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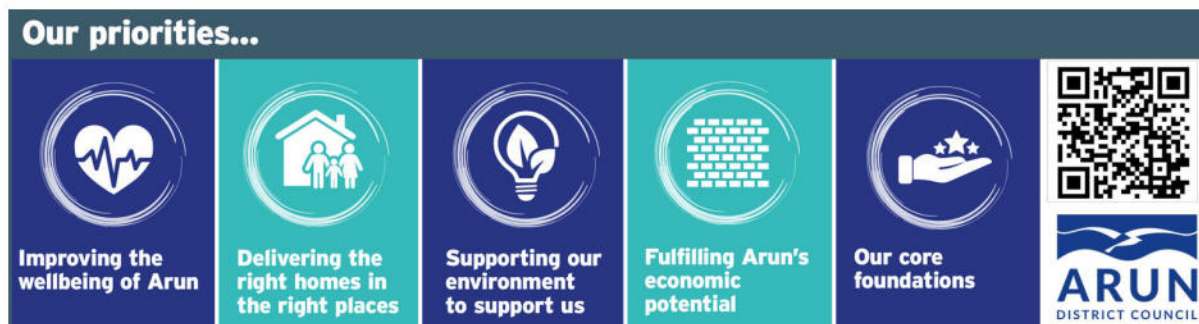
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[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Hebe Smith <Hebe.Smith@arun.gov.uk>
Sent: 04 September 2026 12:40
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: BR/134/26/PL Town Council Representation

Hello,

Please can this be logged as the Bognor Regis Town Council response to BR/134/26/PL.

Thanks,

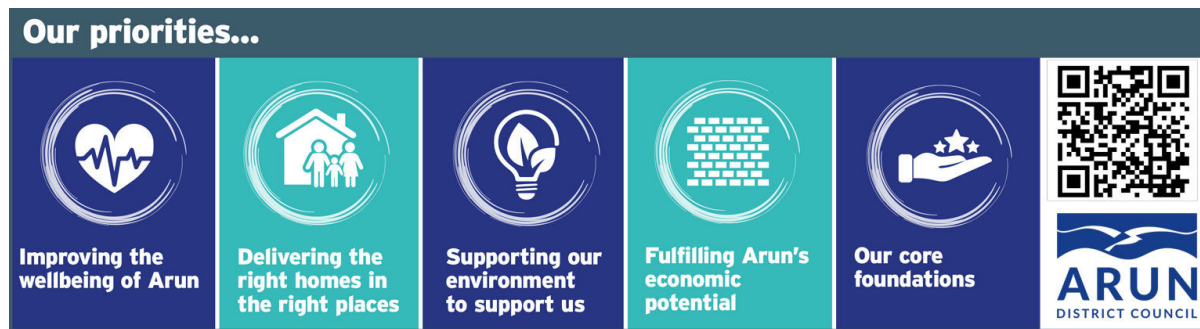
Hebe Smith (she/her)
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From: Max Hirst [REDACTED]
Sent: 04 September 2026 11:24
To: Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: BR/134/26/PL Town Council Representation

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Good afternoon,

Unfortunately, the website seems to be blocking us again from submitting our representations.

Please find below our representation for BR/134/26/PL. **Please could you confirm receipt.**

OBJECTION

Members object to the application for the following reasons:

Overconcentration of Houses in Multiple Occupation and Erosion of Family Housing (Arun Local Plan Policy H SP4(a); National Planning Policy Framework Policy DP3)

Whilst Members acknowledge the need for a range of housing accommodation and recognise that the application site occupies an accessible location close to the railway station, bus services and town-centre facilities, Members consider that the proposal would contribute to an excessive concentration of Houses in Multiple Occupation within this immediate locality.

The applicant's own assessment identifies four existing HMOs within 50 metres of the application site and seven existing HMOs within 100 metres. The proposal would increase those figures to five and eight respectively. Members consider that these figures demonstrate an established and growing cluster of HMOs within a relatively confined area.

Members do not accept that the applicant's reliance upon an alleged 10% concentration threshold is sufficient to demonstrate compliance with Policy H SP4. The adopted policy does not establish a numerical threshold below which an application must automatically be considered acceptable. It requires a qualitative assessment of whether the proposal would erode the balance between different types of housing, including family housing.

Furthermore, the submitted assessment lists broad address ranges and total numbers of residential units but does not identify the addresses of the HMOs counted, their planning or lawful-use status, or the methodology used to establish the figures. Members are therefore unable to determine whether the assessment provides a complete and reliable picture of HMO concentration in the area.

The proposal would remove an existing three-bedroom family dwelling and replace it with accommodation for eight unrelated occupants. In the context of the existing concentration of HMOs, Members consider that this would further narrow the range of household types available locally and erode the remaining stock of family housing.

The proposal is therefore contrary to criterion (a) of Policy H SP4 of the Arun Local Plan and the liveability and mixed-community principles of Policy DP3 of the National Planning Policy Framework.

Parking Demand and Highway Impact (Arun Local Plan Policies H SP4(b) and T SP1; National Planning Policy Framework Policies TR4 and TR6)

The proposed eight-bedroom HMO would provide no off-street car parking.

West Sussex County Council's Guidance on Parking at New Developments indicates that provision of 0.5 parking spaces per bedroom should be considered appropriate for Houses in Multiple Occupation. On this basis, the proposal would generate an indicative requirement for four parking spaces, against which no provision is proposed.

Members acknowledge the proximity of the site to public transport. However, accessibility alone does not demonstrate that none of the eight occupants, their visitors or service providers would require a vehicle. The applicant's statement that occupants would be advised that parking is limited and encouraged to use cycles and public transport is neither binding nor enforceable and does not amount to an effective travel plan or car-free management arrangement.

No parking-capacity survey, site-specific car-ownership evidence, transport statement or assessment of cumulative parking demand has been submitted. Consequently, the application has not demonstrated that the likely displaced demand could be accommodated without increasing pressure on surrounding streets.

The application frontage is subject to double-yellow waiting restrictions and Longford Road is a busy route used by buses and other large vehicles. Members are concerned that additional displaced parking would increase competition for the limited spaces in adjoining roads and could encourage inappropriate parking, obstruction of pedestrian routes and interference with the safe and efficient passage of traffic.

Members are aware of the appeal decision relating to the nine-person HMO at 10 Longford Road. However, that proposal involved the enlargement of an existing six-person HMO and the resulting permission was expressly conditional upon the provision and retention of two on-site parking spaces. The present application would create an entirely new large HMO from a family dwelling while providing no parking at all. Members therefore consider that the circumstances are materially distinguishable.

The proposal has not demonstrated that it would avoid generating excessive parking demand or traffic and is therefore contrary to Policies H SP4(b) and T SP1 of the Arun Local Plan and Policies TR4 and TR6 of the National Planning Policy Framework.

Overdevelopment and Inadequate Usable Open Space (Arun Local Plan Policies H SP4(c), D DM1 and D DM4; National Planning Policy Framework Policy DP3)

Members consider that the conversion of this modest mid-terraced property into an eight-bedroom HMO, facilitated by a 7.5-metre rear extension and substantial rear dormer, represents an excessive intensity of development for the constrained plot.

The applicant acknowledges that the claimed 53 square metres of external amenity space and garden depth of 7.3 metres fall below the Council's respective targets of 70 square metres and 10.5 metres. Moreover, a material proportion of the claimed area comprises the narrow 1.61-metre-wide passage alongside the rear extension rather than readily usable communal garden space.

The remaining rear garden must also accommodate covered storage for eight bicycles, associated access, communal seating and planting. Members therefore consider that the amount of genuinely usable and unconstrained outdoor amenity space would be appreciably less than the headline figure stated by the applicant and would be inadequate for eight independent occupiers.

The proximity of public open spaces does not overcome the requirement within Policy H SP4(c) for the development itself to provide an adequate area of open space.

The proposal would therefore constitute an overdevelopment of the site and would fail to provide adequate, functional and good-quality outdoor amenity space for its intended level of occupation. It is consequently contrary to Policies H SP4(c), D DM1 and D DM4 of the Arun Local Plan and the liveability and design principles of Policy DP3 of the National Planning Policy Framework.

Members also note that one of the public representations states that works at the property are already under way. Members request that the Local Planning Authority investigate whether any works requiring planning permission have commenced before this application has been determined and take any action considered appropriate. Members recognise that the reported commencement of works is a separate enforcement matter and do not rely upon it as an additional reason for refusal.

Members further request that, should the Local Planning Authority nevertheless be minded to grant permission, the maximum occupation be restricted to eight persons and the acoustic protection scheme recommended by Environmental Health be secured and implemented before the HMO use commences.

Kind regards,

Max Hirst

Deputy Clerk



Bognor Regis Town Council, Town Hall, Clarence Road, Bognor Regis, PO21 1LD

Town Council Office Hours: 9.00am-5.30pm Monday-Thursday, 9.00am-5.00pm Friday

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