



LEWIS & CO

PLANNING STATEMENT

128 TARRING ROAD, WORTHING

ON BEHALF OF KTLX LTD



Client: KLTX LTD

Site Location: 128 TARRING ROAD, WORTHING, BN11 4HA

Job History:

Version	Date	Author	Checked	Notes
V1	12/05/2026	J Pearson	S Bareham	
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1.0 INTRODUCTION AND SUMMARY

- 1.1 This Statement has been prepared on behalf of KTLX Ltd (the applicant) in support of an application for full planning permission at 128 Tarring Road, Worthing.
- 1.2 Planning permission is sought for the *change of use from Use Class C4 (small house in multiple occupation) to sui generis house in multiple occupation*. The proposal would increase the maximum occupancy of the property to seven persons.
- 1.3 No external alterations or changes to the internal layout are required, as an existing ancillary office space would be utilised as a seventh bedroom.
- 1.4 This statement should be read in conjunction with the accompanying application documents and drawings prepared by BPM:
 - Application forms
 - CIL Form 1: Additional Information
 - Existing Floor Plans, Elevations and Section (Drawing Number 3134.01)
 - Proposed Floor Plans, Elevations and Section (Drawing Number 3134.02)
- 1.5 This Statement will demonstrate that planning permission should be granted for the proposed works. It provides an analysis of:
 - The site and surrounding context
 - Relevant planning history
 - The proposed development
 - Relevant planning policies; and
 - A planning assessment setting out compliance with relevant planning policies in relation to the principle of development and all other material considerations



2.0 APPLICATION SITE & SURROUNDING AREA

- 2.1. The application site is an existing house in multiple occupation at 128 Tarring Road, in central Worthing. The use currently falls within Use Class C4 (three to six unrelated occupants) and is occupied by six unrelated persons.



Site and surrounding context

- 2.2. The property is on the north side of Tarring Road opposite St Matthews Church and the junction with Shakespeare Road.
- 2.3. The site is within easy walking distance of both Worthing and West Worthing railway stations and close to the town centre. The property forms part of a linear pattern of development immediately south of the railway.
- 2.4. The property features a large communal kitchen/dining and living space as well as a rear garden. All bedrooms benefit from ensuite bathrooms and exceed both licensing and national space standards.
- 2.5. Full details of the existing bin store are shown on the submitted drawings. The bin store is 1.34m x 1.2m double wheelie bin store with a timber frame and panelling.



Existing bin store (product photo)

- 2.6. The property also benefits from an Asgard lockable cycle store at the front of the property, with further lockable storage for bicycles in the rear garden.



Flood Map for Planning extract

- 2.7. The site is located within Flood Zone 1 (lowest risk of fluvial flooding) and at low risk of surface water flooding.



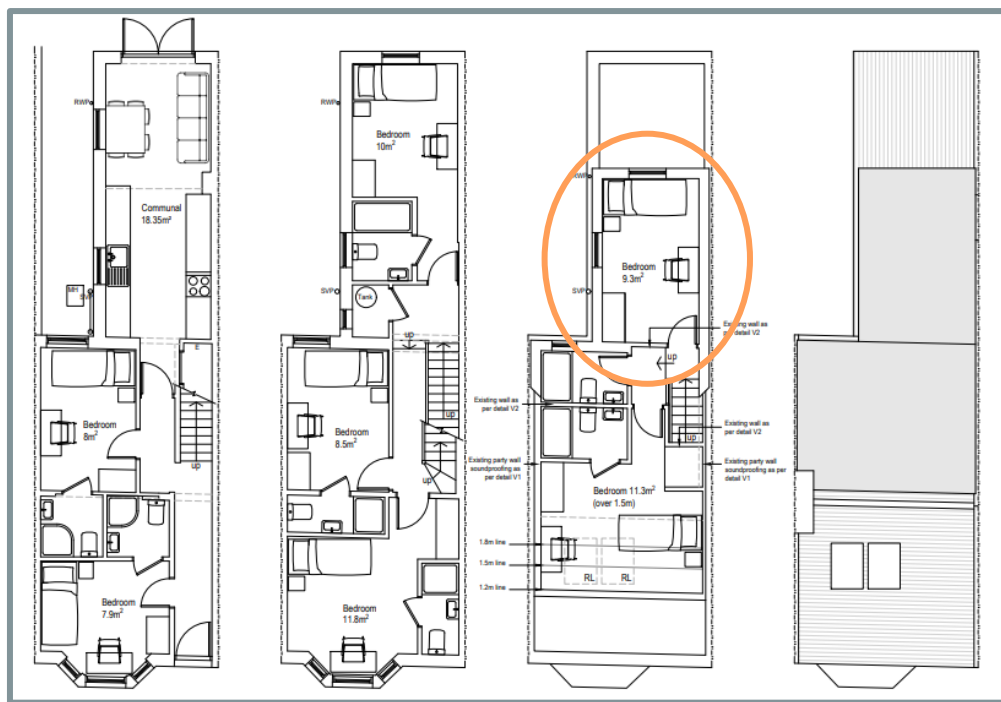
3.0 PLANNING HISTORY

- 3.1 The application site was the subject of a certificate of lawfulness application in 2025 under reference **AWDM/1161/25**.
- 3.2 The certificate of lawfulness application was approved and confirmed that the properties use as a Use Class C4 dwellinghouse was lawful. It also confirmed the lawfulness of a second-floor loft extension under permitted development rights.
- 3.3 Works were subsequently undertaken, and the property has been in use as a Use Class C4 dwellinghouse since.
- 3.4 The property retains its character as a residential dwellinghouse, with a ground floor living, kitchen and dining room and ground, first and second floor bedrooms. Residents will share normal facilities required for day-to-day private domestic existence (i.e. the 'Gravesham test' in planning law).
- 3.5 As part of the works undertaken, the applicants introduced additional soundproofing to both party walls and internal walls within the second-floor accommodation. Full details are shown on the proposed drawings (drawing number 3134/02).



4.0 PROPOSED DEVELOPMENT

- 4.1 As described above, the development proposed is the *change of use from Use Class C4 (small house in multiple occupation) to sui generis house in multiple occupation*.
- 4.2 The change of use proposed would increase the maximum occupancy of the property by one resident.
- 4.3 No external works are proposed as part of the change of use. The property was previously extended at second floor level under permitted development rights with the addition of a rear roof dormer.
- 4.4 The internal layout would remain as existing with a second-floor shared ancillary study space instead being used as a seventh bedroom.



Proposed Floor Plan (room changing use circled)

- 4.5 The floor plan submitted shows that all bedrooms can comfortably benefit from a study/homeworking space.



5.0 RELEVANT PLANNING POLICIES

5.1 The following policies of the Worthing Local Plan 2023 are relevant to this application.

5.2 Policy DM1: Housing Mix supports the principle of converting existing properties to HMO uses and states:

“f) When considering proposals for the conversion of dwellings into smaller units of self-contained accommodation, the proposal must provide a high standard of accommodation that complies with internal space standards and requirements for private outdoor space. In addition, the Council will consider:

- i) the impact on the mix of dwellings locally*
- ii) the impact on the character of the area*
- iii) the impact on the amenity of adjoining dwellings*
- iv) the quality of the accommodation. Applications for the change of use to a C4 use, a mixed C3/C4 use or to a sui generis HMO use should also demonstrate that the communal living space and cooking and bathroom facilities are provided appropriate in size to the expected number of occupants.”*

5.3 Policy DM2 (Density) places an expectation on new dwelling proposals to meet the Nationally Described Space Standards for internal floorspace.

5.4 Policy DM15 (Sustainable Transport and Travel) promotes developments that prioritise active travel and reduce the proportion of journeys made by private car. The policy seeks to achieve this by directing development to sustainable locations with good access to schools, shops, jobs and other key services.



6.0 PLANNING ASSESSMENT

6.1 The key material planning considerations relevant to this proposal are:

- The Principle of Development
- Standard of Accommodation
- Impact on Neighbouring Amenity
- Design and Visual Impact
- Transport and Active Travel
- Flood Risk and Drainage

6.2 These considerations are dealt with in turn below.

Principle of Development

6.3 The site is located within the built-up area boundary of Worthing, where planning policies broadly support new development and the delivery of new residential accommodation.

6.4 The application requires no physical works to the property and would be undertaken through the use of an ancillary shared study space as a self-contained bedroom.

6.5 The principle of introducing new HMO accommodation is supported by Policy DM1 of the adopted Local Plan (2023). The Local Plan recognises that shared accommodation forms an important part of local housing needs and conversions of existing homes to houses in multiple occupation (HMO) can provide high quality affordable accommodation.

6.6 The site is well-located in central Worthing, with close proximity to the town centre and railway stations. As a result, it provides a sustainable location for future residents and ensures that residents are not reliant on private vehicle use.

6.7 Policy DM1 emphasises the need for new HMO accommodation to offer a high standard of accommodation for future residents and to protect the amenity of



adjoining dwellings. These considerations are addressed in detail under relevant sub-sections below.

- 6.8 HMOs are recognised in local planning policy as an important part of local housing stock providing entry-level accommodation, particularly for those who can't access other forms of housing or wish to live in a social/communal setting.
- 6.9 Paragraph 61 of the National Planning Policy Framework (NPPF) also supports the delivery of housing for groups with specific housing requirements. Paragraph 63 clarifies that this improves those who need shared/rental housing.
- 6.10 There are currently high levels of demand for HMO accommodation due to affordability factors, as well as other lifestyle factors. Shared accommodation also provides suitable accommodation for individuals who are new to the area or temporary residents due to work and study commitments. Shared accommodation is therefore an important source of residential housing and a necessary part of the housing market, meeting needs that cannot be addressed by other forms of housing.
- 6.11 The proposals will make more efficient use of the existing building through the conversion of ancillary areas of the building to habitable residential accommodation. This aligns with the objectives of Policy DM2 (Density) of the Local Plan and paragraph 129 of the NPPF.
- 6.12 On this basis, the proposed development is acceptable in principle and supported by local and national planning policies. Other material considerations are addressed in detail below.

Standard of Accommodation

- 6.13 The dwelling will be arranged as a seven-bedroom houses in multiple occupation (*sui generis*), with all bedrooms to be single occupancy. The proposal will offer a good standard of accommodation for all residents, with the main ground floor communal area retained alongside well-sized bedrooms and convenient facilities that meet all relevant licensing and planning standards for HMOs.



- 6.14 All bedrooms meet national standards for single occupancy rooms and offer functional layouts. Indicative furniture layouts are shown on the submitted drawings and demonstrate that these rooms can accommodate the furniture required by residents for comfortable residential living.
- 6.15 Each bedroom benefits from its own shower room or ensuite.
- 6.16 The communal area allows residents to cook, dine and socialise together or independently. The space is arranged as an open plan living space where residents will be able to cook, eat and socialise together. Although residents will let rooms on an individual basis, the conventional residential layout of the property will ensure that there is an element of social cohesion between residents.
- 6.17 The property will meet all day-to-day needs of residents as a result. The proposals have been designed in full accordance with the Council's licensing requirements for a seven-bedroom HMO.
- 6.18 All habitable rooms within the proposed residential unit have adequate provision of natural light and would provide a good standard of accommodation.
- 6.19 The application site already benefits from an existing cycle store at the front of the property alongside refuse and recycling storage facilities. A further secure storage container is provided for residents within the rear garden.
- 6.20 Nationally described technical housing standards do not fully align with HMO uses (as HMO accommodation typically consists of single occupancy bedrooms only), however all other relevant technical requirements within the guidance have been met including meeting minimum bedroom sizes of 7.5m². The new bedroom proposed is 9.3m².
- 6.21 The proposals therefore comply with relevant requirements of Policy DM2 (Density) of the Local Plan and other local and national policy guidance.



Neighbouring Amenity

- 6.22 The proposals will not alter the external envelope of the building and will continue to be used in the same way as currently - with the exception of one ancillary second floor room changing use to a bedroom.
- 6.23 The impact of the development is limited to the addition of one extra occupant. The difference in occupancy between a six person HMO and a seven person HMO is unlikely to result in any materially different impacts as the exact occupancy of the property is unlikely to be appreciable from outside of the property itself.
- 6.24 The additional occupant will result in a small uplift in terms of comings and goings and normal residential activity; however the application site is within central Worthing where residential densities are already moderately high and there is an accepted level of residential activity. Tarring Road itself is a fairly busy east-west route and the site and its surrounding area are not especially sensitive to minor changes in occupancy and activity.
- 6.25 The use of the second-floor room as a bedroom is a conventional use of the converted loft space and compatible with typical adjoining uses, which are likely to be bedrooms or lofts.
- 6.26 The applicants have already installed an enhanced level of soundproofing to the party walls as second floor level as part of the works undertaken for the rear roof extension, in excess of minimum requirements for sound insulation under Part E (Resistance to Sound) of building regulations. The soundproofing specification is designed to achieve a 56 dB reduction in noise levels.
- 6.27 Both World Health Organisation 'Guidelines for Community Noise' and the relevant British Standards (BS 8233:2014) recommend an internal LAeq of 30dB for optimal sleep conditions. This means that the soundproofing introduced in isolation would be capable of preserving optimal sleep conditions even with noise of up to 86 dB within the second-floor bedrooms. This means that nighttime noise from human conversation (approximately 60dB) or TV audio (approximately 55dB - 70dB) would not come close to adversely impacting upon sleeping conditions in an adjoining room or property.



- 6.28 The soundproofing already installed therefore ensures that neighbours (and other residents) will be protected from adverse noise impacts from normal human activity – even if this were to occur at anti-social hours.
- 6.29 The property would be subject to appropriate management by a specialist HMO landlord. However, if any noise impacts from activities that exceed what is a reasonable residential use of the property, these would be subject to normal management interventions (or otherwise would be treated as a ‘noise nuisance’ and would be subject to the Council’s normal enforcement powers available to environmental health officers).
- 6.30 Planning practice guidance (see PPG Ref: 30-005-20190722) states that action/mitigation is only required where noise is “present and intrusive”. The increase in occupation by one resident and changes to the layout of the building are not likely to be “present and intrusive”. On this basis, the mitigation measures already installed are not a requirement under current guidance but have nevertheless been provided by the applicants in line with best practice, in order to enhance the quality of accommodation for residents and minimise any potential for noise impacts.
- 6.31 As there will be no physical alterations to the building, there is no potential for new neighbouring amenity impacts in relation to daylight, sunlight, or sense of enclosure.
- 6.32 The new bedroom is any existing room used by residents and no changes are proposed to the existing windows. There will be no additional impacts in terms of privacy and overlooking as a result of the development proposed.
- 6.33 For these reasons, no material adverse impacts relating to neighbouring amenity would arise as a consequence of the development.

Design and Visual Impact

- 6.34 As the proposed change of use requires no physical alterations to the property externally and will retain the existing layout, there will be no visual impact on the wider area.



- 6.35 The property will retain its character as a residential dwellinghouse under the proposals and there will be no appreciable impact on the character and appearance of the wider area.
- 6.36 On this basis the application is neutral in terms of design and visual impact.

Transport and Active Travel

- 6.37 Policy DM15 (Sustainable Transport and Active Travel) of the Worthing Local Plan aims to re-balance travel choices by promoting developments that prioritise active travel and non-car modes of transport.
- 6.38 The application site is in a highly sustainable location, ensuring that residents can easily access local services and employment opportunities on foot. This location will significantly reduce the number of private vehicle trips to and from the site, compared to delivering these additional shared accommodation in a less sustainable location and the proposal therefore directly supports the aim of Policy DM15 as a result.
- 6.39 The site is within Controlled Parking Zone J where parking restrictions apply from 10AM and 11AM and again between 2PM and 3PM, Monday to Saturday. The Council is therefore able to control or restrict on-street parking outside of the planning system through permit parking, and could limit the number of permits issued to this property if the Council were to consider this necessary.
- 6.40 Residents will have good access to sustainable modes of transport, with bus services available outside of the property on Tarring Road (6 and 10 bus routes) and train services within easy walking distance at both Worthing railway station and West Worthing railway station. Residents would not be dependent on private vehicle use for any trips as a result.
- 6.41 For the reasons set out above, the proposed increase in occupancy by a single person is unlikely to have a material impact on local transport or highways network.



Flood Risk and Drainage

- 6.42 The site is in flood zone 1 (lowest area of flood risk), as confirmed by the Environment Agency flood map for planning, see extract below.



Flood Map for Planning extract

- 6.43 Surface water flood modelling for climate change scenarios (2061 to 2125) show that properties on Tarring Road – including the application site – are at risk of surface water flooding. However, as the development proposed would not increase flood risk or the vulnerability of the development the Council have confirmed that a Flood Risk Assessment is not required.
- 6.44 The proposed development would not change the vulnerability of the existing use and will not increase flood risk in any material way. Existing drainage arrangements will be unchanged and no new connections are needed.
- 6.45 On this basis there would be no increase in flood risk or vulnerability as a result of the development.



Other considerations

- 6.46 The works proposed do not affect any areas of existing biodiversity habitats and therefore statutory biodiversity net gain does not apply in this instance. The development is considered 'de minimis' in this regard.



7.0 CONCLUSIONS

- 7.1 Planning permission is sought for a *change of use from Use Class C4 (small house in multiple occupation) to sui generis house in multiple occupation* at 128 Tarring Road, which would increase the occupancy of the property from six occupants to seven.
- 7.2 No external works are required and the existing internal layout would be maintained with a second-floor office space being converted to use as a single-occupancy bedroom.
- 7.3 The property would continue to provide a good standard of amenity for all residents and there would be no material adverse effects. Upgraded soundproofing has already been installed within the second floor as part of earlier works.
- 7.4 The proposals result in the delivery of additional residential accommodation in a highly sustainable location within central Worthing, close to existing shops and services and with excellent access to local bus and rail services.
- 7.5 Overall, the proposals meet all relevant requirements of the Worthing Local Plan (2023) and the National Planning Policy Framework. Worthing Borough Council is respectfully requested to grant planning permission for the proposed development accordingly.

Lewis and Co Planning
June 2026