

Development Management – Delegated Officer Report

Application Number: AWD/0208/26

Recommendation: – APPROVE

Site: 56 Rowlands Road Worthing West Sussex BN11 3JT

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

Date of Site Visit: 05.03.2026

Neighbours Checked: Y

Additional Neighbours Notified: N

Site and Surroundings

The application relates to an end-of-terrace, 2-storey, Victorian villa with stuccoed elevations and shallow, tiled, pitched roof sited on the north side of Rowlands Road within an edge of centre location. The short terrace made up of 3no dwellings forms a balanced composition incorporating a series of stepped components to the dwellings at either end. Architectural details include chimneys, canted bay windows, decorative cornice treatment, profiled banding and 'rustication' of the stucco at ground floor. Most (if not all) of the original timber sash windows have been replaced with UPVC casements.

The building is set back from the road behind a flint and brick dressed boundary wall and a gravelled frontage area. There is vehicle access to the frontage area used for parking. The gravelled area also wraps around to the west side of the building. A walled garden area lies to the rear (North) with pedestrian access onto Nursery Lane, a tarmacked lane running parallel to Rowlands Road.

The lawful use of the property is a dwelling (Class C3). It is currently vacant.

Adjoining the site to the west is 36 Wordsworth Road, a 2-storey block of 10no flats incorporating roof accommodation with a pitched 'crown' roof. The building is relatively modern, its architectural style a pastiche of a Victorian villa with similar architectural features and detailing to the application property. Adjoining to the East is the attached mid-terraced property (No.58).

Opposite is a three-storey terraced parade consisting of a mix of retail shops, offices, food and drink premises within the town centre secondary shopping frontage, with residential flats on the upper floors above.

Proposal

Permission is sought for a change of use from a dwelling (Class C3) to a large HMO (sui generis) for up to 8 adults.

No external alterations are proposed. The application is accompanied by a Planning Statement and a Draft Management Plan. Key excerpts are: -

- The proposed layout shows 8 single rooms over the ground and first floor. The bedrooms are generous with average floor areas comfortably exceeding minimum HMO licensing standards. Although several rooms are capable of double occupancy the proposal is deliberately for single resident rooms to ensure a moderated and policy compliant level of residential intensity.
- The property provides 2 communal bathrooms, 4 communal WCs and an additional ensuite bathroom/WC serving one bedroom. Multiple shared bathrooms and WCs avoid pressure on facilities.
- Two kitchen area support day-to-day living and reduce congestion.
- Dedicated communal living and dining areas.
- Clear management arrangements governing behaviour, noise and use of shared spaces. 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.

Relevant Planning History:

WB/04/01331/CLE - Application for Certificate of Lawful Development for existing use as a children's home

STATUS: 27th January 2005.

AWDM/0355/14 - Change of use from Use Class C2 (residential institution) to Use Class C3 (dwellinghouse).

STATUS: Application Permitted 23rd May 2014.

AWDM/1611/14 - Application for a Lawful Development Certificate for existing use as Class C3 dwelling house

STATUS: Application Permitted 11th December 2014.

Consultations

WSCC: The Local Highway Authority has raised no objection in principle, commenting:

"Access

The house is located on Rolands Road which offers a mix of residential and retail outlets. There is controlled on-street parking, and all junctions within the vicinity of the site are protected with enforceable parking restrictions such a double yellow line.

Access int the site is taken from Rolands Road, which has a 30mph speed limit and a single yellow line is located along the northern side of the road which restricts waiting between the hours of 9-6pm, Monday to Saturday, but not on bank holidays or Sundays.

Visibility from the access appears to provide 2m x 2m pedestrian visibility splays. A stone/flint wall is located adjacent to the access and as no parking is permitted on this side of the road visibility.

Parking (Car and Cycle)

4 parking spaces are provided but WSCC are unsure if these will be safe to use. The plans do not show how a car can park and turn to exit in forward gear use these spaces without the need to reverse out which would cause a safety issue. WSCC would recommend offer 2/3 spaces over 4 to allow for turning to avoid reversing.

Bicycle parking should be provided for, usually 1 space per room, and these need to be secure and covered. WSCC promote the use of Sheffield stands and provide a communal area where these can be stored.

Construction Traffic

Whilst the house is being converted, we will need to be aware of these parking restrictions, and whilst there is a large forecourt for some parking, or the placing of skips it is restricted.

Trips

Once completed the house will provide accommodation for 8 people, however trips will be low by vehicle, and walking and cycling will generate a small number of people movements.

Summary

In conclusion, based on the information presented and viewed against paragraphs 115 and 116 of the National Planning Policy Framework, WSCC Highways are satisfied that this proposal would not result in any severe or otherwise unacceptable highway safety impacts. As such, no objection would be raised."

WSCC Response to Amended Plan

"Further to more information submitted WSCC acknowledge the proposed car parking for the HMO will still provide 4 spaces, which could cause reversing manoeuvres from the driveway. Ideally WSCC would recommend 3 spaces to allow for parking and turning to exit in a forward gear however given there area a mix of driveways on Rowlands Road where reversing movements from driveways could occur WSCC offer this as an advisory comment rather than absolute."

Sussex Police: The 'Designing Out Crime' Officer comments as follows: -

"The National Planning Policy Framework demonstrates the government's aim to achieve healthy, inclusive, and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas.

Although the level of crime and anti-social behaviour in Adur & Worthing District is average as indicated within Police.uk additional measures to mitigate against any identified local crime trends and site-specific requirements should always be considered.

The application seeks full planning permission from a lawful Class C3 Dwellinghouse to a Sui Generis House in Multiple Occupation (HMO) accommodating up to eight adults.

I have had the opportunity to examine the detail within the application and in an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments.

Historically there are cases where houses of multiple occupancy (HMO'S) have given rise to instances of antisocial 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 also 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 I have some concerns 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 any vulnerable tenants to access services to ensure that safe-guarding measures are maintained.

With regards to any proposed cycle parking - research by the 'Design against Crime Centre' suggests that cyclists should be encouraged to lock both wheels and the crossbar to a stand rather than just the crossbar and therefore a design of cycle stand that enables this method of locking to be used is recommended. The minimum requirements for such equipment are as follows:

- Galvanised steel bar construction (minimum thickness 3mm), filled with concrete;*

- *Minimum foundation depth of 300mm with welded 'anchor bar'.*

It is also the developer or developer's agent's responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of any bicycle storage facilities and/or other areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within buildings or the wider site footprint, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion powered vehicles have been considered and specified.

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. Further information can be found on the Information Commissioners Office: ICO Domestic CCTV systems

If not having done so already - the applicant and their partners are also strongly advised to consult directly with the fire service with regards to these proposed changes to discuss a fire risk assessment as they may have some of their own requirements to be implemented into the premises before occupation can take place.

Thank you for giving me an opportunity to offer comments in response. The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due regard to the likely effect on the prevention of crime and disorder. You are asked to accord due weight to the advice offered in this letter which would demonstrate your authority's commitment to work in partnership and comply with the spirit of The Crime & Disorder Act."

Environmental Protection, Environmental Health & Licensing: No adverse comments.

Environmental Health Private Sector Housing

Private Sector Housing has no objection to this application because it has the dimensions and basic layout to make a successful 8-person shared house HMO. It will require an HMO licence, so please direct the applicants to our compliance guide.
chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.adur-worthing.gov.uk/media/Media,170173,smxx.pdf

There are a couple of specific issues that could be picked up now rather than waiting for licensing: -

1) For shared house HMOs applicants need to provide a dedicated space for the occupants to sit down and socialise/consume meals, should they wish. This can be within the kitchen or a separate living space but should be proportionate in size to the number of occupiers sharing the dwelling. This may well be achievable within the

larger kitchen space but the chosen kitchen layout should be designed to accommodate this need.

2) The storage areas off the communal hallway should not be available for tenants use. The doors must be an FD30 fire door, fitted with 3 x certified steel butt hinges and intumescent strips. The cupboard must be free from belongings and the doors kept locked at all times.

Response to Amended Plan and Management Plan
No further comments.

Neighbour Representations: None received.

Relevant Planning Policies:

Worthing Local Plan policies (WBC 2023): SP1, SS1, DM1, DM2, DM5, DM15, DM16, DM17, DM22

National Planning Policy Framework (MHCLG 2024)

National Planning Practice Guidance

Planning Assessment:

Principle of Development

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 DM1(a) 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 DM1(c) 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).

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 effect on the character of the area and mix of dwellings;
- ii) Residential amenity of future occupiers;
- iii) Effects on neighbouring occupiers;
- iv) Highway safety.

Local Character and 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.

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.

This part of the North side of Rowlands Road between Byron Road and Heene Road (Nos 32-84 Rowlands Road and 39 Wordsworth Road) is predominantly made up of Victorian semi-detached and terraced villas. The typically 'grand' scale of these properties lends a predisposition to their subdivision into smaller units. Of these 29 properties, all but 5no have been converted into flats over many years (mostly between 1960-1990). Of the other 5 properties, one is a day centre (for Worthing Society for the Blind), 1no is the above-mentioned modern flat building comprising 10no units (36 Wordsworth Road), 2no are single dwelling houses (of which 1no had planning permission to be converted into flats in 2007 but appears not to have been implemented) and the other is the application property.

The planning history for the application property indicates it was in use as a children's home (Class C2) until 2014. The Certificate of Lawfulness issued under AWDM/1611/14 confirms that the change of use to dwelling house Class C3 (granted under AWDM/0355/14) was implemented. Since then, the property was apparently let out to YMCA providing supported accommodation for 6-7 adult service users with onsite staff (including sleep-in staff). There are no planning records relating to this specific use, which may or may not fall within a Class C3 use depending on whether

the residents lived together as a single household and the level of care provided by staff. The property was vacated in December 2025.is currently vacant.

Clearly, the nature of the older building stock in this area, and its propensity for subdivision into smaller units, has resulted in a more intensified use of buildings, and higher residential densities than in more suburban locations of the town. The proposed change of use of the property to an 8-person HMO would not be inconsistent in this context.

Similarly, those parts of the town characterised by older housing such as Heene, Central and Selden wards, typically have higher numbers of HMOs than elsewhere in the town. Even so, in the absence of any set numerical limit or specified threshold specified within policy DM1 regarding the development of new HMO accommodation, it is difficult to argue that there is an overconcentration of HMOs, or that they represent a dominant type of accommodation in this area, such as to warrant refusal of the application on that basis. It is pertinent that the size of the proposed HMO with up to 8 residents, is not substantially larger than could be achieved as permitted development (through change of use to Class C4).

No changes are proposed to the external appearance of the building. Should the Applicant choose to take up the advice of Sussex Police, CCTV cameras can typically be installed as permitted development subject to the limitations set out under Class F, Part 2, Schedule 2 of the GDPO.

Residential amenity of future occupiers

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

The proposed plans show 8 bedrooms in total varying in size between 9.0sqm and 20.1sqm. All will be single occupancy rooms. All but one of the bedrooms (Bedroom 2) will rely on shared bathroom/WC facilities on the ground and first floor.

Communal kitchen(s), a living/dining room and utility room are shown on the ground-floor and is considered proportionate to the number of occupants.

The revised Management Plan confirms that the communal areas will be cleaned at least weekly.

It is considered a satisfactory standard of living accommodation would be provided for future occupants with good sized bedrooms which exceed minimum NDSS, adequate

communal living/cooking/dining space, plus a good-sized, private external amenity area to the rear.

Effects on neighbouring occupiers

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.

Whilst no representations have been received in relation to the current application, other similar applications elsewhere in the town have generated concerns about the potential impacts of larger HMO properties, including increased noise, disturbance and anti-social behaviour/fear of crime.

Planning records indicate this property had a long history of shared/communal residential use dating from the early 1970's, including as bedsitting rooms and subsequently an elderly person's home and then a children's home (until 2014). There are no formal records relating to the most recent use (until December 2025) by the YMCA DLG as a group house for up to 6 or 7 unrelated adults with on-site support (which may or may not have been lawful for planning purposes).

It can reasonably be expected that the intensity of activity generated by those uses would not be dissimilar to that of up to 8 residents occupying the proposed HMO.

It is also worth pointing out the mixed character of this road which includes various retail and commercial uses on the south side.

The revised Management Plan provided by the applicant confirms that the property will not operate as temporary emergency housing, supported housing, a hostel or for short-term holiday lets (for which a separate planning permission would be required).

It states that rooms will be occupied through Assured Shorthold Tenancies (ASTs) or equivalent and that the property will be operated in accordance with the relevant HMO licensing and fire safety requirements.

Prospective residents will be subject to a formal onboarding process including identity verification, 'Right to Rent' checks (where relevant), employment/income checks, and previous landlord references.

Residents will be provided with clear written terms including 'house rules' and expected standards of behaviour. It states the property will be inspected by management at least weekly with additional visits undertaken where necessary. House rules seek to encourage respectful behaviours to other residents and neighbours with no loud music, shouting or disturbance audible outside the property. The rear garden and outdoor areas must be used considerably with no excessive noise, or gatherings outdoors late at night.

A breach of rules will result in a 3-step enforcement procedure comprising verbal or written warning; final written warning; and formal tenancy action seeking possession (in accordance with relevant legislation).

A management contact number will be made available for residents and neighbours with a 24-hour number maintained for urgent matters. Where matters involve criminal behaviour, emergencies or safeguarding concerns residents or neighbours may also be directed to the Police or emergency services as appropriate.

In conclusion, it is considered the submitted Management Plan demonstrates a professional approach to the management of the property through robust operational procedures, frequent oversight, and open communication with tenants, neighbours, and the Council (PSH licensing team) which will help prevent any adverse amenity impacts arising from the proposed use.

Highway safety and access

Provision is shown for 4no vehicles on the site frontage utilising the existing site access off Rowlands Road.

It was suggested in response to the comments of the LHA that the number of onsite parking spaces on the frontage be reduced from 4 to 2 or 3 to avoid reversing manoeuvres onto Rowlands Road. The Applicant has declined to do so with the amended plan confirming that vehicles would indeed need to reverse onto the public highway to either access or egress the 4no parking bays. However, the LHA has not raised an objection to this on highway safety grounds, noting that a similar arrangement exists at other properties in Rowlands Road.

Covered, secured cycle storage provision is shown within an existing outbuilding in the rear garden.

There is adequate space (further north) to the side of the dwelling for refuse/re-cycling bins to be stored without interfering with the frontage parking layout.

Recommendation:

APPROVE subject to condition(s):-

1. Drawing Numbers
2. Standard time limit
3. The HMO use hereby permitted shall be operated in accordance with the submitted Management Plan and the specified management measures contained therein. Any material change or alteration to the management measures stipulated in the approved Plan, including the 'Nature of Occupation' set out in Section 2, will require a revised Management Plan to be submitted to and approved in writing by the LPA prior to the commencement of the change/alteration.
4. Number of occupants limited to 8.
5. Provide secure, covered cycle parking/store prior to first use

Informative

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

Sussex Police Advisory

HMO Licensing

Is recommendation contrary to letter(s) of representation? N

Case Officer: Jo Morin Date: 27.04.2026

Authorised by: Louise Prew Date: 28/04/2026