

City Development & Regeneration
Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 3BQ

21st May 2021

Dear Sirs,

RE: 13 BRUNSWICK PLACE, HOVE, BN3 1ND

This letter is submitted on behalf of Investsave Ltd in support of the application for planning permission relating to the above site.

Planning permission is sought for a *Change of use from small house in multiple occupation (C4) to a dual use as dwellinghouse (C3) and small house in multiple occupation (C4)*.

1.0 INTRODUCTION

This application follows a recent grant of planning permission (BH2020/01336) for a change of use of 13 Brunswick Place, Hove from four-bedroom maisonette (C3) to four-bedroom small HMO (C4). BH2020/01336 was approved on 15th July 2020. The planning permission has been implemented and the maisonette is now occupied as a small HMO (C4).

The Applicant now seeks permission for a dual use, which would allow occupation of the maisonette as either a family home (C3) or small HMO (C4) depending on market demand. As a (C4) HMO it would provide four large bedrooms and be occupied by four to six persons. As a (C3) dwelling, it could be occupied as a four-bedroom family home.



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Chartered Town Planners

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Registered in England and Wales

The maisonette is equally suited to shared or family occupation. The dual use responds positively to City Plan objectives by ensuring a range of housing types continue to be accommodated across the city. No extensions or external alterations are required.

This supporting letter demonstrates that planning permission should be granted for the dual use (C3 / C4). Analysis is provided of:

- The site and area
- The approved small HMO (C4)
- Benefits of the dual use (C3 / C4)

This letter should be read in conjunction with the application forms, Heritage Statement and following drawings provided by Brighton Lease Plans:

- 18-B53-10: Site location and block plans
- 18-B53-21.B: Existing and proposed floor plans

2.0 SITE & AREA

13 Brunswick Place is a grand, mid-terraced, four-storey over basement townhouse built in the Regency style in the mid-19th Century. The site is in the Brunswick Town area of Central Hove to the north side of Western Road.

The building is finished in cream painted stucco render. It has deep bow-fronts to all floors with smaller sash windows above the front door at first and second floor. There are black painted railings demarking the front curtilage and to the first-floor balcony detail.

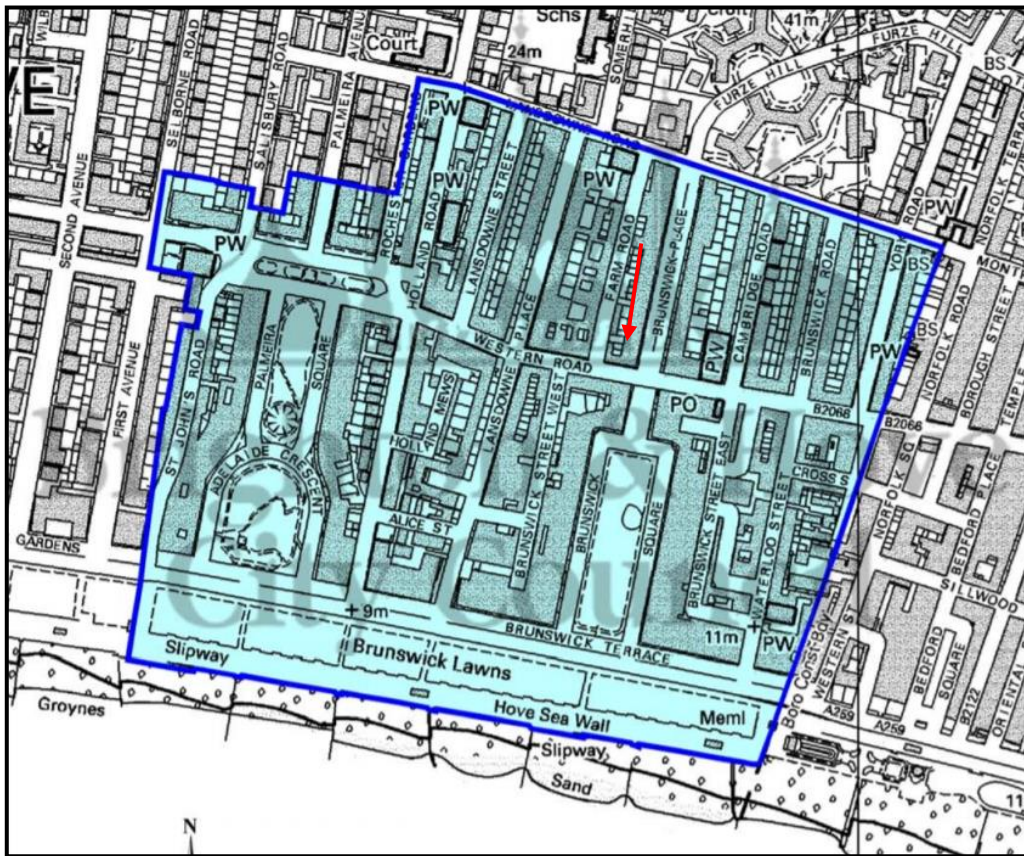
The full building comprises two self-contained maisonettes. 13 (the application site) is a four-bedroom dwelling over the basement level, ground floor and the majority of the first floor. 13A is a five-bedroom dwelling over part of the first floor, the second and third floors. Both maisonettes are currently in (C4) small HMO use.



(13 Brunswick Place, Hove)

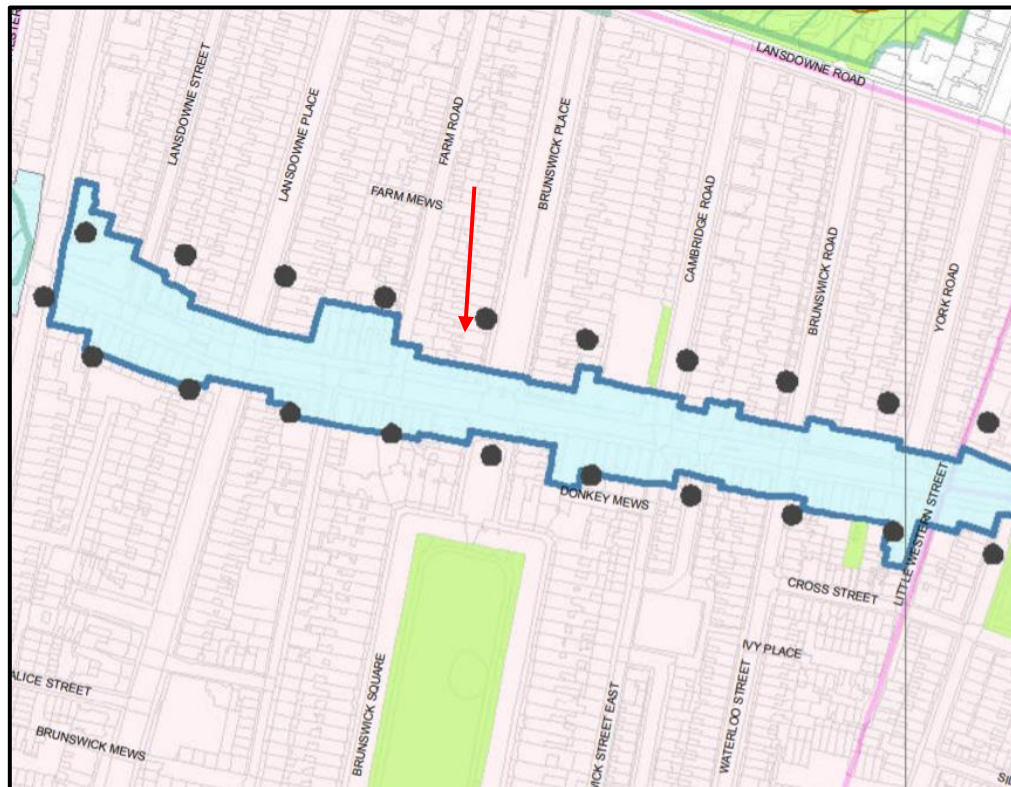
13 Brunswick Place is a Grade II Listed building forming part of the group listing 1204771. The Listing covers no 9 – 69 Brunswick Place (odds) and attached walls and railings. The elegant terrace is a particularly fine example of mid-19th Century architecture and comprises stucco rendered townhouses similar to no13 rising up the sloped street.

The building is within the Brunswick Town Conservation Area. The designated area covers the residential streets of exemplar Regency buildings either side of the vibrant commercial artery Western Road in central Hove. Brunswick Town is widely regarded as one of the finest examples of Regency and early Victorian planning and architecture in the country.



(Brunswick Town Conservation Area Map)

Adjacent Western Road is one of the principal shopping and services streets in the City. It comprises a vibrant mix of shops, restaurants, public houses, estate agents and service premises to the ground floor of grand Victorian buildings. Western Road forms a key part of the defined Regional Shopping Centre. The location is also within the City Plan Special Area SA2: Central Brighton where strategic objectives apply to reinforce the area's economic and cultural role.



(Extract City Plan Policy Map)

The principally residential streets north and south of this part of Western Road contain elegant terraces of Regency and Victorian townhouses similar to 13 Brunswick Place. The vast majority of these substantial residential buildings have been converted into flats. Brunswick Town is a densely populated area.

Whilst there is not a defined concentration of HMOs here, shared dwellings are a key part of the area's character. HMOs here provide suitable and accessible housing to notable demographics, particularly young professionals and hospitality workers.

This location, unlike other wards to the north and east of Brighton, is not recognised as one where there is an over-concentration of HMO properties. The Council introduced a citywide Article 4 Direction removing the permitted development right (Schedule 2, Part 3, Class L of the General Permitted Development Order) that allows dwellings to move between the (C3) and (C4) use classes. The Direction came into force on 3rd June 2020.

3.0 APPROVED SMALL HMO (C4)

Through BH20202/01336, the LPA calculated that nine of 127 neighbouring dwellings within 50metre radius of 13 Brunswick Place were in HMO use. This equates to an HMO density of 7%. This proportion means the 10% threshold of City Plan Policy CP21 was not breached, and the principle of development was acceptable.

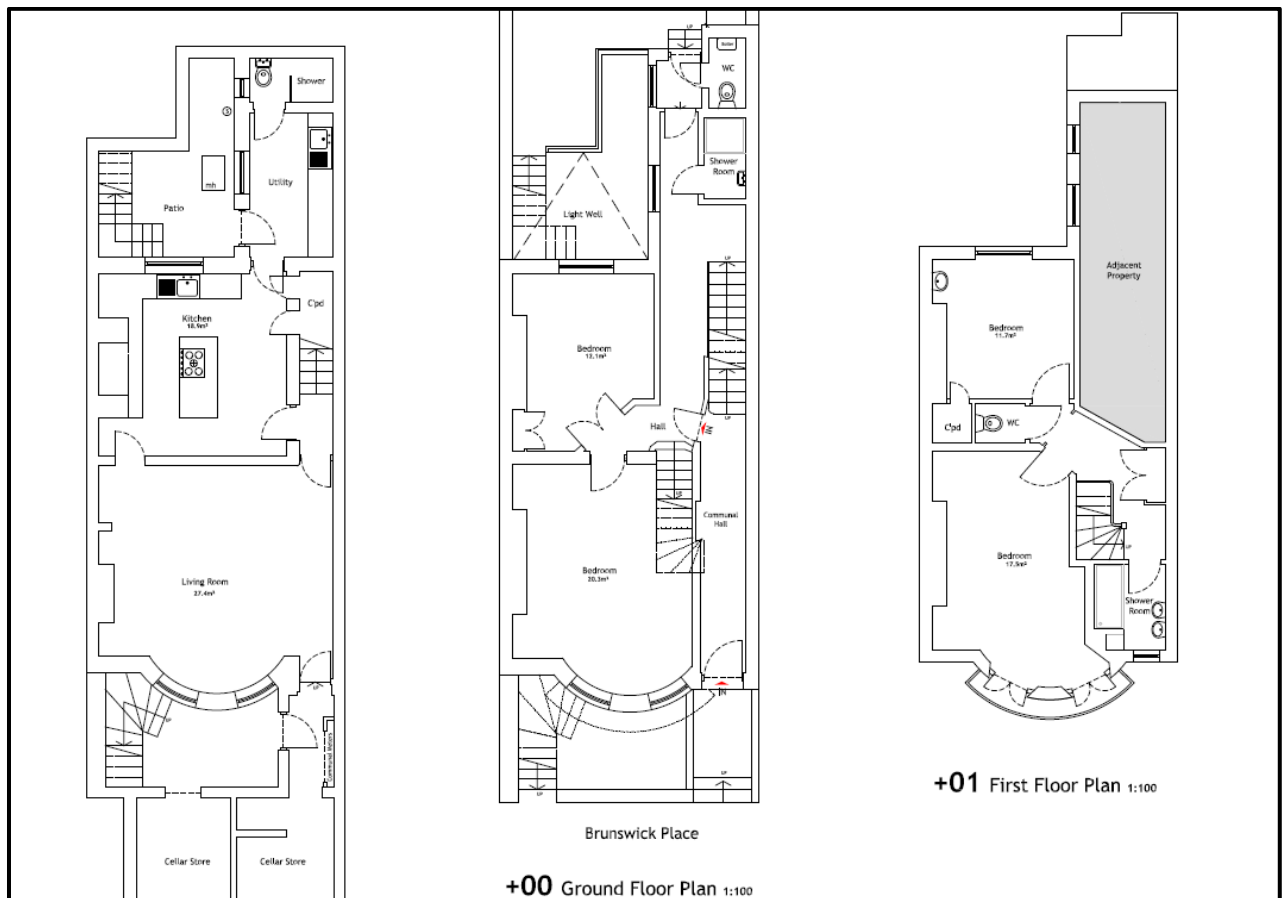
The Council's online HMO map has been re-checked. There remains nine identified HMOs within the vicinity of 13 Brunswick Place, including the upper maisonette 13A. As such the principle of a (C4) HMO use here remains acceptable. In any case, as the site is currently in (C4) HMO use no new HMOs are created and no change would be caused to the local balance of housing types.



(Extract BHCC online HMO map)

The substantial maisonette at 13 Brunswick Place provides a very high standard of accommodation for HMO use. The four bedrooms (ranging from 11.7m² to 20.3m²) are all large enough to be considered double rooms. A condition (4) was applied to BH2020/01336 limiting HMO occupation to a maximum of four persons, ensuring the four bedroom were single-occupancy.

This condition was accepted in relation to a sole (C4) HMO use. However, as a dual use is now proposed the property would likely be occupied by more than four persons when in (C3) use. As such, it would be reasonable to allow up to six persons (the upper limit of a C4 HMO) to occupy the maisonette when in (C4) HMO use. The larger two bedrooms would easily accommodate couples and the communal spaces are more than sufficient for six sharers.



(Existing and proposed floor plans)

The communal amenity spaces are very generous. The living room and kitchen at basement level provide 46.2m² of space. Such provision (which is in addition to a separate utility room, three shower rooms and three WCs) is nearly three times the minimum 16m² expected for four sharers in the draft City Plan Part 2.

Moreover, it is very unlikely that undue levels of noise or disturbance would be caused to the amenity of neighbours by the HMO use of 13 Brunswick Place. The site is in a busy mixed-use location and the HMO use is comparable to a (C3) use in terms of intensity. As

such, the (C4) use will protect the amenity of existing and future residents in compliance with Local Plan Policy QD27.

For these reasons, the (C4) HMO use of 13 Brunswick Place was previously approved. These matters remain acceptable so there is no reason for the HMO element of the dual use proposed to be resisted.

4.0 BENEFITS OF THE DUAL C3 / C4 USE

The spacious accommodation at the maisonette is equally well-suited to family occupation. The double-sized bedrooms allow for parental members. The large living spaces allow for family activities. Outdoor amenity space is provided by the patio and west-facing garden.

The dual use (C3 / C4) will allow 13 Brunswick Place to respond to market demands, enabling the property to fulfil either family or shared housing needs in the area. This flexibility means the maisonette will help ensure a range of housing needs continue to be accommodated across the city. The dual use aligns directly with the stated objective of City Plan Policy CP21 in this regard.

Allowing the maisonette to move between (C3) and (C4) uses also means that existing rooms are less likely to be subdivided or altered to intensify an HMO use in the future. It is highlighted here that 13 Brunswick Place is Grade II Listed, so that listed building consent would be required for any internal alterations. No alterations are proposed as part of this application. However, it is noted that a dual use would be less likely to lead to future pressures to alter the building.

It is further probable that the dual use would benefit community cohesion. The high-quality accommodation is likely to attract re-occupancy year on year (whether by a family or shared group). So that occupation of the maisonette would be less transient than at other HMO properties.

For these reasons, a dual use (C3 / C4) at 13 Brunswick Place supports the aims of the City Plan by providing a high-standard of accommodation and supporting a range of housing types.

SUMMARY

Planning permission is sought at 13 Brunswick Place, Hove for a *Change of use from small house in multiple occupation (C4) to a dual use as dwellinghouse (C3) and small house in multiple occupation (C4)*.

Planning permission was recently granted (reference BH2020/01336) for a four-bedroom HMO (C4) here. The (C4) HMO use has been implemented and the maisonette is occupied as an HMO.

The Applicant now seeks permission for a dual use, which would allow occupation of the maisonette as either a family home (C3) or small HMO (C4) depending on market demand. As a (C4) HMO it would provide four large bedrooms and be occupied by four to six persons. As a (C3) dwelling, it could be occupied as a four-bedroom family home.

It has been shown that all matters pertaining to the (C4) HMO use remain acceptable. It has also been shown that the proposed dual use will benefit the local housing stock and supports the objectives of the City Plan with regard the balance of housing types.

In light of this, Brighton & Hove City Council are respectfully requested to grant planning permission without undue delay.

However, if the LPA requires any further information or clarity to assist in the decision making we would be happy to provide it upon request.

Yours faithfully

Lewis & Co Planning