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architecture & planning

Our Ref: JMH / PL / 23-008-11

**By Submission**  
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# PLANNING SUPPORT DESIGN & ACCESS STATEMENT

27 Bath Street, Southport, PR9 0DP

Change of Use from a 10 Bed Guest House (C1) to a House in Multiple Occupation (Sui Generis)  
(8no Units) and associated works

## Introduction

This statement has been produced in support of a Full Application for the proposed Change of Use from a 10 Bed Guest House with shared facilities (available on short-long term rent) (Planning Use Class C1) to a 9 Bed Large HMO with shared facilities (Planning Use Class *Sui Generis*).



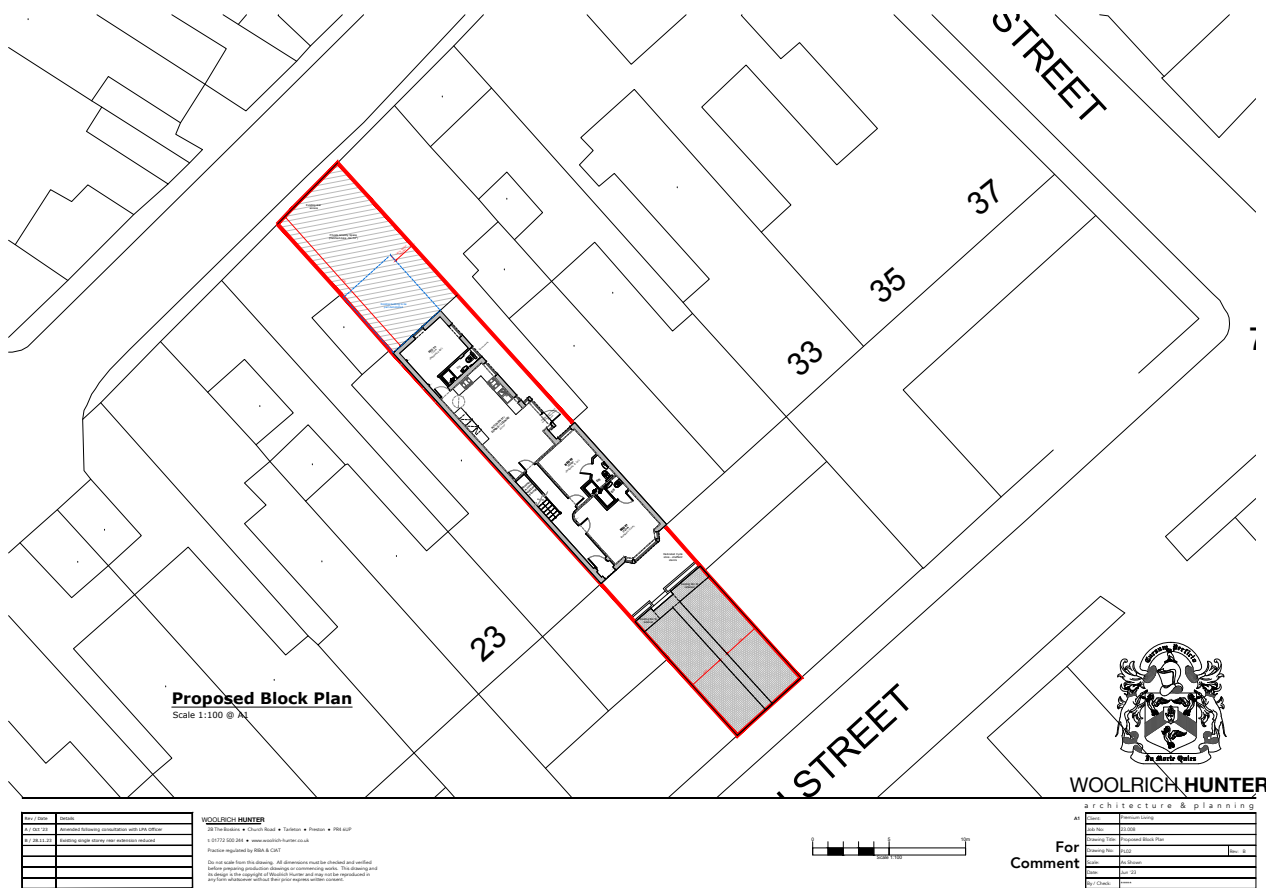
This document is intended to be read in conjunction with the Design and Access Statement for the project, which sets out the proposals in greater detail.

## Site Description

The application site is situated in an area designated as Southport Resort Area , Southport Central Area and a Regeneration Site on the Council's Adopted Unitary Development Plan. The application site is within the Southport Central Area on the emerging Local Plan. The site is within the Promenade Conservation Area.

The application property is a well proportioned and spacious terraced property, with a long standing historic use as a 10 bed unit Guest House.

Given the Town Centre location, the application site provides excellent links to sustainable modes of public transport, together with key services and local amenities. There are a total of 4no. Existing vehicular bays to the front of the property, offset with proposed secure cycle stands located to the rear of the property within the site curtilage.



This application seeks to supersede a previously withdrawn application DC/2023/01332, in which issues were raised in relation to the following;

- Shortfall in Room Sizes
- Poor/Constrained Outlook
- Significant Shortfall in Private Outdoor Amenity Space

## Proposal

The proposal seeks planning permission for the change of use of this 10 bed unit Guest House (C1 Class) to an 8no. Bed Large HMO (Sui Generis Use Class) - At the time of application, the application property has been granted an HMO Licence for occupancy of the premises up to a maximum of 10 people.

Given the historic use of the premise as a guest house with shared facilities; no external alterations are required with the application largely comprising a material change of use only.

The purpose is to continue to offer high quality, affordable shared accommodation to working Professional people such as key workers, graduates, local workers and those on secondment from established employment (not intended for Students).

The property has recently undergone a full complete renovation, undertaken by the Building Owner; Premium Living. The alterations include (but not exhaustive) the following:

- Creation of additional communal areas and facilities, including full decoration and equipment provision.
- Full re-wire and re-plumb to ensure the property is to modern code standards and ultimately “fit-for-purpose” as a minimum.
- Improvements to heating and hot water systems.
- Fully comprehensive Fire Alarm system to an addressable L2 standard and up date to FRA / Strategy management plan.
- Full fit out of 9no. High quality bedrooms for single occupancy.
- Fully refurbished throughout
- Creation of refuse storage area and secure cycle storage.  
NB. The aforementioned alterations are indicated on the supporting submitted GA Floor Plans.

As part of the revised submission, steps have been taken to address the LPA initial concerns, offering up revised internal arrangement plans in the pursuit of improvement of room sizes and general outlook. Furthermore, it is proposed to reduce the size of the rear single storey extension to increase the rear private amenity space.

## **Relevant History and Consultation**

The site has been historically used as a Guest house, available to Tenants on a short - long term basis, akin to a modern day HMO. The applicant has met with Housing Practitioner Officers (Housing Standards HMO Team) of Sefton Council on several occasions to gain a clear understanding of the required standards for properties of this kind and has fully complied with all requirements, being advised that the proposal would not encounter any issues based on said HMO standards - as such a Final HMO Licence has been awarded to the property under the Housing Act 2004, Part 2 (M-0001-00747-66222-x117).

To date the applicant has not received any objections from neighbours and does not expect to with the submission of this retrospective planning application.

Further to the original submission, this application seeks to supersede a previously withdrawn application DC/2023/01332, in which issues were raised at the time of consideration. The betterment proposals will be addressed later in this document.

## The Applicant

Premium Living is a family business with over 20 years experience in the property industry, with portfolios in the UK and abroad. PL provide premium accommodation to professionals who require luxury living arrangements in Southport and the surrounding areas, with either short or long term contracts and to suit most budgets. They have a locally established and experienced team who are dedicated to caring for their tenants and ensure that all properties are all refurbished on a regular basis and maintained to a very high standard.

Premium Living are committed to meeting local housing need by providing high quality shared accommodation for local professionals and key workers alike. Further information about PL can be found on their website: <https://premiumliving.co.uk/about-us/>.

## Quality of Accommodation

The property has been renovated to an extremely high standard which maintains the profile of PL. Examples of the accommodation are provided in the photographs in the attached below. Sustainability is important to the applicant, and energy efficient appliances including a washing machine, tumble drier, microwave, dishwasher, refrigerator and freezer have been provided. High- speed broadband and Freeview television has also been provided with individual ports in each bedroom.

The applicant employs professional cleaners to maintain the property on a weekly basis and uses the services of a gardener for external upkeep.





## Tenants

The applicant is committed to ensuring that the use of the property as an 8no - bedroom HMO does not have an adverse impact upon the amenities of the surrounding neighbours. The applicant carefully screens all prospective tenants, using background, employment and credit references. If an applicant is from outside the country an identity check will also be included to validate their legal status in the country.

In many areas there is great concern about the effect HMO's have on the local community, this can be caused by density of that type of housing, noise and anti-social behaviour from tenants. The applicant believes that this is caused by the choice and standard of property. By providing a high-quality residence aimed at working professionals this problem simply does not exist.

Additionally, the applicant will continue to manage the property in the following ways to ensure that any issues affecting the other tenants, neighbours or the larger community are dealt with immediately:

- Each tenant is vetted.
- The applicant will continue liaising with neighbours who have been given contact telephone numbers of the applicant. The applicant will continue to visit the property once a week to check on communal areas.
- Quarterly inspections of all bedrooms will continue to take place to ensure the highest standards are maintained.
- Both the weekly cleaner and gardener will also continue to monitor and report any concerns to the applicant.

Whilst it is not applicable to this type of property the applicant endorses the Government's 'Respect Standard for Housing Management'.

## **Planning Policy and Material Considerations**

The proposal seeks to comply with the policies contained in the Sefton Council's Local Plan and Supplementary Guidance. In order to support this proposal, the applicant has drawn on a wide range of other reference material (not exhaustive):

- Local Plan for Sefton (2017)
- Design SPD
- Flats and Houses of Multiple Occupation SPD (2023)
- Sustainable Travel and Development SPD (2018)
- New Homes SPD (2023)
- National Planning Policy Framework (2021)
- Sefton Housing Strategy (2022-27)
- DCLG 'Residential Car Parking Research'
- Article 4(1) Direction (relating to Central Southport)

## **Relevant Planning Policy**

### *Policy SD2 Principles of Sustainable Development*

This proposal complies with the aims of this policy by helping to meet Sefton's housing needs as it is providing high-quality accommodation for a maximum of 10 tenants with the curtilage of an existing property, contributing to the diverse requirements of the local population and adding to the mix and type of housing choice in the area.

Due to the high-standards of accommodation, as shown in the images contained within this document, the property has been designed and refurbished to be practical, comfortable and fit for purpose for occupation by 8 individuals (up to max.10). The application is a material change of use, with no changes will be made to the property, with the number of occupiable rooms has been reduced to 8 (from 10).

### *Policy HC2 Housing type, mix and choice*

Whilst this proposal does not relate to developments of 25 or more dwellings, it does help to contribute to the type, mix and choice of housing options within the area as it is effectively providing accommodation for 8no. individuals in the form of private bedrooms and shared communal facilities within an existing large and spacious property with excellent Town Centre links to sustainable travel, local amenities & open public greenspace.

### *Policy HC4 House extensions, Houses in Multiple Occupation and Flats*

The proposed use of the property as a 8no-bedroom HMO is appropriate for the character of the area because there are a number of other HMO properties in and around the neighbourhood, whilst the property itself is in-keeping in terms of appearance with the street scene. No alterations or external works are proposed as part of this application, so the visual amenities of the area are safeguarded as a result.

In addition, the high-quality refurbishment carried out in 2016 to convert the property into an HMO have meant that the living conditions are of exceptional quality, as demonstrated in the photographs shown over. Given that the property is used as a short-long term Guest House, the impact of having 8no. tenants in the property is minimised already in terms of noise, disturbance and the comings and goings of tenants. This is further minimised by the professional nature of the tenants allowed to live in the property, along with the way the applicant proactively and professionally manages the property.

As the number of tenants in the property will be decreasing, the applicant is confident that the proposed use of the property as an 8no-bedroom HMO will not have any adverse impact on the amenities of neighbours of the property, or on the amenities currently enjoyed by the tenants. There will be no loss of privacy, overlooking or any increase in the number of cars brought to the house for all concerned parties, whilst the amount of refuse and recycling materials produced by having 8no. tenants in the property will not significantly change either, meaning the current provisions will be sufficient and will not cause any issue with regard to visual amenities.

### *Policy EQ2 Design*

The property responds very well to the character of the area in that it is well maintained, both internally and externally to ensure it remains in-keeping with and enhances the surrounding neighbourhood and the amenities currently enjoyed by both tenants and other residents in the area. In addition, due to the large block-paved driveway at the front of the house, both pedestrians and vehicles are able to safely enter onto and exit the site without compromising highways safety or the safety of pedestrians on the pavement.

With regard to the design of the property, nominal external and internal alterations are proposed, the property continues to make a positive contribution to its surroundings, being an attractive terraced property, which is regularly maintained by professional cleaners, gardeners and maintenance companies.

Furthermore, due to the high-quality nature of the refurbishment works carried out, the property has in-effect been 'future-proofed' as thermal and energy efficient appliances and measures have been installed, whilst the internal layout of the property allows tenants to relax and enjoy living in a large, spacious and well-designed flexible and accommodating house. However, should the use of the property as a HMO ever cease, it can easily be converted back into its current Guest House form, or equally a residential family home, ensuring that the use of the property is adaptable.

### *Flats and HMOs SPD (2023)*

The property is located within the Article 4(1) Direction area. The Direction prohibits the Change of use from a use falling within Class C3 (dwellinghouse) of the Schedule to Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C4 (Houses in Multiple Occupation), being development comprised with Class L of Part 3



of Schedule 2 to the said Order and not being development comprised with any other Class.

Whilst the proposed change of use to a HMO is evident - it does not result in the loss of a C3 Dwellinghouse. The proposed change of use is from C1 to Sui Genesis and thus not strictly covered under the terms of the Article 4(1) Direction.

At the time of application; a zone assessment has been made of neighbouring registered HMOS's to ensure that the proposed COU will not result in an intensification of type use.

The applicant is confident that the property suitably complies with the "aims" of the SPD in that it provides high-quality and affordable accommodation for a maximum of 8no. tenants within the curtilage of a large and spacious house, meaning that tenants do not feel 'cramped' and 'over-crowded'. Noise and disturbance are not an issue at the property, nor is there any loss of privacy due to the existing use and is large enough to accommodate the number of intended tenants without problems arising.

Furthermore, the location of the property is in a highly accessible area, whilst the attractiveness of the property contributes positively to the residential amenities and character of the area.

All bedroom sizes and shared communal facilities meet the standards contained in the SPD as well as satisfying the HMO licensing criteria, ensuring that each tenant is provided with suitable high-quality private accommodation and shared facilities appropriate for the number of intended occupants.

Each bedroom has its own window with a reasonable outlook given the parameters of the site and town centre locality. The private rear garden whilst large enough to accommodate 8no. tenants, (allowing them to use and enjoy the outdoor amenity space provided throughout the year), falls short of the recommended 10m<sup>2</sup> per occupant, offering approximately 64m<sup>2</sup> (approx. 80% of the minimum provision), this is not uncommon or unusual within the town centre and can be considered acceptable given the community facilities and open public space close by within walking distance. The garden itself is regularly maintained by a gardener as well.

In addition, a suitable space for refuse and recycling bins has been provided to the rear of the property, allowing tenants to fill the bins easily and move them to the edge of the plot boundary, when required, for collection. The location of the existing refuse storage area can be seen from the front of premises currently, so the proposal to move these to the enclosed rear garden seeks to ensure that it is out of sight from the public view to avoid becoming an 'eyesore'. With the proposed use of the property as a 9- bedroom HMO, the refuse provisions will be adequate to continue serving 9 tenants.

With regard to off-road car parking, 4 car parking spaces have been provided on the large block-paved driveway at the front of the property (existing retained). As acknowledged by the SPD, tenants of HMOs are less likely to own a car, therefore, the location of this property is ideal as it is close to local bus stops and train stations, as well as local shops, restaurants, takeaways and other facilities and amenities. The provision of secure cycle

parking spaces are provided in the rear garden to encourage more sustainable travel choices, as shown on the submitted relevant plan.

This high-quality HMO for a maximum of 9 people will continue to contribute to the mix and balance of housing options within the neighbourhood and will not result in having a detrimental impact on noise, parking or waste management. Furthermore, its use as a Sui Generis HMO does not result in a non-HMO property being 'sandwiched' between 2 HMOs, or creating 3 adjacent HMOs along Bath Street - further information regarding registered HMO's in the immediate vicinity is identified previously.

The LDF makes reference to the aim of encouraging a supply of high-quality affordable housing. The applicant believes they have already demonstrated the superior nature the accommodation they offer but also how affordable this type of accommodation is with all-inclusive room rents. The applicant also believes that by offering this type of accommodation they enhance the choice for local tenants and assist with achieving balanced communities and supporting the local economy as stated in the LDF.

The applicant is confident that the change of use will not have a negative impact on neighbourhood amenity. The house will not contain more residents than a large family and all tenants will be vetted prior to their tenancy beginning. The Tenancy Agreement will also have stipulations in relation to respect for neighbours with particular regard for parking and noise. There will be inspections to ensure the property is maintaining the highest standards and cleaned weekly.

#### *Strategic Housing Market Assessment (2019)*

The SHMA states that it should be recognised that, in practice, the private rented sector does make a significant contribution to filling the gap in relation to meeting housing need and given the levels of affordable housing need shown in this study, the private rented sector is likely to continue to be used to some degree to make up for the shortfall of genuine affordable housing for the foreseeable future.

Furthermore, Figure 5.21: Estimated Size of Dwellings Required 2017 – 2036 – Affordable Housing states that by 2036 an estimated 2,707 1-bedroom households will be required, with a slight shift towards a requirement for smaller dwellings relative to the distribution of existing housing (figures identify a expected growth in type units being required). Additionally, it is recognised that young people may find barriers to accessing housing given typically low incomes and potential difficulties in securing mortgage finance due to deposit requirements.

This proposal therefore helps to support the housing need in the area by providing accommodation for a maximum of 9 Professional tenants within an existing property which has been refurbished to very high standards who may otherwise not be able to afford accommodation in a good central location with accessibility to a number of employment opportunities as well as nearby shops, amenities, services and facilities.

#### *National Planning Policy Framework (NPPF)*

The proposal fully accords with the objectives of the recently adopted National Planning Policy Framework (NPPF). This states that local authorities need to deliver 'a wide choice of high-quality homes' and 'create sustainable, inclusive and mixed communities.' This

application will improve the mix of community in this family area ensuring a more sustainable and balanced community.

The proposal can also be seen to comply with another key policy set out in the NPPF – the need to encourage effective use of land by reusing land that has previously been developed. By converting a large existing guest house, much needed accommodation has been provided without new development in an affordable manner.

### *Key Workers*

This HMO will also help address the need for key worker accommodation. There is an identified need nationally for housing for key workers to enable our core facilities to operate properly. An HMO for professionals such as this provides an affordable option for key workers to live near their place of work in high quality accommodation.

## **Transport & Parking**

### *Local Plan for Sefton (2017) Policy EQ3 Accessibility*

The property is located in a very accessible location, being within walking distance of local bus stops along Lord Street and Southport train station. Further to this, Southport Town Centre is again within walking distance, allowing tenants to access a number of large supermarket shops, cafes, restaurants and other facilities and amenities with ease. This ensures that cars are not necessary for tenants of the property to get around for work or leisure purposes.

Additionally, the applicant has provided 4 off-road car parking spaces (existing retained) and secure cycle parking for bicycles to be stored in the rear garden. The applicant actively encourages tenants not to bring cars to the property once the 4 driveway spaces are filled in order to ensure that highways safety is not compromised and does not lead to tenants parking cars along the street.

The property is also within convenient access of green modes of transport that provide linkages with the Town Centre and other places of interest. The applicant draws this information to the attention of new tenants to promote the use of green modes of transport.

No further cars are expected to be brought to the property. Furthermore, the applicant has not had any complaints regarding parking brought to their attention since the use of the property began as a 10-bedroom Guest House and does not expect to receive any complains going forwards.

### *National Planning Policy Framework*

The NPPF states that transport policies have an important role to play in facilitating sustainable development and developments should be designed so journey times are minimised. This site is situated in a very sustainable location within walking distance of local shops and bus stops and the train station is within easy walking distance.

## **Sustainability**

### *National Planning Policy Framework*

The applicant supports the Government's drive for sustainable development and this change of use will improve the sustainability of the wider community and of the property itself through the use of energy efficient appliances.

### *Local Plan for Sefton (2017)*

#### *Policy EQ7 Energy efficiency and low carbon design*

As a result of the recent refurbishment works carried out, the property has been upgraded to ensure it is both more thermally and energy efficient as A rated appliances have been installed and the thermal efficiency of the property has been upgraded to reduce energy consumption. With the proposed use of the property as an 8no.-bedroom HMO, the energy efficiency of the property is not expected to change or increase.

## **Security**

### *Secure by design and Crime Prevention through Environmental design*

The official UK Police initiative states that 'maintenance standards send powerful signals that undoubtedly influence people's behaviour. Sufficient resources must be made available to adequately maintain buildings and communal spaces'. The applicant employs a regular cleaner, gardener and window cleaner, monitors waste disposal and is committed to external maintenance to contribute to the street scene.

The layout of the property and number of tenants will also increase natural surveillance in the area as described in Crime Prevention Through Environment Design.

## **Refuse Management**

### *Local Plan for Sefton (2017)*

The applicant's proposal complies with this policy because the provisions for refuse and recycling at the property are located in an accessible location to aid with the storage and collection of waste materials generated by tenants.

As the number of tenants occupying in the property will be decreasing, the refuse and recycling storage facilities provided are more than adequate for the intended number of occupants with an established use. Additionally, since the use of the property began as a 10-bedroom Guest House, there have been no complaints either to the applicant or the council concerning refuse management at the property and no complaints are expected to be made going forwards.

## Planning Legislation

It is recognised that an Article 4(1) Direction was implemented on 21st June 2018 restricting “any change of use between C3 dwelling houses and C4 HMOs”. Despite this, the presence of Permitted Development COU in unrestricted areas signals the Government's recognition of the important accommodation gap HMOs fill whatever their size.

The applicants support the intention to ensure high standards of amenity for the shared housing sector and to ensure respect for the neighbourhood.

## Summary and Conclusions

Through recognised HMO planning legislation; "Shared homes ensure people who want to live and work in towns and cities can do so, and are vital to the economy."

The applicant is committed to providing high quality shared accommodation for professionals, enabling them to live and work in towns of their choice, contributing to sustainable development and meeting a growing housing need.

The historic use of the site as a 10 bed unit Guest House is akin to a modern day HMO in terms of material use, with the proposed COU presenting no material alteration to the use and character of the area.

The property has been appraised and inspected as to its suitability by Sefton's Housing Standards HMO Team. The property has been assessed against general Planning Policy and guidance pertaining to the occupiers use and enjoyment of the property, galvanised with the issue of a formal large HMO registered Licence.

The proposal to move the refuse and cycle storage to the rear of the property can be seen as a positive contribution towards preserving the character and appearance of the Conservation Area, as well as the overall street scene in general.

The applicant believes that the use of this property as an HMO would be a very appropriate use as the applicant is committed to providing a well-run, well-maintained HMOs. The applicant in particular makes the following points:

- The proposed change of use would provide much needed safe, high quality accommodation for working professionals.
- It meets a recognised housing need in a sustainable location.
- The use would be in keeping with the character of the surrounding area.
- It will continue to assist with creating a suitable housing mix (in accordance with the aims of national planning guidance).
- The applicant believes that by providing an HMO of this high standard they are complying with the aims of the legislation and setting a standard which will reflect

present and future local policies. Notwithstanding the information above and support of this application, the applicant would welcome any advice the Planning Department can give and will endeavour to satisfy any other planning criteria for the change of use approval.

The revised scheme has sought to address the initial concerns raised by the LPA and deal with them accordingly. Whilst the rear amenity space is less than the guidance, given the town centre location and proximity to significant areas of public open and recreational space (less than 200m), the 80% provision (of the guidance) is deemed acceptable upon balance. Through the proposed revisions, the applicant has taken reasonable steps available to minimise the shortfall in provision.