



AH/200089A/L0004v2

9th September 2020

**By planning portal: PP-09265410**

Chief Planning Officer  
Portsmouth City Council  
Civic Offices  
Guildhall Square  
PORTSMOUTH  
PO1 2AL

Dear Sir

**Town & Country Planning Act 1990:**

**On behalf of Portsmouth City Council: Planning application for the change of use to interim accommodation for the homeless and rough sleepers (*Sui Generis*)**

**Former Elm Grove Library, 155-157 Elm Grove, Southsea**

Further to pre-application discussions, I am pleased to enclose a planning application for the change of use of the above property to facilitate the interim accommodation of the homeless and rough sleepers.

The application comprises:

1. Application forms & Certificate B
2. Site location plan and block plan
3. Existing floor plans and elevations (See attached schedule)
4. Planning statement and appendices (including management statement and student accommodation report)
5. Public consultation statement

The statutory change of use application fee of £462, plus the Planning Portal administration fee of £20.83 + VAT) has been paid via the Planning Portal.

### **Background**

In line with Portsmouth City Council's corporate vision to "Make Portsmouth a city that works together, enabling communities to thrive and people to live healthy, safe and independent lives" and reflecting its duties under the Homelessness Act 2017, the City Council in October 2019 adopted The Portsmouth City Council Homelessness Strategy 2018-2023. This included as Priorities Two and Three the reduction of rough sleeping and reducing homelessness. This strategy was supported by additional funding secured by the City Council as part of the national

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Rough Sleeping Initiative and aimed to halve the number of people sleeping rough by 2022 and eliminate it by 2027.

This strategy has been given further focus by the ongoing Covid-19 health emergency. At the end of March the government wrote a letter to the leader of every local authority in England asking them to accommodate all people sleeping rough or at risk of sleeping rough and to find alternative accommodation for those in “shelters” where they could not easily self-isolate in order to prevent the spread of COVID-19. Temporary accommodation was provided in a number of locations across the City including at hotels and hostels that had closed due to Covid-19 restrictions.

As the restrictions have been lifted and those premises have re-opened for trade, additional funding has been provided to local authorities to fast track the longer-term safe accommodation needed so that as few rough sleepers as possible return to the streets.

As part of its strategy to move on homeless people into more permanent accommodation, the Council has been presented with the opportunity to purchase a number of under-utilised properties in the City that will assist with the transition to permanent accommodation.

### **The premises**

The application premises at Elm Grove Library provides five cluster flats, with a total of 19 bedrooms that have been utilised for a number of years as student accommodation. There has however been significant growth in new, bespoke student accommodation in the City in recent years and the premises have not been fully let. The landlord expects demand for accommodation this year to be reduced further due to the Covid-19 health emergency.

Following the closure of the Elm Grove Library, planning permission was sought in 2012 for the conversion of the building *“to form halls of residence within Class C1 (comprising 19 study bedrooms arranged as five cluster flats) and construction of cycle and bin stores with associated landscaping.”* Permission was granted under reference 11/01316/FUL on 29<sup>th</sup> March 2012.

In September 2020 an application was submitted for the temporary use of the premises for emergency accommodation for the homeless and the premises has been in that use since that time.

### **The proposal**

This application seeks consent for the change of use of the premises to interim accommodation for the homeless and rough sleepers.

The application does not propose any physical changes to the premises.

As the Management Statement outlines, security and management of the building and escalation policies for the behaviour of individuals have been considered carefully as part of this proposal, with lessons learnt from the period of emergency occupation since September.

Elm Grove Library is used as a supported temporary night shelter as a short-term solution for the Homeless in need of low-level support. Those who use the site may still have substance

misuse issues but will be being supported through those by the onsite support and help of Public Health.

Individuals who use the accommodation will be on licence and will agree to be part of a pathway through to more permanent accommodation. Therefore, this is not the permanent home of any individuals, and some may stay only a few weeks whilst others may take months before being suitable for move on.

They will therefore enter into an occupation agreement that will address a wide range of issues but will include measures relating to congregation outside of the site and the management of illegal drugs and the type of alcohol permitted on the premises. Users of the service will be encouraged to engage with support workers and/or use the restarted day service.

The Society of St James (SSJ) / Two Saints will provide on-site support, with further off-site support available. A security firm has been employed during the set-up of the premises and will continue to support the site in line with the Management Statement.

### **Consultation**

Due to commercial confidentiality constraints and the Covid-19 health emergency, pre-application consultation has been limited to a mail consultation with neighbours to the three sites where residents have been able to submit comments on the proposed application via the Portsmouth City Council website. A neighbour consultation report is provided with this submission. Consultations have also been undertaken with key stakeholders as part of the temporary use of the premises. Additionally, Cabinet members have been consulted throughout and were presented an Information Update Report in a Cabinet meeting on 1<sup>st</sup> December.

### **Planning considerations**

The compliance of the proposal against the development plan is considered in more detail in the submitted planning statement. However, the key points can be summarised as follows:

- The proposed development is sited within the urban area where development is in principle supported;
- The proposal will have no effect on housing supply. Indeed, it will bring into full use an existing residential building that is presently underused;
- Due to the particular characteristics of the proposed use, the accommodation is an acknowledged exception to the requirements of Local Plan Policy PCS20 and the associated national standards;
- The proposal will not materially affect the supply of student accommodation (as evidenced by a detailed assessment by Vail Williams);
- The proposal is within a sustainable location where the potential for access to public transport and non-car modes is maximised;
- The proposal will have no material change in impact on residential amenity, with occupation managed actively by the Council's housing department and its stakeholder partners.

It is also material that the proposal is intended to address a need that is a corporate priority of the Council. Providing accommodation where homeless people may self-isolate is a key part of the Council's response to the management of the risk of transmission of Covid-19.

## Conclusions

This application proposal seeks the use of under-utilised student accommodation to meet an urgent need for accommodation to house homeless persons and rough sleepers as part of a Council led managed strategy to reduce homelessness and to improve life chances of those living on the streets of Portsmouth.

The proposed use can be accommodated without physical changes or any intensification of use of the building.

The submitted planning statement, with supporting evidence on student accommodation in the City, explains that the proposed use is compliant with the relevant policies of The Portsmouth Plan and satisfies the aims and objectives of the plan as a whole.

We therefore request respectfully that planning permission be granted for the proposed use.

Yours faithfully

Arfon Hughes  
**Director**

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**\*Due to the Covid-19 health emergency we are contactable on mobile numbers only\***

Encls: As above

cc. Ms E Randall Portsmouth City Council