

PLANNING STATEMENT

Clifton Road – Change of use (regularisation and part retrospective) to Sui Generis HMO & C3 Residential

Site: No.27 Clifton Road, Littlehampton, BN17 5TE

Date: February 2022



CMK
PLANNING



RTPI

Chartered Town Planner

Executive summary

This application is for a proposed Change of Use of No27 Clifton Road and results in a 20no bedroom sui generis HMO with associated site management office. It also proposes 2no separate 1B1P self-contained C3 units.

Currently the FF is being used as an 11no bed HMO which does not benefit from planning permission and this proposal seeks to regularise the use. There is also currently a GF C3 unit. The scheme will result in improved facilities for the existing units.

H SP4 states that HMO applications will be favourably considered: *'The contribution of HMOs to the economy is recognised, particularly as a source of housing for people on low incomes, those on benefit payments, students and those starting off in the economy as young professionals'*. Thus, there is universal agreement from the outset that an HMO at this site is supported in principle.

Significant weight must also be given to the current housing land supply shortfall (2.4 yrs HLS).

The proposal is wholly in keeping with the largely residential nature of the immediate neighbourhood. There are multiple HMOs nearby, though the proportion of the total properties is only 4%. The floorspace of the site means that the resulting housing intensity will be compatible with the existing residential surroundings.

There will be no impact on neighbouring amenity. No major alterations to the exterior are proposed and there are no FF windows facing the rear of the properties on New Road. The unit would be appropriately managed and a management plan has been presented as part of this application.

The applicants are highly experienced HMO managers and the quality of the development and its future management is assured. All rooms will be compliant with the relevant amenity standards.

The location is highly sustainable being in close proximity to Littlehampton town centre (2-minutes walk), the train station (6 minutes) and seafront (7 minutes). Occupants will benefit from excellent access to public transport, community facilities and employment opportunities. There is no inherent requirement for occupants to have regular use of a private petrol vehicle.

Given all the above, we respectfully request that this application be approved without delay.

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1 Introduction

- 1.1 This application relates to No.27 Clifton Road, Littlehampton, BN17 5TE.
- 1.2 The application proposes a change of use to establish the site as a 20no room HMO incorporating both the GF & FF.
- 1.3 The FF is currently a licensed 11no bed HMO. This application seeks to regularise the planning use.
- 1.4 The existing HMO will be subject to numerous improvements including the addition of a staffed site management office, introducing ensuite facilities for all HMO rooms and updating the communal kitchen/dining areas on the GF & FF.
- 1.5 The site also benefits from a communal FF terrace area whose use will be regulated.
- 1.6 The proposal also results in 2no 1B1P self-contained C3 units (therefore a net increase of 1, as there is an existing C3 unit).
- 1.7 Section 2 below details the relevant local & national policy in relation to and in support of the proposed HMO at this site.
- 1.8 Section 3 documents the residential nature of the area around the proposal site which includes a number of recently approved HMOs.
- 1.9 Section 5 presents the details of the proposal including the numerous improvements to the existing HMO.
- 1.10 Sections 6 presents the assessment of the proposal, including that:
- Local policy is supportive of HMOs;
 - The absence of a 5YHLS for Arun DC gives great weight to the provision of housing;
 - The location is highly sustainable and appropriate for development;
 - There is no anticipated impact on neighbouring amenity or visual amenity.
- 1.11 The statement culminates with Section 7 which concludes that there is ample justification for the approval of this application.

2 Relevant policy

- 2.1 The following local & national policies are considered relevant to the assessment of this application.

Arun Local Plan 2011-2031

- 2.2 The following development plan policies from the Arun Local Plan (July 2018) are relevant to this application:

- SD SP1 - Sustainable development;
- SD SP2 – Built-up area boundary (defining where development should be focussed);
- EMP SP1 – Strategic economic growth;
- EMP SP2 - Economic growth areas;
- H DM1 – Housing mix;
- H DM2 - Independent living;
- H SP1 - Housing requirement;
- H SP4 - Houses in multiple occupation;
- D SP1 - Design;
- D DM1 – Aspects of form and design quality;
- D DM2 – Internal space standards;
- D DM4 – Extensions & alterations to existing buildings (residential and non-res.);
- T SP1 - transport and development;
- T DM1 – Sustainable travel;
- HER DM2 - Locally listed buildings or structures of character;
- W DM2 – Flood risk.

Littlehampton Neighbourhood Plan 2014-2029

- 2.3 The following development plan policies from the Littlehampton Neighbourhood Plan (November 2014) are relevant to this application:

- 1 - The presumption in favour of sustainable development;
- 3 - Housing supply;
- 17 - Buildings and structures of character;
- 22 - Design of new development.

National Planning Policy Framework (NPPF)

- 2.4 Within the NPPF (July 2021) as-a-whole the following paragraphs are of particular relevance to this application:

- 8 a) (Overarching objectives - building a responsive and competitive economy);
- 8 b) (Overarching objectives - meeting present social needs & supporting well-being);
- 9 (Flexibility - taking account of circumstances);
- 11 d) (Presumption in favour of sustainable development where policies are 'out of date');
- Footnote 8 (including in the absence of a 5-year land supply);
- 12 (Status of development plan);
- 38 (Decision-making - proactive support for developers);
- 47 (Determining applications - taking account of material considerations);
- 60 (Government objective to significantly boost housing supply);
- 69 (Important contribution of small & medium sites);
- 69 c) (Benefits of windfall sites within settlements);
- 81 (Building a strong, competitive economy);
- 117 (Making effective use of land to supply homes);
- 119 (Effective use of land for homes);
- 120 d) (Optimising use of land where housing land supply is constrained);
- 124 (Efficient use of land - meeting identified needs for different types of housing);
- 125 (Optimal use of each site);
- 130 e) (Optimising the potential of each site);
- 130 f) (High standard of amenity for occupants).

Supplementary planning documents & local design guidance

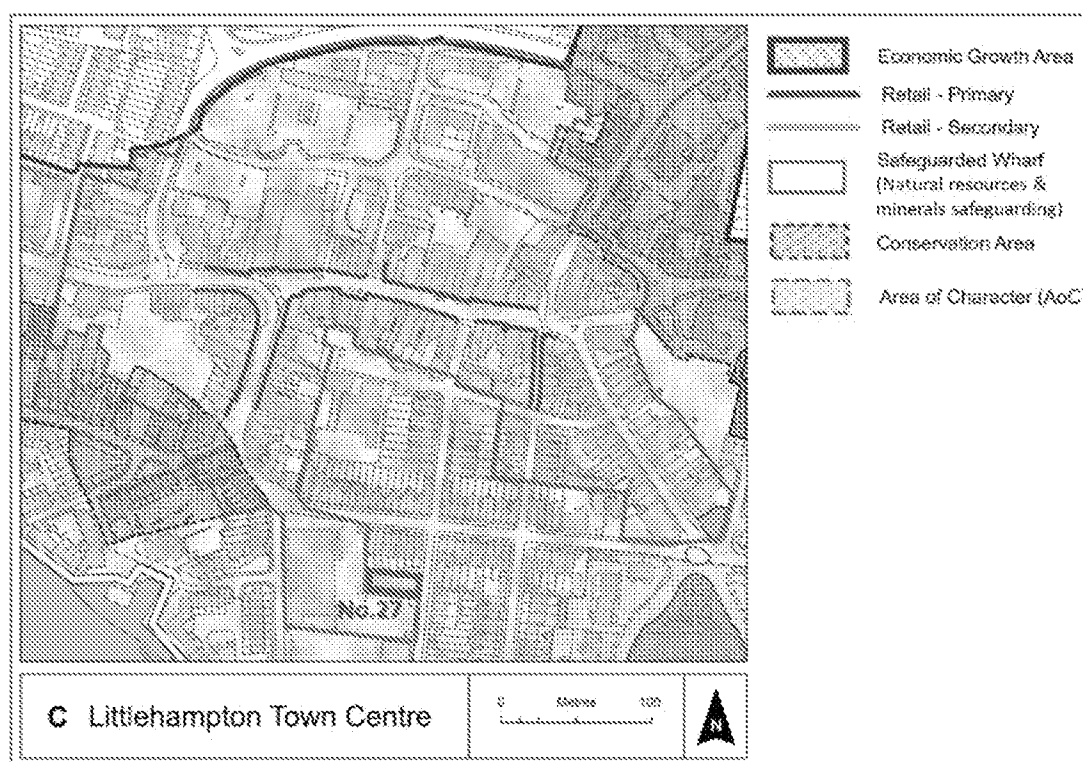
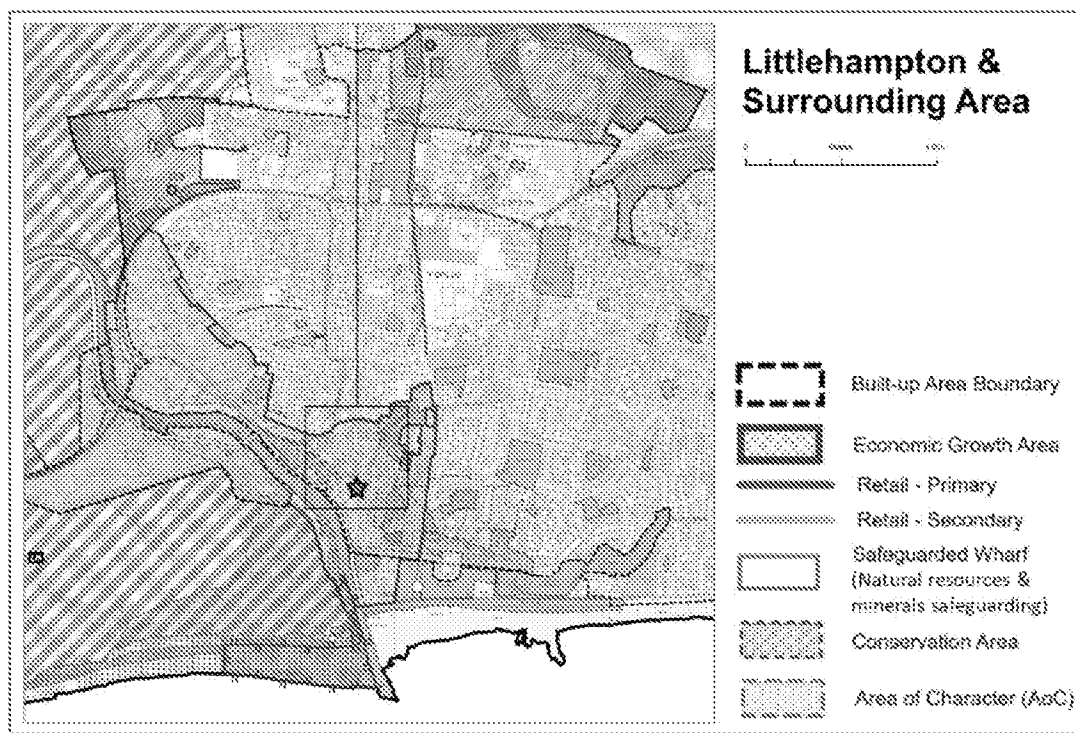
- 2.5 Within this context we note NPPF Paragraph 134 a) which states that significant weight should be given to *'development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*.
- 2.6 The following SPDs from the Arun DC Local Development Framework are relevant to this application:
- Parking Standards SPD (January 2020);

3 Site context

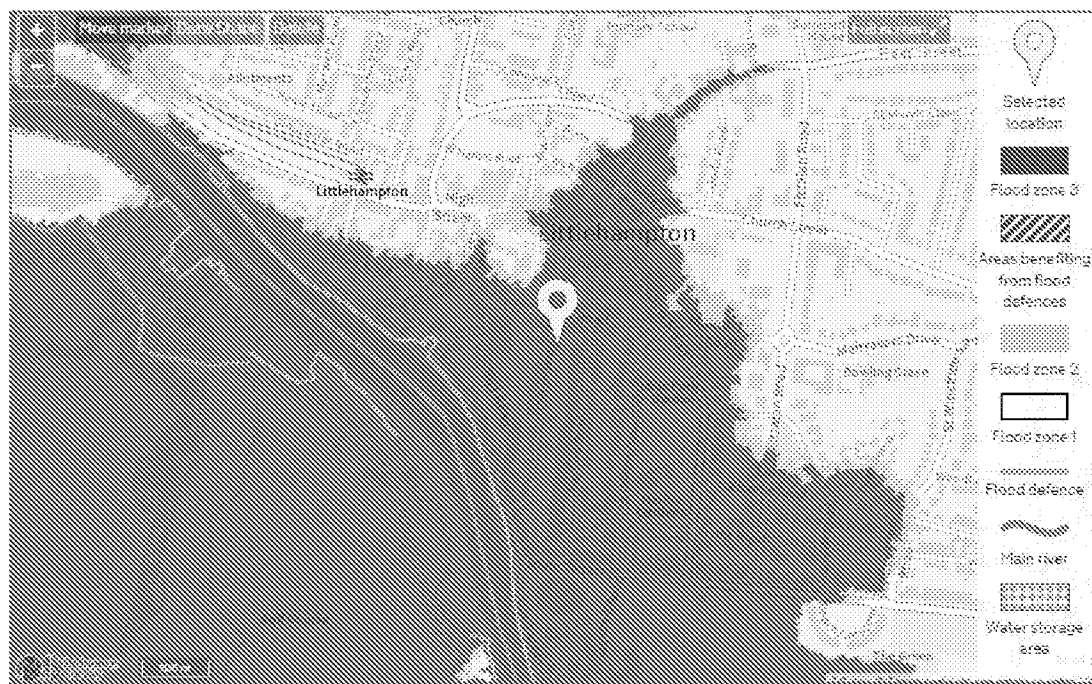
- 3.1 The proposal site is within an area of mixed residential and commercial use in close proximity to the town centre. The Littlehampton town centre secondary retail zone lies immediately west of the site whilst the area to the north and east of the site is predominantly residential.
- 3.2 From a policy perspective, the site is within the Littlehampton Economic Growth Area and more within the Built-up Area Boundary (where development will generally in principle be supported).
- 3.3 The site is located on the western side of north-south trending Clifton Road, just south of the junction with east-west trending New Road.
- 3.4 The properties around the New Road junction, adjacent to and opposing the proposal site, are terraced and of residential character with principal elevations fronting directly onto the street. The north side elevation of the proposal building faces the rear elevations of properties on New Street.
- 3.5 Immediately south of the proposal site the character of Clifton Road changes, comprising the rear of commercial premises (on the western side) and residential backland (on the eastern side).
- 3.6 The western and southern elevations of the proposal building are flanked by a supermarket car park (accessed via New Road) and screened by fencing.
- 3.7 A mixture of tenures and housing types are present in the wider surrounding residential area. There are some HMOs.
- 3.8 The proposal property itself comprises a medium-sized, semi-detached, 2-storey building, with red brick exterior and a pitched roof - gabled at the front elevation and finished with slate tiles.
- 3.9 The building largely fills the plot apart from a driveway area opening onto Clifton Road.
- 3.10 A FF terraced area is accessed via steps from the driveway. The internal FF can be accessed via the terrace.
- 3.11 The GF currently functions as a 1-bed C3 unit and garage/storage area.

- 3.12 The FF currently functions as a licenced 11no room HMO which does not currently benefit from planning permission. (See existing site plans below in Section 5).
- 3.13 The HMO has a shared kitchen area and a number of shared bathrooms. Some HMO rooms have private ensuite facilities.
- 3.14 The site is not in a Conservation Area or in an Area of Character.
- 3.15 The property is not Listed or a local Building of Special Interest.
- 3.16 The site is in Flood zone 3, in common with much of Littlehampton's town centre, riverside and seafront areas. (See flood zones map below).









4 Planning history

- 4.1 There is no relevant planning history for the site.
- 4.2 The FF site has operated as a licenced 11no bedroom HMO since 2017 and this continues to be the current use of the FF.
- 4.3 Planning permission has not yet been sought for use of the FF as an HMO - this application seeks to regularise the situation and incorporate the GF as a large / sui generis HMO.
- 4.4 This application is therefore part retrospective.

5 Description of the proposal

- 5.1 The proposal comprises change of use / regularisation of use for the site as a large/sui generis HMO and associated alterations relating to improvement of the facilities and extension of the HMO within the GF.
- 5.2 The proposal retains and improves the existing GF self-contained C3 unit and also creates a new FF self-contained C3 unit.
- 5.3 See diagrams below which present the proposed floor plans for the GF & FF alongside the existing floor plans for comparison. The existing vs proposed elevations are also presented.

Large / sui generis HMO

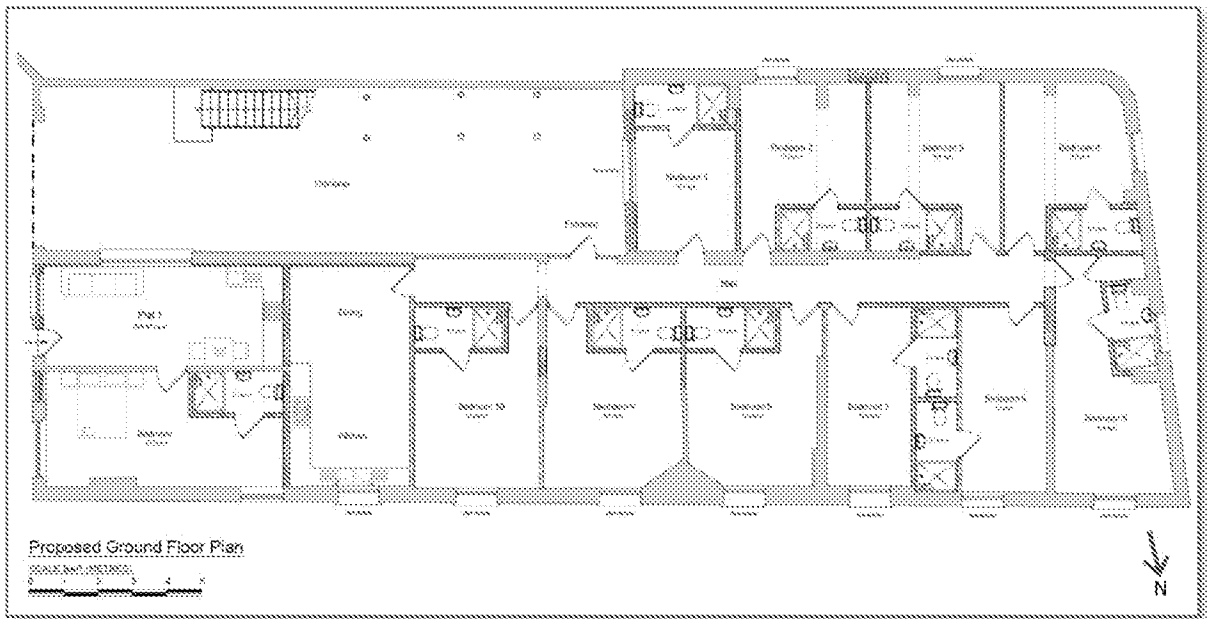
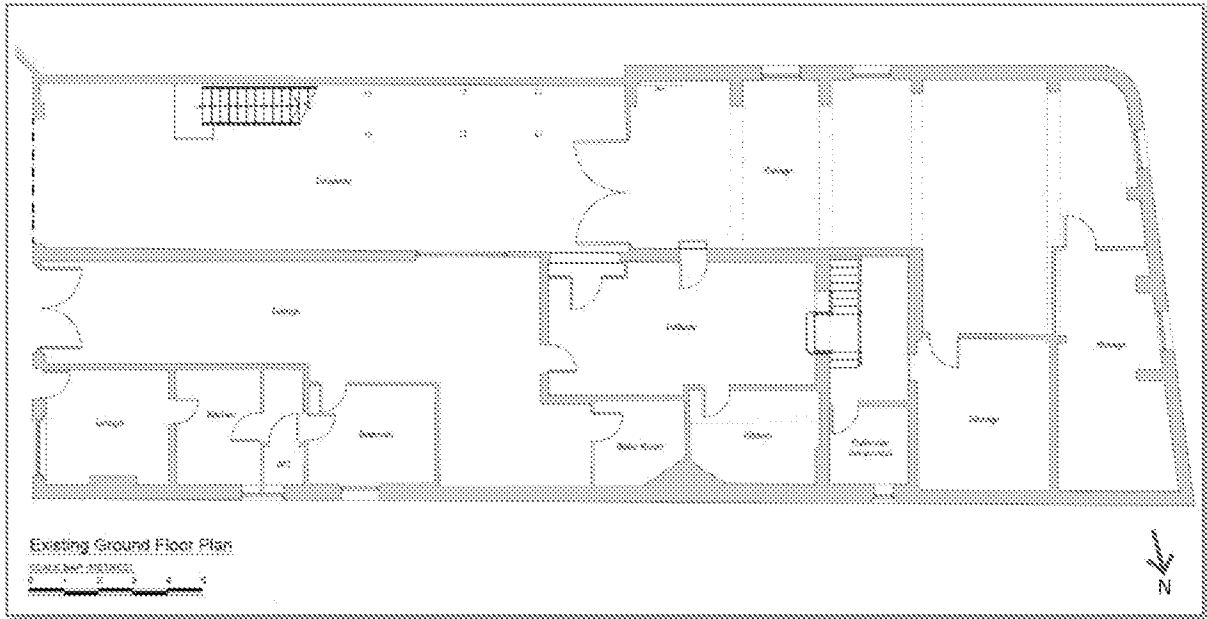
- 5.4 The proposal reconfigures the FF to create an improved HMO unit. It also reconfigures the GF to form a second (lower) floor to the HMO.
- 5.5 The proposal results in a 20no room HMO, with 10no rooms on the GF and 10no rooms on the FF.
- 5.6 Each HMO room will:
 - Have private ensuite facilities
 - Have at least one exterior window
- 5.7 The proposal introduces a site management / concierge office. A Site Management Statement has been submitted with the application. This details the duties that shall be performed by the concierge - these include duties relating to safety, security, regulation of antisocial behaviour, and relations with neighbours and the wider local community.
- 5.8 The proposal includes an equivalent communal kitchen & dining area on the GF.
- 5.9 The existing communal FF terrace area is retained - use of this area shall be regulated by the site manager/concierge.

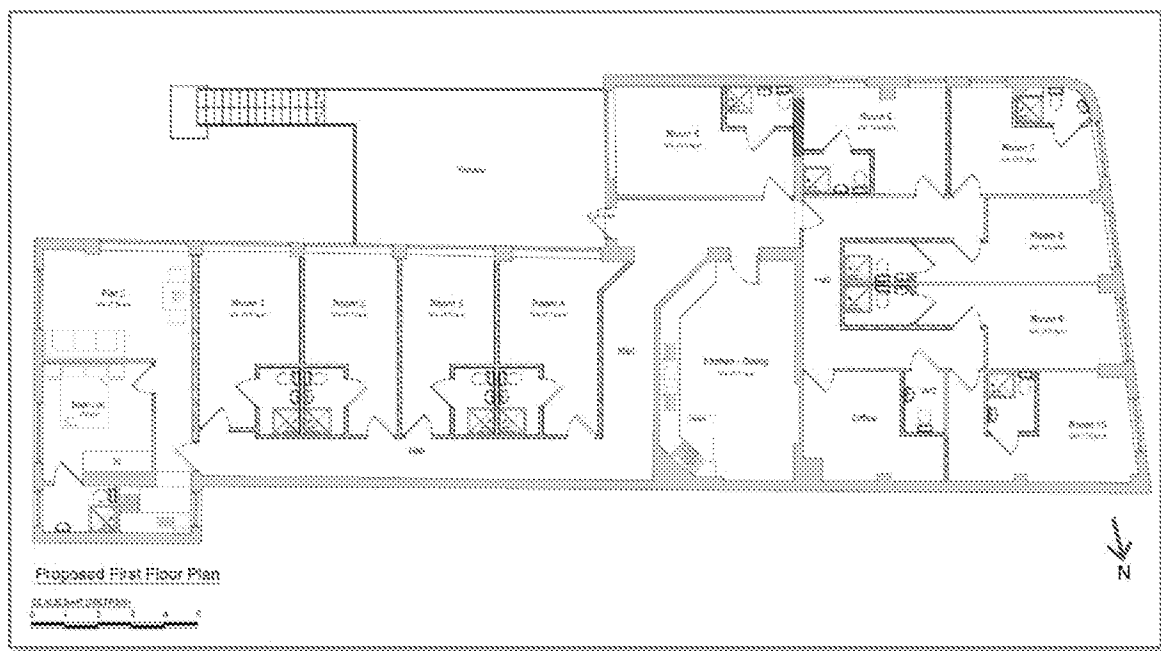
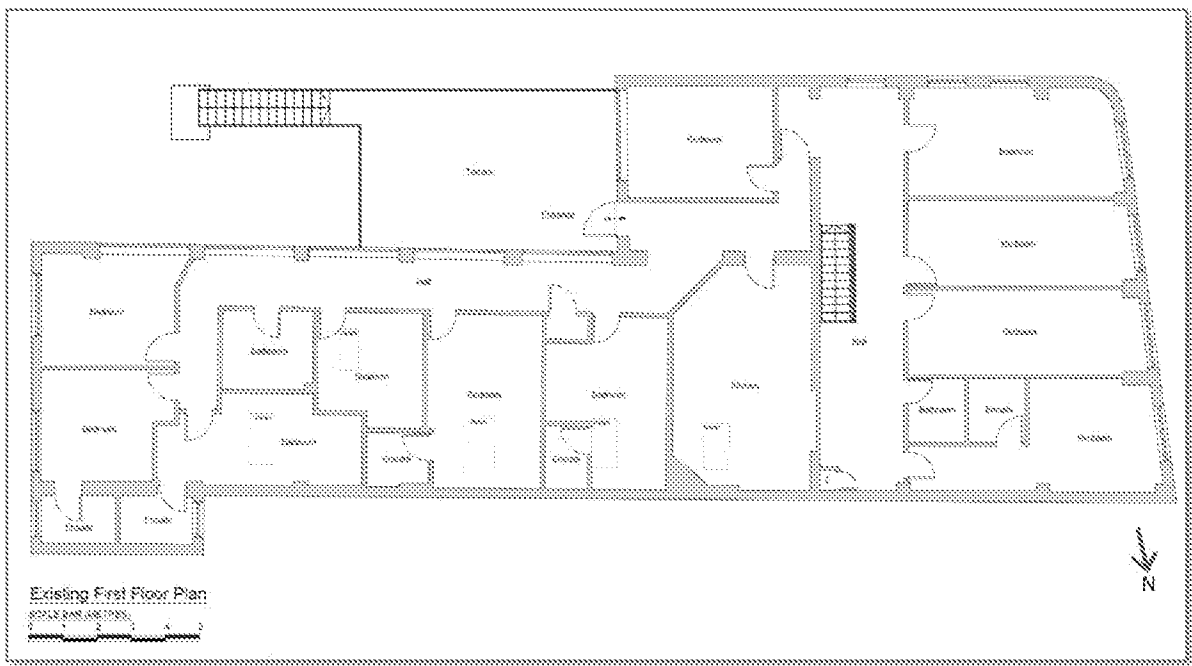
Self-contained C3 units

- 5.10 The existing C3 unit at the eastern end of the GF is reconfigured. The proposal results in this being a self-contained 1B1P C3 unit. New south-facing and east-facing windows are added whilst the existing north facing window is retained.
- 5.11 The proposed reconfiguration of the FF creates a new self-contained 1B1P C3 unit at the eastern end of the FF.
- 5.12 Both of the C3 units will be NDSS compliant

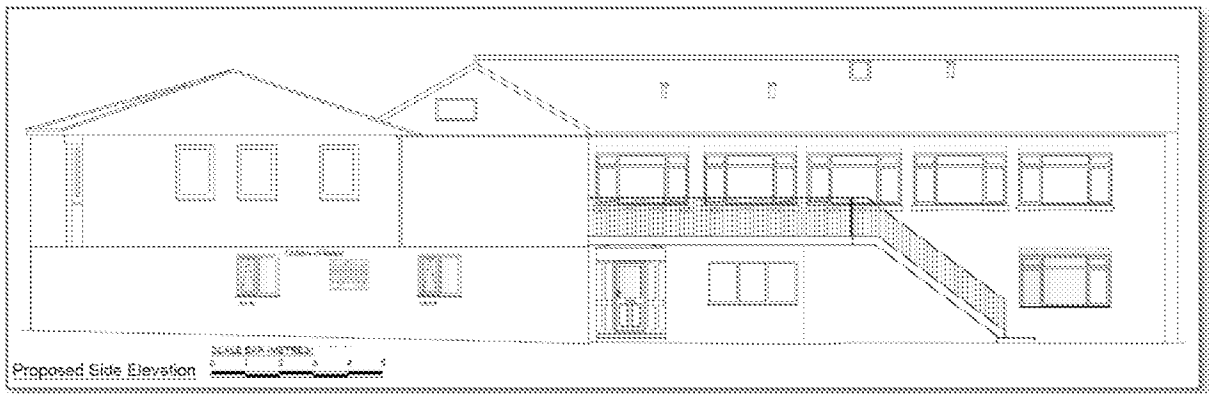
Building exterior

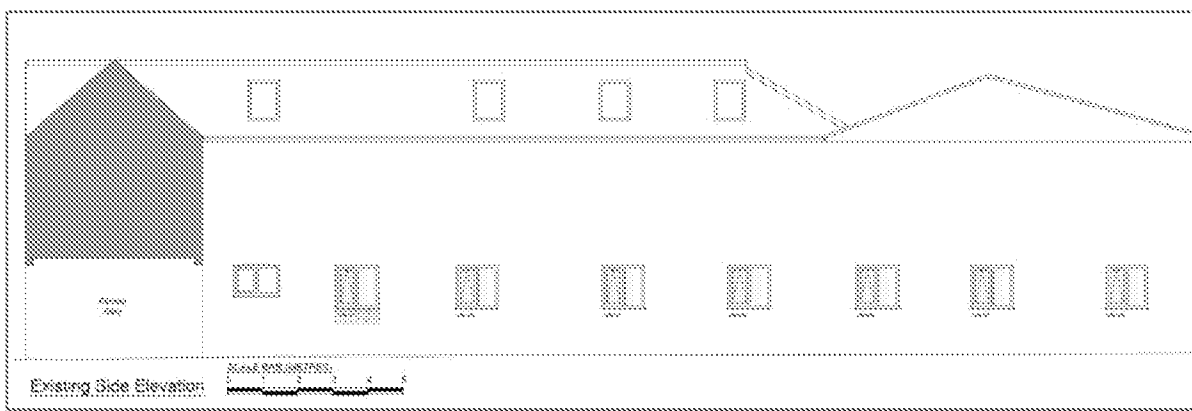
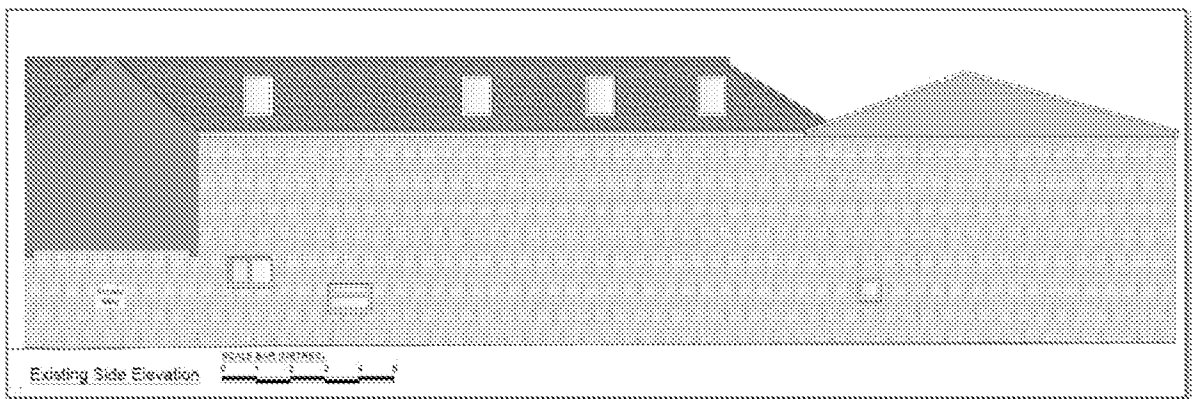
- 5.13 Only minor changes are proposed for the building exterior, relating to improved amenity for occupants and enhanced residential character & function of the property.











6 Assessment of proposal

Planning considerations

6.1 In this instance the main planning considerations are:

- Principle of development (change of use/addition of an HMO at this location);
- Visual impact on the street scene;
- Standard of accommodation for occupants;
- Impact on neighbouring amenity;
- Sustainable transport;
- Sustainability of the location;
- Additional considerations (flooding;).

6.2 The site is not a Listed Building and is not in a Conservation Area.

6.3 There are no applicable Article 4s.

Principle of development

6.4 The overall scheme proposes the creation/regularisation of multiple new residential units which optimises the use of the existing property at a highly sustainable brownfield location, adjoining to a predominantly residential area – serving to appropriately meet housing demand at a time of housing land supply shortfall and the resulting overriding presumption in favour of sustainable development.

6.5 Thus, there is strong justification and good general support for the principle of the proposal (HMO and C3 units) within the current local development context.

Change of use / regularisation to Sui Generis Large HMO

6.6 The relevant policy in the local plan for the HMO element of the proposal is H SP4 - Houses in Multiple Occupation. H SP4 states that HMO applications will be favourably considered where they meet the relevant criteria (see below) - we shall demonstrate below that this application is fully compliant with these criteria.

6.7 The supporting text of H SP4 states that:

'The contribution of HMOs to the economy is recognised, particularly as a source of housing for people on low incomes, those on benefit payments, students and those starting off in the economy as young professionals.'

6.8 Thus, the benefits of the proposal are established from the outset, especially given the central location of the proposal site and the residential nature of the location.

6.9 The HMO element of the application can be assessed against H SP4 as follows:

'Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where the proposals contribute to the creation of sustainable, inclusive and mixed communities and meet the following criteria:

a. Do not adversely affect the character of the area including eroding the balance between different types of housing, including family housing;'

6.10 There are approximately 101no properties within a 100 m radius of the proposal site. To our knowledge, 4no of these properties are registered HMOs. Thus, HMOs represent approximately 4% of the total properties within 100 m of the site.

6.11 There are no registered HMOs on Clifton Road itself. The buildings on Clifton Road are numbered up to No.72 which indicates that the proposed HMO would represent less than 2% of the road.

6.12 H SP4 does not define a spatial concentration threshold for HMOs but, regardless, 2% or 4% cannot represent an over-concentration of HMOs in the area.

6.13 Regardless, an elevated concentration of HMOs is not an issue in principle provided they provide a high quality of accommodation and are well-managed (as will be the case with this proposal - it should be noted that the applicants are very experienced HMO managers and have excellent working relations with local councils – see also the appended Management Statement).

6.14 The predominant character of the area is residential which accords with both the HMO and the C3 elements of this proposal.

6.15 The existing mix of housing in the area includes family houses and buildings that are divided into flats. The proposal maintains the existing mix of housing in the area and does not result in the loss of an existing family unit.

- 6.16 Thus, the proposed HMO does not adversely affect the character of the area and accords with the intentions of H SP4 a. and the aspiration for mixed and balanced communities.

'b. Do not contribute to the generation of excessive parking demands or traffic in an area;'

- 6.17 The site is highly sustainable with excellent access to sustainable public transport. The location is very central and situated immediately outside the town centre retail zone. There is, therefore, no inherent requirement for occupants to require ongoing use of a private petrol-driven vehicle for access to employment opportunities or community facilities.

- 6.18 Further, local on-street parking is well regulated with comprehensive parking restrictions in the immediate vicinity.

- 6.19 Thus, the proposal does not contribute to the generation of excessive parking demands or traffic and highway safety will not be detrimentally affected.

'c. Provide adequate areas of open space.'

- 6.20 The location has excellent proximity & access to the seafront, riverfront and public parks.

- 6.21 Further, occupants will have use of the FF communal terrace area.

- 6.22 Occupants will therefore have more than adequate access to open space. This is discussed more fully below.

- 6.23 It is also noted that HMOs are considered to provide additional accommodation for working age people which thereby increases footfall and economic investment within the town centre in line with the aspirations of EMP SP2 (Economic Growth Areas).

- 6.24 Given the above, is demonstrated that the proposal is fully compliant with H SP4.

Self-contained C3 units

- 6.25 The proposal results in 2no self-contained 1B1P C3 units, in addition to the HMO.
- 6.26 One of the key objectives of the NPPF is to support the delivery of sustainable housing.
- 6.27 Further, Section 5 of the NPPF (2021) identifies a key Government objective is to significantly boost the supply of homes (Paragraph 60).
- 6.28 Paragraph 11 of the NPPF states that decision-makers should apply a presumption in favour of sustainable development.
- 6.29 Paragraph 11 d), in particular, identifies that planning permission should be granted:

'Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date'.

(Unless 'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in (the NPPF) taken as a whole').

- 6.30 Attention is drawn to the above paragraph, which places a duty on the planning authority to give increased weight to housing delivery when determining applications where local policies are out of date. Footnote 8 of 11 d) clarifies that:

'This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites'

- 6.31 The Council had declared a 2.42 year HLS in their 2020/21 AMR (January 2022).
- 6.32 Thus, as the Council is currently unable to demonstrate a 5YHLS, the local plan is as matter of fact 'out-of-date'. Therefore, significant weight must be given to housing delivery when considering the planning balance in the determination of planning applications.
- 6.33 Regardless of the current HLS position, there is ample local policy support for the proposed C3 units at this sustainable, central, residential, brownfield location.
- 6.34 SD SP1 (Sustainable Development) states that:

'When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National

*Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that **proposals can be approved wherever possible.***

6.35 Arun Local Plan 12.1 - housing allocations states that:

*'Arun's Local Plan strategic objective for Housing Delivery is to: "Plan and deliver a range of housing mix and types in **locations with good access to employment, services and facilities** to meet the District's housing requirements and the needs of Arun's residents and communities...ensuring that issues of affordability...are addressed while supporting the creation of integrated communities."*

6.36 The site is located within the built-up area boundary where residential development is considered acceptable in principle subject to detailed design. SD SP2 (Built-up Area Boundary) states:

'Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.'

6.37 The supporting text to SD SP1a (Strategic Approach) states that:

'The effective use of previously developed land will be encouraged'.

6.38 D SP1 (Design) states that:

'All development proposals should seek to make efficient use of land but reflect the characteristics of the site'.

6.39 The provision of additional housing clearly support the objectives of H SP1 - Housing Requirement and will contribute towards meeting the council's overall housing need.

6.40 The combination of HMO and C3 units in this proposal is clearly aligned with the intentions of H DM1 - Housing Mix.

6.41 Given the above, there is evidently overwhelming local and national policy support for the provision of the proposed C3 units.

Visual impact on the street scene

6.42 There is no detrimental visual impact on the street scene due to the nature of the scheme.

6.43 The proposed changes to the exterior are very minor and will only serve to enhance the residential appearance of the building - this will accord well with the neighbouring residential properties.

Standard of accommodation for occupants

- 6.44 The scheme will generate well fitted HMO rooms & C3 units that comply with all relevant national and local standards in a desirable location close to the town centre.

Internal amenity – HMO

- 6.45 As per the schedule of rooms (Section 5 above), all of the HMO bedrooms will exceed the required HMO bedroom floorspace.
- 6.46 All of the HMO bedrooms will have private ensuite facilities.
- 6.47 Each HMO bedroom will have at least 1no window providing ample daylight, outlook and ventilation. A number of the rooms have 2no windows.
- 6.48 All occupants will have access to well-furnished communal kitchen & dining areas (present on each floor).

Internal amenity - self-contained C3 units

- 6.49 The 2no C3 units are both comfortably-sized and meet the NDSS requirement of 37 m² for a 1B1P unit with shower room.
- 6.50 The units benefit from ensuite facilities, newly fitted kitchen areas and storage cupboards.
- 6.51 The units have windows facing in multiple directions providing a high standard of natural light, outlook and ventilation.

External amenity

- 6.52 All occupants will have use of the communal terrace area which will be regulated by the site office manager/concierge.
- 6.53 The property lacks a GF garden area, in common with many HMO-type properties
- 6.54 However, it is recognised that all Littlehampton residents have excellent access to nearby outdoor amenity areas, including the seafront, riverfront, beach, West Beach, public parks, play areas, sports facilities, shops, restaurants, library, museum and amusements.

6.55 The site is just 100 m from the town centre retail zone, 150 m from the riverfront, 150 m from Caffyn's Field public park, 350 m from Oyster Pond, 450 m from Harbour Park Amusements and 600 m from the seafront itself.

6.56 There is good public transport access to the South Downs National Park

Neighbouring amenity

6.57 The relevant local policy is D DM1 (3) (Impact) which states that developments must:
'Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.'

6.58 The proposal will have no detrimental impact on neighbouring properties.

6.59 There is no extension of the existing property and as such there is no impact on neighbouring light or outlook.

6.60 Regarding privacy and overlooking, this might only be of concern to the rear of the properties on New Road immediately north of the proposal building. The proposal will have no detrimental impact on the privacy of these properties as there are no FF windows facing to the north. Further, the north-facing fenestration of the GF is fully screened by the existing fencing.

6.61 The presence of the site manager/concierge and the application of a comprehensive Management Plan will address any possible concerns regarding antisocial behaviour.

6.62 Regardless, there is no inherent link between HMO occupants and antisocial behaviour.

6.63 HMOs typically have a broad demographic range of occupants, including a range of age-groups and employment situations, and as such the range of occupants need not be incompatible with a typical area of residential family housing.

6.64 The floorspace of the proposal property is equivalent to multiple family houses and as such the intensity/density of occupancy is compatible with the surrounding residential area.

Sustainable transport

- 6.65 T DM1 (Sustainable Travel and Public Rights-of-Way) states: Proposals for all new development must:

'Be located within easy access of established public transport service(s), existing pedestrian and cycle networks, the committed and aspirational cycle networks and the green infrastructure network which links the development with key destinations including places of work, education, leisure and town centres'.

- 6.66 T SP1 (Transport and Development) states that:

'The Council will support transport and development which: Is designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services and passenger transport services'.

- 6.67 The proposal site is at a central location where the majority of community facilities can be readily and rapidly accessed on foot.

- 6.68 There are numerous bus stops nearby and the train station can be reached on foot in 6 minutes.

- 6.69 There is no inherent requirement for the occupants of the proposal site to require day-to-day use of a private petrol vehicle, given the highly sustainable location and excellent access to sustainable modes of transport. As such, the proposal is not expected to generate excessive additional parking demand or traffic.

- 6.70 Regardless, there are comprehensive parking restrictions in the area around the proposal site and as such the proposal is not expected to have any detrimental impact on parking and highway safety.

Sustainability of the development

- 6.71 The proposal makes use of an existing building at an existing brownfield site.

- 6.72 The development will be finished to a high standard and will be compliant with all modern expectations regarding energy efficiency and use of sustainable materials.

- 6.73 As discussed above, the sustainability of the location is already clearly established, with excellent access to public transport, community facilities and a wide range of external amenity.

Other considerations

- 6.74 A full Flood Risk Assessment will be submitted during the course of the application
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7 Conclusion

- 7.1 This proposal represents a valuable opportunity to generate much-needed cost-effective housing at a highly sustainable location in central Littlehampton. It includes a mix of HMO and C3 units.
- 7.2 The scheme makes efficient use of land and renews the use of an existing building at a central brownfield location at a time of significant shortfall in housing land supply.
- 7.3 The applicants are highly experienced HMO manager and the quality of the proposed development is assured.
- 7.4 The proposed use is consistent with the residential character of the area and, due to the floorspace of the site, the proposed housing intensity is also compatible with the existing neighbourhood.
- 7.5 There are no significant changes to the exterior of the building and as such there are no impacts in relation to visual amenity or light & outlook for neighbouring properties. There are no new FF windows and, therefore, no issues in relation to reduced privacy or increased overlooking.
- 7.6 There will be a manager's office onsite and the site will be managed through an appropriate management plan. Regardless, there is no inherent link between HMO occupants and antisocial behaviour.
- 7.7 Occupants will benefit from excellent access to public transport, community facilities and employment opportunities. There is no inherent requirement for the occupants to be reliant upon private petrol vehicles.
- 7.8 Given the above, we respectfully request that the Council approve this application without delay.
- 7.9 Further to Paragraph 38 of the NPPF, please do not hesitate to contact us by email to info@cmkplanning.com if there are any questions or points for discussion in regards to this application.



