

Amber Willard

From: Gail Pilkington [REDACTED]
Sent: 05 June 2019 14:20
To: Amber Willard
Cc: Planning; Thanaluxmi Thirukkumar [REDACTED]
Subject: BR/107/19/PL 32 Argyle Road, Bognor Regis - Change of use to HMO
Attachments: Appeal decision LU11117PL 19 Bayford Road 6th June 2018.pdf; 32 Argyle Rd.As Exg Floor Plans.pdf; 32 Argyle Rd.As Exg Cross-Sections.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Amber,

Further to our telephone conversation last week I am emailing in response to the Bognor Regis Town Council objections published on the website regarding this application. Taking the points raised in turn:

- 1) Concern is raised that this application would adversely affect the character of the area and tip the balance between different types of housing in that the HMO replaces a previous family home.

Response: In terms of character there are no changes proposed to the external appearance of this building and therefore, it is only relevant to consider the impact of the use of the building as a HMO on the established character of the area. It is noted that the area is mixed with residential properties to the north and commercial properties mainly to the south. The residential nature of the area includes evidence of some houses subdivided into flats and bedsit units and it is not considered that a new multiple occupancy dwelling would be out of character in this mixed locality. Whilst the property was previously a family house, to our knowledge, there is no available evidence that this additional property is eroding the balance between different types of housing, including family housing in the area policy H SP4 (a).

The HMO licence has now been received and this requires the number of bedrooms to be limited to 4 with the provision of a shared living space for use by all occupants. Therefore one of the ground floor rooms previously identified as bedroom 3 is now allocated as a sitting/dining room. The proposal therefore is now for a 4 bedroom 8 person HMO as shown on the attached substitute plans 201903.Exg 02, and 201903.Exg 04.

In terms of the design and amenity considerations contained in D DM1 and D SP1, in an appeal decision APP/C3810/W/18/193887 at 19 Bayford Road Littlehampton (allowed and issued on the 6th of June 2018 – copy attached), the Inspector stated that occupiers of HMO are likely to have similar ‘comings and goings’ when compared to those of a large family. Subject to licencing, the existing building at 32 Argyle Road could be used as a 5 bedroom HMO with maximum occupancy of 6 persons as permitted development under the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

The licence has now been received for the use of the property as a 4 bedroom HMO up to 8 people with each room to be used by a couple or related persons. The current use is by 4 couples who all work in the same horticultural industry in the locality and therefore their ability to reside and work in the locality is of benefit to the local economy.

We consider the proposed use will have minimal increase in the level of activity compared with the permitted use as a family home or as a 4 or 5 bedroom 6 person HMO.

- 2) Concern that one car space is insufficient.

Response: It is fair to comment that existing car ownership is not necessarily indicative of future car ownership however we repeat our opinion that the accommodation, by its nature, provides a valuable contribution to the provision of low cost accommodation in a central sustainable in the town for people on low incomes. It is widely recognised in planning that accommodation for people on low incomes results in low car ownership and therefore by its nature, the accommodation will attract people who are less likely to own a car. Notwithstanding this, our original planning statement points out alternative nearby public car parks that are available for residents and visitors.

The current occupiers' day to day transport needs are met by their employer who provides a minibus each day from arranged pick up points to their place of employment. Their leisure transport needs are met by public transport in this highly sustainable location. We do not consider that the lack of parking could be sustained on appeal and would point to the appeal decision APP/C3810/W/18/193887 (copy attached) where a 7 bedroom HMO was permitted in a central location in Littlehampton with no parking provision.

3) Concern that there is insufficient open space for 8 residents.

Response: With regards to policy H SP4(c) of Arun Local Plan, this requires that proposals provide adequate areas of open space. However whilst there are no plan policies covering external amenity space or gardens, the proposal benefits from a small outside area (around 4m by 3m) where residents are able to sit outside. This type of open space is less suitable for a family garden and the amount of open space available is not dissimilar to that enjoyed by the immediately adjoining properties in Argyle Road to the north. This can be confirmed from the block plan submitted with the application.

Furthermore, the site is located within only a short walk of the seafront and numerous public gardens and leisure opportunities including Waterloo Square and Hothampton Gardens. It is considered therefore that residents are able to easily access outdoor amenity and leisure space. It is therefore considered that the proposal complies with policy H SP4 of the Arun Local Plan and with the guidance on character and traffic within the NPPF.

4) Concern is raised regarding refuse storage.

Response: Since submission of this application, full provision for refuse has been allocated and provided in accordance with the HMO licence. There is now; 1 x 240 litre recycling bin and 3 x 240 litre general waste bins located at the rear of the garage and screened from the neighbour by a 1.8m high fence. All bins are lidded wheelie bins and there is no reason to suggest that this arrangement would give rise to health hazards.

Conclusion

We consider that some of the concerns of the Town Council are understandable but unfounded. Many of the practical matters they have raised have already been dealt with under the HMO licencing regime and as a result some amendments have been made (to the internal layout and the refuse facilities for example).

The property provides much needed low cost accommodation in a central and sustainable location and we are not aware of any objections from neighbouring residents on amenity grounds.

As referred to above, we submit substitute layout plans and trust that the application will be supported. We look forward to hearing whether the decision on this application will be taken under delegated powers or made at the next available committee.

Kind regards
Gail