HMO would accommodate no more than eight residents, each occupying a single bedroom. This occupancy cap is a deliberate and fundamental component of the proposal.

Key points include:

- No double-occupancy rooms are proposed or sought
- No flexibility is requested to exceed the eight-person cap
- The proposal is intentionally not a maximum-yield scheme

Although the size and configuration of the building could physically accommodate a greater number of occupants, the applicant has consciously elected to pursue a moderate, controlled level of occupation. This approach reflects a clear intention to balance housing delivery with residential amenity protection, operational manageability, and planning policy compliance.

The proposed intensity is therefore proportionate to the scale of the building, the size of the plot, and the established residential character of the surrounding area.

4.4 Internal Layout and Quality of Accommodation

The proposed internal arrangement provides a high standard of accommodation, with sufficient space for both private living and communal interaction.

The layout includes:

- Eight single bedrooms arranged across the ground and first floors. The bedrooms themselves are generous in scale, with an average floor area comfortably exceeding minimum HMO licensing standards. Several rooms are capable of accommodating double occupancy from a spatial perspective; however, the proposal deliberately restricts occupation to single residents per room to ensure a moderated and policy-compliant level of residential intensity.
- Multiple shared bathrooms and WCs to avoid pressure on facilities. The property provides two communal bathrooms, four communal WCs, and an additional ensuite bathroom/WC serving one bedroom. This level of provision exceeds typical HMO standards for shared sanitary facilities and ensures adequate capacity for residents without placing pressure on communal amenities.
- Two kitchen areas to support day-to-day living and reduce congestion
- Dedicated communal living and dining areas
- Ancillary utility and storage space

The provision of generous communal facilities is a critical component of the proposal, ensuring that residents are not confined to bedrooms and that the

dwelling functions as a coherent shared household, rather than an overcrowded lodging arrangement.

This internal configuration reflects the building's historic function as a large residential property and supports a stable and sustainable form of shared occupation.

4.5 Management and Operational Characteristics

The proposed HMO would operate as a managed residential property, rather than an unmanaged or transient form of accommodation.

The operational model includes:

- Single-person rooms only
- Clear management arrangements governing behaviour, noise, and use of shared spaces
- Structured waste storage and refuse presentation
- Regular property maintenance and oversight

The applicant has extensive experience in managing shared residential accommodation and HMOs and is capable of operating the property in a manner that is orderly, well-regulated, and respectful of neighbouring residents.

Where necessary, a HMO Management Plan can be secured by condition to provide additional reassurance regarding the day-to-day operation of the property.

4.6 Embedded Amenity Safeguards

The proposal has been shaped specifically to address common concerns associated with HMOs, including noise, disturbance, antisocial behaviour, and over-intensification.

These issues are mitigated at source through:

- A restricted occupancy level
- Single-occupancy bedrooms

- Adequate internal communal space
- Retention of private outdoor amenity areas
- A managed operational approach

As a result, the proposal does not give rise to an unacceptable impact on neighbouring residential amenity and represents a controlled and balanced form of shared living.

4.7 Parking, Cycle Storage, and Movement

The proposal retains existing off-street parking provision within the curtilage of the site and incorporates dedicated cycle storage facilities.

Given the site's highly sustainable location, close to public transport, services, and employment opportunities, the proposal does not rely on high levels of car ownership and aligns with sustainable transport objectives.

The parking provision is appropriate and proportionate, and the proposal does not seek to over-provide parking in a manner that would conflict with local or national policy aims.

4.8 Clarification of Scope

For the avoidance of doubt, the proposal:

- Does not involve redevelopment or physical expansion
- Does not alter the external appearance of the building
- Does not seek flexible or intensified occupancy
- Does not rely on lawful use arguments beyond the established C3 baseline

It is a straightforward application for a controlled change of use, assessed against the development plan and other material considerations.

4.9 Summary of the Proposed Development

In summary, the proposed development comprises:

- A change of use from Class C3 to a sui generis HMO
- Accommodation for up to eight adults in single bedrooms

- A restrained and deliberately moderated level of occupation
- High-quality internal accommodation and communal facilities
- A managed and policy-compliant operational model
- A use that aligns with the site's planning history and surrounding context

Taken as a whole, the proposal represents a carefully considered, proportionate, and sustainable form of development, fully aligned with the objectives of the Worthing Local Plan and the National Planning Policy Framework.

5. Planning Policy Context

The application is assessed against the statutory development plan, comprising the **Worthing Local Plan (2023)**, together with relevant provisions of the **National Planning Policy Framework (NPPF)**.

Key policies include:

- **SP1 – Principle in Favour of Sustainable Development**
- **SS1 – Spatial Strategy**
- **DM1 – Housing Mix**
- **DM2 – Density**
- **DM5 – Quality of the Built Environment**
- **DM15 – Sustainable Transport and Active Travel**
- **DM16 – Sustainable Design**

Importantly, the Worthing Local Plan does not impose numerical caps, thresholds, or concentration limits on HMOs, nor is the site subject to any Article 4 Direction removing permitted development rights in respect of HMO use. The proposal must therefore be assessed on its individual planning merits.

6. Assessment of Key Planning Considerations

6.1 Principle of Development

The principle of providing shared residential accommodation at this site is clearly supported by policy.

Policy DM1 explicitly recognises the role of well-designed HMOs in meeting local housing needs, including accommodation for people on lower incomes, young professionals, and those who might otherwise struggle to access housing.

The proposal delivers precisely this form of accommodation in a sustainable location, without displacing family housing stock that is demonstrably in short supply at this scale and format.

6.2 Density and Intensity of Use

Policy DM2 requires efficient use of land while respecting context and amenity.

The proposal achieves this balance:

- No increase in built form or space
- Eight occupants within a large, generously proportioned dwelling
- Bedroom sizes that meet or exceed statutory and licensing standards
- Adequate communal space to prevent over-intensification

The proposed density is entirely appropriate for the size of the building and its urban context and is materially lower than other large HMOs recently considered within Worthing.

6.3 Residential Amenity

Concerns often raised in relation to HMOs include noise, disturbance, and antisocial behaviour. In this case, such concerns are not substantiated by the site's history or the nature of the proposal.

Key points include:

- Single-occupancy bedrooms only
- No intensification through double rooms
- Long history of managed shared occupation without recorded planning harm
- Opportunity to secure an HMO Management Plan by condition

The proposal would not result in an unacceptable impact on the living conditions of neighbouring occupiers and fully complies with Policy DM5.

6.4 Parking, Transport, and Sustainability

The site is located in a highly sustainable location, close to public transport, services, and employment.

Policy DM15 actively supports development that reduces reliance on private vehicles. HMOs typically demonstrate lower car ownership levels, and the Council has not adopted a specific parking standard for HMOs.

The provision of off-street parking, together with cycle storage, is therefore appropriate, proportionate, and policy-compliant. Over-provision of parking would actively conflict with sustainable transport objectives.

6.5 Design and Character

As confirmed by the submitted drawings, the proposal involves no external alterations. The appearance, scale, and architectural character of the building and the wider street scene remain entirely unchanged.

The proposal therefore preserves the character and appearance of the area in accordance with Policies DM5 and DM16.

7. Technical and Management Considerations

The applicant has extensive experience in managing shared accommodation. The property already benefits from an internal layout capable of meeting HMO standards, including adequate bathrooms, kitchens, and fire safety provisions.

The property has operated in a managed shared residential capacity for over a decade and has been maintained to standards consistent with HMO operational requirements, including fire alarm systems, fire doors, and safety infrastructure. The presence of these measures over a prolonged period without complaint further indicates that the operational characteristics of the proposed HMO use are well established and compatible with the surrounding residential environment.

Matters relating to licensing, fire safety certification, and ongoing management fall within separate statutory regimes and can be secured through standard planning conditions and the HMO licensing process.

8. Planning Balance

The proposal delivers clear and demonstrable planning benefits:

- Provision of much-needed shared accommodation
- Efficient use of an existing large residential building
- Formalisation and regulation of a long-established pattern of occupation
- Sustainable location with excellent access to services
- No visual, physical, or residential amenity harm

There are no adverse impacts that would significantly or demonstrably outweigh these benefits.

9. Conclusion

This proposal represents a sound, policy-compliant, and proportionate form of development.

It does not introduce harm, over-intensification, or inappropriate change. Instead, it provides a controlled and well-managed form of shared accommodation fully aligned with the Worthing Local Plan (2023) and the objectives of the NPPF.

For these reasons, it is respectfully requested that planning permission be granted.

For the above reasons, the development is sustainable development and is also in accordance with national policy and guidance. Therefore, in the absence of any other material considerations to justify otherwise, it is respectfully requested that development be considered as acceptable in principle.

Should the Planning Authority request any further information to process this request for **Change of Use from Dwellinghouse (Use Class C3) to Large House in Multiple Occupation (Sui Generis)**, please contact Shivam at **Homz UK** Shivam@homz.uk directly as the acting agent and we will be more than happy to deliver any additional information as and when required.