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PLANNING STATEMENT

**Fitzroy Lodge, 2-4 Windsor Road, Worthing,
BN11 2LX**

**Change of use of care home (Use Class C2) to larger
House of Multiple Occupation (Sui Generis) with 25
bedrooms.**

September 2026

INTRODUCTION

- 1.1 This Statement is submitted in support of a full planning application for the change of use of the former residential care home from Use Class C2 (residential institutions) to a house in multiple occupation (HMO) providing 25no. bedrooms. As the proposed HMO would accommodate more than six unrelated occupants sharing facilities, it falls outside Use Class C4 and constitutes a sui generis use.
- 1.2 The purpose of this statement is to describe the application site and its surroundings, to explain the proposed development, to set out the relevant national and local planning policy framework, and to demonstrate that the proposal represents an acceptable and sustainable form of development that accords with the development plan when read as a whole.
- 1.3 The remainder of this statement is structured as follows: Section 2 describes the site and its context; Section 3 describes the proposed development; Section 4 assesses the proposal against the relevant planning policies and other material considerations; and Section 5 sets out the planning balance and conclusion.

SITE CHARACTERISTICS AND CONTEXT

- 2.1 The application site is located on the east side of Windsor Road, Worthing, and comprises a large, three-storey detached property (Fitzroy Lodge). It forms part of an established residential area a short distance from Worthing town centre and close to the seafront. The site is broadly rectangular in shape, with the building set back behind a hard surfaced frontage and a garden to the rear.
- 2.2 The building is of traditional brick construction beneath a pitched and tiled roof. A key design feature is its dual-frontage bay windows and gables within the roofline, which reflect a characteristic feature of the older residential properties along Windsor Road. It is a locally distinctive building of some scale and presence in the street scene.
- 2.3 The survey of the building confirms that the care home offered 25 bedrooms arranged over the ground and first floors, together with communal lounges, a dining room, kitchen, offices and ancillary staff and service areas. The second floor was previously used for storage. A lift connects the ground and first floors, and two staircases serve the building, one continuing to the second floor.

- 2.4 Externally, a driveway to the front provides off-street parking for approximately five vehicles, with access taken directly from Windsor Road. There is a garden to the rear, together with an outbuilding used for storage and a conservatory. There is an external staircase provided for fire-escape purposes. The building has further access points to the side and rear.



Fitzroy Lodge viewed from Windsor Road

- 2.6 East Worthing railway station is approximately 0.7 miles to the north and Worthing railway station approximately 1.2 miles to the north-west, both providing regular services to Brighton, London and the wider South Coast. Frequent bus services operate nearby. The site is within walking distance of local shops, bus stops and everyday amenities, with the town centre around 15 minutes' walk away, and the seafront which provides open space for outdoor recreation and amenity a few minutes' walk to the south. The site, therefore, benefits from a high level of accessibility by public transport, walking and cycling, and represents a highly sustainable and accessible location for residential use of the kind proposed.
- 2.7 The site is not subject to any other planning policy, ecological, heritage or environmental designations that would constrain its proposed use as an HMO.

THE PROPOSED DEVELOPMENT

- 3.1 Planning permission is sought for the change of use of the building from a former residential care home (Use Class C2) to a large house in multiple occupation (sui generis). The Council's Compliance Guide for Houses in Multiple Occupation (2023) confirms that large HMOs of seven or more people fall within the sui generis use class, and the proposal is submitted on that basis.
- 3.2 The HMO would offer 25no. bedrooms, to be let on an individual-room basis. The building would be held in single ownership and operated and managed as a single HMO planning unit.
- 3.3 Internally, the accommodation is arranged into five sub-units, each providing a large open-plan kitchen, dining and living area serving groups of en-suite bedrooms. This clustered arrangement is an internal design and fire-safety measure, providing compartmentation between groups of rooms and manageable shared facilities.



Proposed ground (top) and first (bottom) floor plans and zones of sub-division comprising bedrooms, and communal spaces



Proposed second floor plan as part of first floor zone of sub-division
comprising bedrooms, and communal spaces

- 3.4 The second floor provides two further bedrooms, which share communal facilities with the unit on the floor below and form part of the proposed single HMO use of the building. As such these are not self-contained flats.
- 3.5 Most bedrooms would benefit from its own en-suite facilities, however 2no. of the rooms have access to communal shower facilities. Residents would share the cooking, dining and living space shared in the associated communal areas. The mix of room sizes and the provision of communal facilities are shown on the submitted plans and are addressed against the relevant standards in Section 4 of this statement.
- 3.6 The proposal involves no material alterations to the external appearance of the building. The works are internal, comprising the sub-division and reconfiguration necessary to form the HMO units, together with associated fire-safety, drainage and servicing works. Off-street parking for five vehicles, secure cycle parking, and refuse and recycling storage would be provided, together with rear garden amenity space, as shown on the submitted layout plan.
- 3.7 The HMO would be subject to mandatory licensing under the Housing Act 2004, which would control the maximum permitted occupancy and the standard of the accommodation and facilities. It would be managed in accordance with the Adur & Worthing Compliance Guide for Houses in Multiple Occupation (2023) and the Management of Houses in Multiple Occupation (England) Regulations 2006. The applicant is content for the single-HMO operation and occupancy to be secured by planning condition if the Council considers it necessary.

PLANNING POLICY ASSESSMENT

- 4.1 The development plan for the area comprises the Worthing Local Plan 2020–2036 (WLP), adopted on 28th March 2023. The Council also maintains several supporting Supplementary Planning Documents (SPDs) that provide further guidance for development proposals to follow.

National Planning Policy Framework (August 2026)

- 4.2 The National Planning Policy Framework (August 2026) establishes a strong national policy direction towards increasing the supply of housing and making more effective use of land and buildings within established settlements. This is particularly relevant to the present application because the proposal does not require the development of undeveloped land but instead makes considerably more effective residential use of an existing substantial building within the established urban area of Worthing.
- 4.3 Policy S3 of the NPPF establishes the presumption in favour of sustainable development and provides the overarching decision-making framework within which development proposals should be considered. This policy is now closely linked to the location of development and the specific national decision-making policies contained within the Framework. The proposal is situated wholly within the established urban area of Worthing and represents the reuse of an existing residential/institutional building for an alternative form of residential accommodation.
- 4.4 Of particular significance is Policy S4 (Principle of development within settlements). Policy S4 establishes a positive approach towards development within settlements, providing that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies within the Framework. The starting point established by national policy is therefore supportive of additional development within established settlements. The Government has explained that Policy S4 is intended to provide greater certainty for development within settlements, including the redevelopment and more effective use of brownfield land.
- 4.5 The application falls squarely within the spatial principle established by Policy S4. It would accommodate up to 25 residents within an existing building in Worthing's established urban area without requiring outward expansion of the settlement or development of greenfield land. The residential intensification of this existing building therefore represents an inherently sustainable approach towards accommodating additional housing need.

- 4.6 Policy HO7, meeting evidenced local housing needs is also directly relevant. Policy HO7 requires decision-makers to give substantial weight to the benefits of providing homes which contribute towards the evidenced accommodation needs of the local community. This is an important consideration in assessing the present proposal because national policy is concerned with meeting accommodation needs and does not restrict the concept of housing benefit solely to the provision of conventional Class C3 houses and flats.
- 4.7 A House in Multiple Occupation performs a particular function within the housing market. It provides accommodation principally suited to single-person households and people seeking rented accommodation who may not require, or may not be able to access, a conventional self-contained dwelling. Each of the 25 bedrooms would provide the principal residential accommodation of an individual occupier, supported by the communal facilities within the building. In practical terms, the development therefore has the capacity to provide a home for up to 25 people.
- 4.8 Consequently, whilst the proposal should not artificially be presented as providing 25 additional Class C3 dwellings, neither should the housing contribution of those 25 residential bedspaces be disregarded. The development would materially increase the capacity of Worthing's housing stock and provide an alternative form of accommodation within the private rented sector. In accordance with Policy HO7, this represents a tangible housing benefit to which positive weight should be afforded, and substantial weight where the accommodation responds to an evidenced local need. The Government's explanation of the August 2026 Framework confirms that Policy HO7 specifically directs decision-makers to give "substantial weight" to homes which contribute towards the evidenced accommodation needs of the local community.
- 4.9 Policy L2, making effective use of land provides further strong support for the proposal. Policy L2 brings together the national decision-making policies relating to the efficient utilisation of land and expressly supports opportunities for densification and intensification within already built-up areas. The Government has confirmed that the purpose of Policy L2 is to support densification in urban areas and to provide greater certainty for proposals which make more intensive use of existing developed sites.
- 4.10 The proposal is entirely consistent with that objective. A substantial existing building, formerly occupied as a care home, can accommodate 25 residents without the need to construct 25 individual dwellings or consume the amount of land which would otherwise be required to accommodate an equivalent residential population through conventional housing development. The proposal therefore represents a particularly efficient use of an existing building and urban site.

- 4.11 The relationship between Policies S4, HO7 and L2 is important. Policy S4 establishes a positive starting point for development within settlements; Policy HO7 requires substantial weight to be given to homes which contribute towards evidenced accommodation needs; and Policy L2 encourages the effective use and intensification of existing urban land and buildings. The application responds positively to each of those national policy objectives.
- 4.12 Moreover, the development would provide this additional residential capacity through the reuse of an existing building rather than through substantial demolition and redevelopment. It would therefore retain the embodied resources within the existing building whilst accommodating a materially greater number of residents. This represents an efficient and sustainable form of urban intensification.
- 4.13 The correct approach in the planning balance is therefore not simply to ask whether the 25 bedrooms can be counted numerically as 25 dwellings for housing land supply purposes. They cannot necessarily be equated on that basis, and no such claim is made. Rather, the relevant consideration is whether the proposal increases the amount, diversity and availability of residential accommodation within Worthing. Plainly, it does.
- 4.14 The proposal would provide homes for up to 25 residents; broaden the range of accommodation available within the local housing market; respond to the accommodation requirements of single-person and renting households; reuse an existing substantial building; and increase residential capacity within the established urban area without requiring the development of additional undeveloped land.
- 4.15 Accordingly, the provision of 25 HMO bedrooms represents a genuine and material contribution towards meeting housing and accommodation needs. When considered against the positive approach towards development within settlements established by Policy S4, the requirement to attach substantial weight to the provision of homes meeting evidenced accommodation needs under Policy HO7, and the support for efficient urban land use and intensification contained within Policy L2, the housing benefits arising from the development should attract significant positive weight in the overall planning balance.

Principle of Development – Local Plan

- 4.16 The site lies within the established urban area of Worthing, where the principle of residential use is well established and where the Local Plan directs new housing to be located.

- 4.17 Policy SS1 of the WLP sets out the spatial strategy for the plan. Criterion (d) (i) requires development to make efficient use of previously developed land at an appropriate density. This is clearly met as the proposal re-uses an existing building at a density the same as the former care home use (25no. proposed bedrooms compared with 25no. bedrooms in the care home), within the built-up area where the Local Plan directs new housing. The proposal, therefore, accords with the Council's overall spatial strategy and with the NPPF's emphasis on making effective use of land and bringing under-used buildings back into productive use.

Contribution to Housing Need and the re-use of previously developed land

- 4.18 Worthing has an acute and well-evidenced housing need as well as land supply constraints due the nature and size of the administrative area. By using this building for continued residential use, shall make a positive contribution to meeting housing needs and to the supply of shared, more affordable accommodation, consistent with Policies SS1 and DM2 (density) of the WLP. Delivering that housing through the re-use of an existing building also avoids the carbon cost of demolition and reconstruction.

The Proposed HMO use

- 4.19 Policy DM1 is expressly supportive of HMO accommodation. The supporting text at paragraph 5.5 recognises that shared accommodation, including well-designed HMOs, plays an important role in providing housing for people on low incomes and young professionals, and is often the only realistic housing option for people who would otherwise be homeless. The plan also identifies the importance of retaining and providing residential accommodation, including HMOs, given the limited land available for new housing in the borough (paragraphs 5.17–5.20). The proposal would offer 25 individuals with housing and would make a positive contribution to the supply of housing to the area.
- 4.20 Importantly, Worthing has no adopted policy seeking to control the concentration of HMOs (in contrast to some neighbouring authorities), and there is no numerical threshold against which the proposal must be assessed. The key policy requirement for an HMO within Policy DM1 relates to the quality of accommodation, which as is set out in Paragraphs 4.18 to 4.24 is acceptable for the type and density of development proposed.

The loss of C2 use

- 4.21 The proposed use of the HMO use will result in the loss of the existing lawful C2 care home use of the site. However, the care use has not been operational, and residents relocated to alternative provision. The proposal therefore does not displace an operating care home. Second, the building has been openly

marketed for sale as a care home through Christie & Co, a specialist care-sector agent without success over this time. The extensive marketing exercise undertaken without any serious interest in the continuing the building for its lawful care home use indicates there is no longer any realistic prospect of its retention in viable C2 use. That marketing evidence is attached in appendix A.

- 4.22 Furthermore, the Local Plan's own policy direction is to prioritise housing with care and housing with support over traditional care bed spaces (Policy DM1 (d)), so the loss of a conventional care home is consistent with, rather than contrary to, the plan's strategy for meeting the needs of older people. On this basis the loss of the care use is considered acceptable and is not a sustainable basis for resisting the application.
- 4.23 There is, in any event, no policy in the Local Plan that specifically protects residential care homes / Use Class C2 accommodation against loss. The resistance to the loss of residential accommodation in Policy DM1 (e) is expressly confined to Use Class C3 dwellinghouses and is therefore not engaged as the proposal is not for dwellinghouses.
- 4.24 The only policy under which the loss of the former care home might conceivably be considered against is Policy DM8 (community facilities). However, for the reasons set out below, DM8 is not engaged by the loss of a private residential care home:
- The facilities to which Policy DM8 is directed are identified in its supporting text (paragraph 5.106) as shared community spaces such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. A private care home, in which residents live and receive personal care, is not a facility of that kind.
 - The Local Plan deals with residential care homes under its housing policies rather than under Policy DM8. Paragraphs 5.14 and 5.15 treat them as specialist residential accommodation providing care bed spaces “classed as C2 provision”, and the Plan's glossary defines a care home as a residential setting in which older people live. Care homes are therefore addressed as a form of accommodation, not as a community facility. It follows that the loss of the former care home does not engage the protection against the loss of community facilities in Policy DM8(e).
- 4.25 In any event, and for the avoidance of doubt, even if Policy DM8 (e) were held to apply, the proposal would satisfy it. Criterion (e)(ii) permits the loss of a community facility where it is demonstrated that the premises are no longer required or viable in their current use and have been appropriately marketed for an alternative community use. The property has been extensively marketed but without any purchasers coming forward, the conclusion can be drawn that

there is no realistic prospect of retention for Use Class C2 or another community use.

Conclusion on principle of development

- 4.26 For the reasons set out above, the change of use is acceptable in principle. The site lies within the built-up area, where the spatial strategy directs residential development, and the change of use can help meet an acute housing need.
- 4.27 The loss of the former care home use has been shown to be acceptable and not contrary to any development plan policy. The proposal does not engage Policy DM1 (e), which resists the loss of residential accommodation, because that criterion applies only to Use Class C3 dwellinghouses; the existing lawful use is C2, and the change to an HMO represents a gain to the general housing stock rather than a loss. HMO accommodation of this kind is, moreover, expressly supported by the policies of the Local Plan.
- 4.28 The proposed change of use to an HMO is therefore acceptable in principle and accords with the development plan.

Standard of Accommodation and Living Conditions for Future Occupants

- 4.29 Policy DM1 of the WLP requires new HMO accommodation to provide a high standard of living environment that complies with internal space standards and provides appropriately sized communal living, cooking and bathroom facilities for occupants.
- 4.30 The relevant space and amenity standards are set out in the Adur & Worthing Councils Compliance Guide for HMOs 2023 as well as the HMO licensing standards under the Housing Act 2004. The proposed accommodation has been designed to meet these standards. The size of rooms required by the Compliance Guide is as follows:

Minimum Size	Permitted Occupancy
6.51 sqm	One person over the age of 10
10.22 sqm	Two people over the age of 10
4.64 sqm	One person under the age of 10
Smaller than 4.64 sqm	Cannot be used for sleeping.

- 4.31 As shown on the submitted plans, every proposed bedroom exceeds the Compliance Guide's minimum size of 6.51 sqm for single-person occupancy, and a number do so by a considerable margin with several being large enough to meet the 10.22 sqm standard for two people. The accommodation is, however, proposed and would be operated on a single-occupancy basis, with one person per bedroom, giving a maximum of 25 occupants. The applicant

would be content for this to be secured by planning condition. The generous room sizes are therefore relevant not as additional capacity but as an indicator of the quality of the accommodation, providing a spacious, comfortable and high-standard living environment that exceeds the minimum requirements in every case.

- 4.32 The provision of bedrooms, and shared amenities within the building shall accord with the Compliance Guide benchmark of one facility per five sharing occupants, including the requirement for a separate WC where five or more people share.
- 4.33 There is no prescribed minimum floor area for the communal living and dining space. The Compliance Guide requires only that such space be proportionate in size to the number of occupiers sharing the HMO, and it is evident from the submitted floor plans that each unit is served by generous living, dining and kitchen areas commensurate with the number of occupants they serve. Kitchen provision, by contrast, is set more specifically by the Compliance Guide by reference to the number sharing. This being broadly, a sink and drainer, an oven and four-ring hob and a fridge/freezer per five occupants, together with worktop and storage per occupant. The detailed specification of each kitchen will be confirmed at the final design stage and secured through the HMO licence, ensuring that facilities are provided in the correct ratio to the approved occupancy of each unit.
- 4.34 All habitable rooms would benefit from adequate natural light, outlook and ventilation, and the layout provides a spacious and comfortable environment for occupants. Overall, the development would provide good-quality, well-managed accommodation that supports occupiers' health and wellbeing, in accordance with Policies DM1, DM2 and SP3 of the WLP.
- 4.35 Finally, fire safety has been a key consideration in the design of the proposed HMO. The internal layout including the arrangement of the accommodation into separate units, the protected circulation routes shown on the submitted plans, and the provision of protected lobbies and escape routes has been designed to achieve appropriate fire separation and safe means of escape. The detailed fire-safety measures, including fire-resisting construction, doors, detection and alarm systems, will be secured and controlled through Building Regulations approval, the HMO licence. These matters are not for determination through this planning application, but the layout demonstrates that a safe and compliant HMO can be delivered within the existing building.

Impact on Neighbouring Residential Amenity

- 4.36 The amenity of neighbouring occupiers is protected by Policies DM5 (quality of the built environment) and DM22 (pollution). The building has an established residential institutional use, and the change to an HMO would not give rise to materially greater impacts in terms of overlooking, overshadowing or loss of light, as no significant external alterations are proposed
- 4.37 In relation to noise and disturbance, the intensity of use associated with the proposed HMO is expected to be less than the former care home, which itself accommodated multiple residents together with staff, visitors and servicing. Any potential for disturbance would be controlled through HMO licensing conditions and management arrangements, and, if necessary, through a planning condition requiring a management plan.
- 4.38 Refuse storage is proposed to be relocated to the frontage and stored in new bin enclosures, to minimise the effect on visual amenities within the street scene.
- 4.39 The proposal is therefore not considered to result in unacceptable harm to neighbouring amenity, in accordance with Policies DM5 and DM22.

Design, character and appearance

- 4.40 Policies DM5 and DM16 (sustainable design), and Chapter 12 of the NPPF, require development to be well designed and to respond positively to local character. As the proposal is a change of use with little or no external alteration there would be no material change to the external appearance of the building or to the character of the streetscene.
- 4.41 Any external works would be limited to modest bin and cycle stores, sympathetic in design and materials, which would preserve the character and appearance of the area. The proposal would accordingly accord with Policies DM5 and DM16. The full details of these aspects can be secured by planning condition.

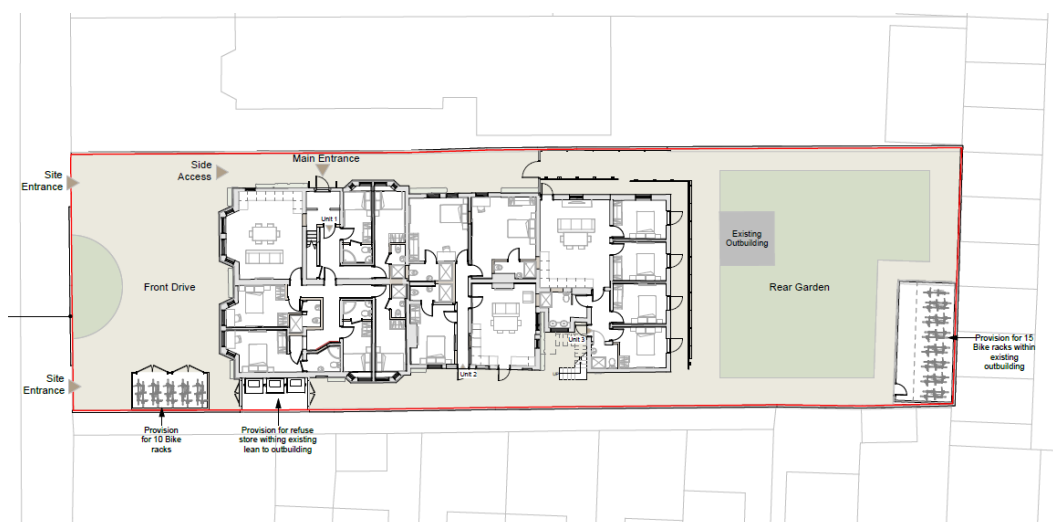
Flood Risk and Drainage

- 4.42 The site lies within Flood Zone 3, with part of the site also at risk of surface water flooding. Both the former care home (Use Class C2) and the proposed HMO fall within the same “more vulnerable” flood-risk vulnerability classification, so the change of use would not increase the vulnerability of the use of the site.

- 4.43 The Flood Risk Assessment demonstrates how the development can be made safe for its lifetime without increasing flood risk elsewhere, having regard to finished floor levels, flood-resistant and resilient construction, safe access and egress, and the provision of flood warning / evacuation arrangements as appropriate. Surface water drainage, including the garden area identified as being at surface water flood risk, will be managed through a sustainable drainage approach informed by the Flood Risk Assessment, consistent with Policy DM20 (flood risk and sustainable drainage). As confirmed by the conclusions of the FRA, the proposal accords with Policy DM20.

Highways, parking and sustainable transport

- 4.44 The site occupies a highly sustainable and accessible location close to the town centre, local services and frequent public transport, in accordance with Policy DM15. Occupiers of HMO accommodation of this kind typically have low levels of car ownership, and the accessible location reduces reliance on the private car. Cycle provision is included on the layout plans and will meet West Sussex Country Council's guidance of 1 cycle space per unit.
- 4.45 The site benefits from a driveway to the front providing off-street parking for approximately five vehicles. Given the highly sustainable location of the site and access to public transport, the proposal is not considered to give rise to an unacceptable impact on highway safety or the operation of the local highway network, and there are no severe residual cumulative impacts of the kind that would justify refusal.



Proposed site plan, with car parking provision available, and refuse and bicycle storage

- 4.46 The likely level of car ownership associated with the proposed HMO should be considered in the context of the characteristics of the accommodation proposed and the established travel characteristics of Worthing residents.

- 4.47 According to the Census 2021, data demonstrated that car ownership within Worthing is appreciably lower than across the wider West Sussex and South East areas. Some 21.84% of households within Worthing have no access to a car or van, compared with 16.00% across West Sussex and 16.86% across the South East. The proportion of car-free households in Worthing is therefore approximately one-third higher than the West Sussex average.
- 4.48 The proposed development would provide individual rented rooms within a shared House in Multiple Occupation rather than conventional family housing. It is reasonable to anticipate that the travel characteristics of future occupiers will therefore differ from those associated with conventional family dwellings, particularly larger owner-occupied houses. The Census 2021 datasets recognise this distinction and separately identify car availability according to household composition and tenure, including "other household types" and privately rented households.
- 4.49 It would not be appropriate to assume that each of the 25 HMO bedrooms would generate a requirement for one car parking space. Such an approach would effectively assume 100% individual car ownership amongst future residents and would take no account of either the nature of HMO accommodation or the established pattern of lower car ownership within Worthing.
- 4.50 The proposal should instead be considered having regard to its sustainable urban location, accessibility to public transport, walking and cycling opportunities and the characteristics of the likely occupiers. The Census evidence provides support for the reasonable proposition that a material proportion of future residents would not own or have access to a private motor vehicle.
- 4.51 Accordingly, the number of bedrooms within the proposed HMO should not be treated as synonymous with the number of vehicles generated by the development. The relevant consideration is whether the parking provision, when considered alongside the site's accessibility and the demonstrated characteristics of local car ownership, would be sufficient to ensure that the development would not result in an unacceptable highway safety or parking impact.

Climate Change

- 4.52 Policy SP2 (climate change) of the WLP requires development to address climate change by reducing the amount of energy used in the operation of buildings and prioritise active travel such as walking, cycling and use of public transport. As described in the introduction, the site is well located to services and public transport that will ensure occupants of the HMO will have significant opportunities to live sustainably. When this is considered with the conversion of a building which will be renovated to modern energy efficiency standards, the

proposal will have a positive impact on addressing climate change in accordance with the principles of Policy SP2.

Affordable Housing

- 4.53 Policy DM3 requires affordable housing on developments with the capacity to provide ten or more self-contained units. As the proposal is for a 25-bed single HMO, the proposal would not trigger an affordable housing requirement under Policy DM3.

Biodiversity

- 4.54 As the proposal involves the re-use of an existing building, impacts on biodiversity would be negligible. The statutory biodiversity net gain requirement is not considered to be engaged by a change of use that does not affect on-site habitat. The proposal is, therefore, subject to the BNG de minimus exemption provisions within the Biodiversity Net Gain Requirements (Exemptions) Regulations 2024.

PLANNING BALANCE AND CONCLUSION

- 5.1 The proposal would deliver housing in a highly sustainable and accessible location within the urban area of Worthing.
- 5.2 The proposal accords with the development plan when read as a whole. It is supported in principle by Policy DM1, which expressly recognise the important role of well-designed HMOs in meeting housing need. It does not engage the resistance to the loss of C3 residential accommodation in Policy DM1 (e), and the loss of the former C2 care home use is acceptable, given that the use has already ceased, and that the Local Plan prioritises housing with care and support over traditional care bed spaces.
- 5.3 The accommodation would provide a very good standard of living conditions for future occupiers, in accordance with the HMO standards and space standards. The proposal would not harm the character of the area or the amenity of neighbouring occupiers. As a change of use, it is not subject to the Sequential or Exception Tests, with flood risk addressed through the accompanying Flood Risk Assessment in accordance with Policy DM20. Highways, parking, refuse and other matters are satisfactorily addressed.
- 5.4 Having regard to section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposal is in accordance with the development plan and there are no material considerations that indicate permission should be withheld. As the proposal accords with the up-to-date development plan, the presumption in

favour of sustainable development in paragraph 11(c) of the Framework applies, and permission should be granted without delay.