

Date: Mon, 18 Aug 2025 at 08:07  
Subject: Comments for Planning Application AWDM/0954/25  
To: <[planning@adur-worthing.gov.uk](mailto:planning@adur-worthing.gov.uk)>

## Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 18/08/2025 8:07 AM from Miss Paula Sequeira.

### Application Summary

Address:	Marine View 111 Marine Parade Worthing West Sussex BN11 3QG
Proposal:	CHANGE OF USE FROM GUEST HOUSE (CLASS C1) TO LARGE HOUSE IN MULTIPLE OCCUPATION (SUI GENERIS)
Case Officer:	Jo Morin

[Click for further information](#)

### Customer Details

Name:	Miss Paula Sequeira
Email:	
Address:	Flat 3 112 Marine Parade Worthing West Sussex

### Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	<ul style="list-style-type: none"><li>- Highway Access and Parking</li><li>- Loss of General Amenity</li><li>- Other</li><li>- Overdevelopment</li><li>- Privacy Light and Noise</li></ul>
Comments:	<p>I write to object to the planning application proposing the conversion of the existing small hotel at 111 Marine Parade into a House in Multiple Occupation (HMO) for up to 14 individuals.</p> <p>1. Local Plan Policy - Worthing Local Plan (2020-2036)</p> <p>The Worthing Local Plan was formally adopted on 28 March 2023 and now provides the statutory framework for planning decisions in the borough Adur</p>

& Worthing Councils. Although I do not have the exact policy code for amenity protection at hand, your Development Management Policies explicitly emphasise that development must not adversely affect existing residential character or amenity. The scale and intensity of housing fourteen unrelated people in one property is clearly incompatible with the surrounding residential context.

## 2. Use Classification - "Sui Generis" HMO

According to legislation, properties occupied by more than six unrelated persons no longer fall under Use Class C4 but instead are considered sui generis and require full planning permission. This application is thus rightly subject to strict scrutiny given its scale and classification.

## 3. Licensing and Housing Standards

An HMO accommodating five or more tenants must be licensed by Adur & Worthing Council under national HMO standards

Adur & Worthing Councils. Licensing requirements include:

Adequate space, fire safety measures, and shared amenities

Compliance with Housing Health and Safety Rating System (HHSRS)

Adherence to the Council's HMO compliance guidance  
Adur & Worthing Councils

Given fourteen occupants, this property must meet higher safety and amenity standards. The application lacks sufficient detail on how these requirements will be met.

## 4. Overdevelopment, Parking and Highway Safety

Large-scale HMOs typically generate substantial car usage, placing heightened parking pressure and creating highway safety risks in already congested areas. The application does not propose sufficient solutions to mitigate traffic generation or parking impacts.

## 5. Noise, Disturbance, Loss of Amenity

A property housing fourteen residents introduces significant potential for noise, disturbance, and loss of neighbourly amenity-contrary to the principles underpinning the Local Plan's protection of existing residential character. As you probably know Rowlands Road has already a significant amount of bedsits. The safety around this area is very poor. As a single woman, living on my own, I don't leave my property once it is dark. I fear that my sense of safety will be severely impacted even further which is not acceptable.

## 6. Waste Management and Environmental Concerns

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The volume of refuse from fourteen occupants will be significant. The application fails to demonstrate robust arrangements for waste storage, collection, or environmental hygiene-posing risks to local cleanliness and public health.

#### 7. Precedent and Cumulative Impact

Permitting this conversion risks setting a precedent for converting other small hotels into large HMOs. This would erode the balanced housing mix within Worthing and erode community stability.

In summary:

This application-the conversion of a small hotel into a 14-person HMO-constitutes clear overdevelopment, conflicting with Worthing's adopted Local Plan (March 2023). It fails to demonstrate compliance with necessary sui generis use planning, HMO licensing standards, amenity protections, parking, waste management, and community character safeguards.

I respectfully urge the Council to refuse this application in line with its policy framework and the public interest.

Thank you for considering my objection.

Yours faithfully,  
Paula Sequeira

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