

ADDENDUM TO PLANNING STATEMENT

On behalf of: Issam Property Limited
Property: Edith Road, Clacton on Sea, Essex CO15 1JU

Fisher Jones Greenwood LLP
Charter Court, Newcomen Way, Colchester Business Park, Colchester, Essex CO4 9YA
Ref: SS/241367/1

1. The Council, in respect of the pre-application response, requested consideration was given to the making a couple of the smaller units larger, consideration of the technical space standards, consideration was given to the north facing windows, amenity space and detail was provided in respect of vehicular parking/cycle storage.
2. Firstly it must be considered that the proposed use comprises a sui generis use creating self-contained small flats for supported living; before the occupiers progress to full C3 residential accommodation, more generally through the private rental market.
3. The space standards do not apply to a sui generis use, they apply to a C3 residential use. The application proposal is not a C3 use.
4. The offer made by this application proposal is for supported living, as detailed within this main statement, for people who are homeless. That homelessness can derive from a number of factors/background.
5. This includes those who unintentionally find themselves homeless. An example of this could be somebody fleeing domestic abuse/violence where they are forced to leave their home for safety reasons. They may occupy the proposed units for a short time whilst they gather themselves together and save for a deposit for a private rental unit, and or whilst the domestic affairs are settled.
6. It should be noted that during the COVID 19 pandemic the Government have placed greater flexibility on movement for those fleeing domestic violence in recognition that this is a real issue. In addition Councils have been required to tackle rough sleeping to place rough sleepers in accommodation for their protection. This has increased the demand for accommodation to be provided by the Council.
7. The nature of the period of occupancy of the supported living proposed is generally 6 – 18 months, dependent on the needs of each individual and their ability to secure work if not employed, to save for a deposit and to find a private rental.
8. Currently these homeless people are living, with the Council's full knowledge, in hotels and bed and breakfast establishments paid for on a nightly basis at the Council's expense, or where they may be sofa surfing as an act of desperation before finding a more stable form of accommodation.
9. This accommodation currently afforded to these homeless people is undoubtedly smaller than the proposed accommodation at Edith Road. The nature of the bed and breakfast accommodation and hotels will comprise small rooms that in many cases will be the only space available to the occupiers, particularly where they are staying in small hotels.
10. The small hotel bed and breakfast establishments in Clacton, in fighting for survival, due to a downturn in this type of accommodation has resulted in many accepting Council referrals/people on housing benefit to allow occupancy and income. This is occurring as a matter of fact.
11. Furthermore, the Premier Inn, a large 66 room hotel has placed further constraints on the future operation of these small hotels and bed and breakfast establishments. In many ways it must be recognized that the appeal of these small units in Clacton has

significantly declined as the nature and offer of Clacton has changed over the years since its hey-day with Butlins attracting visitors to Clacton. These small hotels have adapted to accommodate a different market to enable survival.

12. As a matter of fact that part of the Edith Road application site's lawful use is as a bed and breakfast/small hotel. However, it is not used in this manner and has not been for many years. Instead it is used to house homeless people until they can find more suitable accommodation. The Council, we understand, have regularly and consistently been placing homeless people in these premises, including before the COVID pandemic.
13. These occupiers do not benefit from the supported living package offered by the application proposal. They are effectively on their own without the real benefit of support and guidance. Conversely the application proposal provides the additional supported living with contractual requirements for one to one support with signposting and support to reintegration, social/health welfare and job securement.
14. It is therefore entirely reasonable to identify that the application proposal does not provide a poorer standard of accommodation it is in fact the converse.
15. The occupiers of the units will undoubtedly have a better improved standard of accommodation than would otherwise be offered through sleeping on the streets, sofa surfing or located within small hotels and B&Bs within the Tendring District.
16. The occupiers of the units will have a settled place to personalise their accommodation, receive active support to enable them to regain full control of their lives in a carefully managed and supported way.
17. Facilities will not be shared, each unit is self-contained with responsibilities for managing and cleaning the unit.
18. The application site, as previously discussed, is located extremely close to a full range of facilities where parks, public gardens/the promenade and the beach are a short walk away. The site is highly sustainable and where occupiers in any event due to their personal circumstances would be highly unlikely to have access to a private car. They are much more likely to be dependent on public transport where the application site has ease of access to buses and the train station, as well as taxis.
19. Access to shops and other services is readily available alongside public transport links by bus and rail including to higher order settlements.
20. Cycle provision, with secured bike stands is available to the occupiers and located on the site. This will enable occupiers to have the ability to store cycles and use this mode of transport as an additional mode of travel to access services and facilities.
21. In respect of private amenity space the existing properties currently have virtually no private amenity space. There is no land availability, due to the tight grain of the existing development with the inability to secure additional land. However, the site is located extremely close to areas of public access, including the Promenade/sea front, public garden and parks. All of these are only a very short walk from the application site and provide a good standard of public amenity space. This is also referred to within the main Planning Statement.
22. Part of the application site can lawfully be used as bed and breakfast accommodation, part has through the enforcement appeal, recognized that 4 units

within the bed and breakfast use have become lawful for independent residential use. This represents an unusual form of mixed use where the units could be sold off independently. It is understood that the application site across all three properties has 40 rooms in total for use as their lawful use.

23. In the past 45 rooms have been offered/occupied across the site. The application proposal results in not only a managed form of supported living where there are additional constraints placed on the occupiers to ensure sociable behavior and re-integration into society, but also results in a lower number of units, 34 units of accommodation thereby significantly reducing the overall numbers of units.
24. Consideration has also been given to try to reduce the number of units in line with the Council's pre-application response where units 31 and 33 on the upper second floor are the smaller units. These are located one unit, 31 in number 6 Edith Road and unit 33 in number 8 Edith Road.
25. In consideration of rationalizing these units to make larger units it would simply not be realistically feasible/ possible to use this area to provide larger units because it would impact on the other units within the building and result in an unworkable relationship resulting in the loss of space/dead space which would become problematical for the operators. In addition the building regulation requirements do not readily allow any alternative form of layout without substantial disruption to the existing fabric of the building. The room arrangement uses the existing walls and features in almost every unit.
26. In consideration of units 31 and 33 further consideration has also been given to the next two smaller units unit 15 and unit 22 with unit 15 being in number 4 Edith Road and unit 22 in number 6 Edith Road.
27. Again because of the existing floor layout and room configuration it would be difficult to rearrange these units to provide bigger units without resulting in a loss of valuable space. In addition there would also be problems with the building regulations, particularly in relation to fire protection.
28. Consideration has also been given, as requested by the Council, to the windows that are north facing and located within the building. The windows on the rear and the side of 8 Edith Road face a north westerly and north easterly direction. Careful consideration has been given to the fenestration arrangement within the building whilst seeking to utilize existing windows. Changes to the fenestration pattern to these aspects is considered to be highly likely to result in a detrimental impact on neighbours' amenity due to the tight grain that exists with the neighbouring dwellings.
29. Some of these windows are existing windows where the north westerly facing wall forms the side elevation. The rear elevation of all three properties is facing north east and not true north.
30. It is noted that both the current Local Plan and the emerging Local Plan have policies seeking to retain existing visitor accommodation. It is also noted that the current and the emerging plan have policies supportive of flat creation. The National Planning Policy Framework is also supportive of meeting specialist housing need. The application proposal offers a specialist form of housing where there is a proven need.
31. If the Council are to enforce their planning policy with the use of existing small hotels and bed and breakfast establishments then this will lead to a significant increase in

homelessness within the District. This presents the Council with a significant dilemma and conflict with their statutory requirements.

32. The loss of 4, 6 and 8 Edith Road that already have a complex planning history, including the ability for self-contained flats within existing lawful hotels/bed and breakfast accommodation and to be used as proposed by the application represents opportunity for the Council, as well as the applicants. This application can provide the necessary rigor of planning conditions to provide control going forwards.
33. In consideration of the Council's Homelessness Reduction and Rough Sleeping Strategy 2020 – 2024 it is noted that the number of homeless people in temporary accommodation placements in B&B/other nightly paid accommodation has significantly grown from 2014 to 2015 recording 57 placements to 182 placements in 2017/18.
34. The numbers of single people making homelessness applications has more than doubled between the periods of 2014/15 to 2017/18 to 112 single people, excluding households with children and other household types. There were 704 homelessness applications in 2018 to 2019 – 344 of these applications were made from single people and 232 placements were in B&B and other nightly paid accommodation.
35. The Strategy recognises that the trend is clearly rising and whether Homelessness Reduction Act 2017 may have contributed to the rise is acknowledged by the Council in its Strategy.
36. The COVID 19 pandemic has placed a requirement on the Local Authority to place rough sleepers in accommodation so that they are not on the streets during the pandemic.
37. The Council's report further states "the number of households placed in B&B or other nightly paid accommodation has increased significantly which would indicate the difficulties both the Council and clients have in sourcing accommodation in the current market."
38. The Council have also developed services to address rough sleeping.
39. The report further identifies the need to look for cheaper, better, more affordable accommodation as an alternative to nightly paid accommodation, including working with private investors, such as the applicants.
40. A priority for the Council is to work with the Clacton Town Centre Group to tackle issues in the town relating to homelessness, rough sleeping, street drinking and begging.
41. Of course many of these go hand in hand where rough sleepers are forced to beg for money to survive and may also be abusing substances due to their poor unsupported lifestyle, but this is by no means the only nature of homeless people.
42. The applicants operate a model that provides management of the premises, positive support to the occupiers, tackling homelessness and rough sleeping alongside further support for personal welfare through the one to one support and contractual requirements for occupiers alongside the additional tenancy requirements.

43. This applies to all prospective tenants, including those that may be fleeing domestic violence or may be rough sleepers or may be homeless for other reasons.
44. In addition the applicants are providing exactly what the Council are seeking and as identified in their Strategy being a more affordable level of accommodation through securement of accommodation with private investors. The rental values are set by the Council thereby dictating the type of accommodation offered. Private investors are not going to support the Council in tackling homelessness if it is not adequately supported and revenue sufficient to meet the provision.
45. The provider has agreed, in principle, via a rent test with the Council's housing team a rent that is well below market rent ensuring tenants can afford to seek employment. The public purse is not subsidising high rents and where this rental meets with policy regarding social rents.
46. This of course has the effect of limiting the funding/investment that can be achieved and where there is a chronic shortage of this type of accommodation, both locally and nationally.
47. The applicants advise that with property prices within the area it is unlikely that any developer could afford to refurbish or build accommodation at these rent levels to deliver the much needed accommodation.
48. Edith Road presents a rare opportunity to resolve a local problem, bringing a much need resource and positive investment in to the building with the resultant beneficial impact on the street scene.
49. The Council would benefit from a not for profit homeless charitable organization that is investing in accommodation, jobs whilst assisting the Council with meeting its statutory obligations both in the short and long term.
50. In addition the provider once established would seek to bring move on accommodation thereby creating a much needed pathway out of homelessness and stopping people re-presenting.
51. The applicants are committed to working with Tendring Council to deliver the supported living accommodation at Edith Road. For the Council this will mean that the current unlawful/unauthorised uses will cease, the building will be the subject of significant investment through external and internal improvements, not only to improve the living conditions of future occupiers, but also to the benefit of the street scene and wider site context.
52. Site works which includes a full exterior refurbishment is budgeted around £1.4 million pounds. Overall the investment to the site is £3 million pounds, including all costs. The Site will benefit from effectively a full refurbishment which include all fixtures, fittings, electrics, plumbing, heating, windows, insulation, roof, garden interior and exterior, new kitchens, bathrooms, communal areas and improved security as well as some staff office space. The Council will have affordable units to make referral to thereby reducing, in part, their current practice of needing to place people in nightly paid accommodation that undoubtedly represents a poorer nature of accommodation than that proposed by the applicants.

53. The application proposal has the ability to result in a positive outcome for the Council and lead future occupiers, following their supported living signposting and support, to independent living. Whilst homelessness will undoubtedly continue to exist the application proposal provides the stepping stone for many to overcome homelessness and move forwards away from supported living in due course.
54. There is a significant reduction in the number of units of accommodation as a result of this application.
55. The Council are requested to fully assess the information provided, in the main planning statement, this addendum statement and the submitted plans all of which are considered to justify the application proposal. Should there be any queries please do not hesitate to contact the applicant's agent.
56. Attached at the end of this statement is an overview, provided by the applicants, of Circle, the site operators to enable a further understanding of the site operation.

Mrs Sharon Smith, MA MRTPI
Planning and Enforcement Manager
Fisher Jones Greenwood LLP

16 June 2021

An overview of Circle Housing Staffing provided by the Applicants.

As per Circles discussions with the Housing team at TDC Circle housing propose to create an office / Hub in Tendring to establish a permanent team and presence in the district. This goes alongside their 5 year business plan to develop temporary and move one accommodation within the Tendring district.

The office space at Edith Road would be a low key office, but establish a daily housing staff presence from the organisation which would generally be 9am to 5pm Monday to Friday.

In addition to this, and more importantly, Edith Road would allow a significant staff investment for Circle housing front line staff to support the tenants both at Edith Road but also on site at the respective sites for other accommodation within the Tendring District that they manage or bring online.

These housing support staff would deliver in addition to the office hours, an additional 60 to 90 hours per week of front line supported and intensive housing management.

These hours would also include evening and weekend cover ensuring, alongside the CCTV, and robust housing management a well-managed site.

It is also worth noting the quality of the staffing offer. Circle Housing already has a core staff team who have been delivering front line homeless and supported housing for 15 years but they have recently appointed Vivienne Depledge, formerly of Colchester's Beacon House homeless project to oversee Edith Road and Circle operations. She will be using the office as part of her day to day working. In addition experienced front line staff, both housing officers

and housing support workers are identified and in post to work at Edith Road, also working alongside the Council's homeless team.

Circles discussions with the Council set a vision where Tendring District Council have a managed site which they have exclusive nominations into. This would operate much like Colchester Council's, Hagrode Court site or Braintree Council's Digbys Court site. A hub taking in those at risk of homelessness, ensuring they receive guidance and support, signposting and ultimately move on opportunities ultimately reducing repeat homelessness applications.

The Edith Road site would overall have 12 less residents than the current use and rather than old fashioned and outdated HMO use with all its anti-social behaviour, trashed communal space, lack of tenants pride and ownership in their own space. It would have self-contained trainee/ starter studios accommodation where every tenant is truly responsible for their own behaviour, tenancy, visitors, bills, and an organisation who can monitor and deal with tenancy infractions robustly and quickly.

Lastly should an incident occur as does inevitably happen in all supported accommodation Circle can flex the staff rota quickly to ensure additional cover or resources are in place to promptly settle any issues.

Although local residents do have issues reservations about the current set up and likely continued use. Our offer can only be a significant step change for the better for the local residents as Circle actively and pro-actively develop relationships with neighbours to ensure any issues complaints are sent to them direct to deal with and feed-back upon without issues escalating and becoming unmanaged.