



## Planning Statement

To accompany a planning application

For the

**“Change of use from C4 (House of multiple occupation)  
to Sui Generis (Larger House of multiple occupation)  
(Retrospective), and the erection of a ground floor rear  
extension (Proposed)”**

at

**13 King George Vi Avenue,  
East Tilbury Essex RM18 8SL**

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## Introduction

1. This application follows a recent refusal for a similar proposal (23/00396/FUL). This application seeks to address the reasons for refusal.

## Planning History

2. On 25 May 2021, under planning ref: 20/01718/FUL Retrospective planning permission was granted for the Change of use from C3 (Dwellinghouse) to C4 (House of multiple occupation). Proposed two storey side extension and hardstanding.
3. On 29 June 2023, under planning ref: 23/00396/FUL, Retrospective planning permission was refused for the Change of use from C4 (House of multiple occupation) to Sui Generis (Larger House of multiple occupation)

## The Proposal

4. The proposal description is “Change of use from C4 (House of multiple occupation) to Sui Generis (Larger House of multiple occupation) (Retrospective), and the erection of a ground floor rear extension (Proposed)”.
5. This application is different to application ref: 23/00396/FUL in that it includes a ground floor rear extension in order to enlarge the communal area.

## The Decision Letter 23/00396/FUL

6. Given that this application seeks to address the reasons for refusal of planning ref: 23/00396/FUL, it is important to consider this in full.
7. The Decision notice Ref; 23/00396/FUL refusing planning permission is dated 29 June 2023. Four reasons for refusal are given. These are as follows,
  1. The change of use to a larger House of Multiple Occupation (HMO), Sui Generis use, by reason of its intensification of the use of the site by 8 persons in 8 individual households HMO, adversely impacts upon both the residential amenity and character of the area. Therefore the use is contrary to policies PMD2 and CSTP23 of the adopted Core Strategy 2015 and the National Planning Policy Framework 2021.
  2. The change of use to a larger House of Multiple Occupation (HMO), Sui Generis use, by reason of the inadequate and substandard level of bedroom space for Bedroom 7, and lack of adequate communal amenity space for all the occupiers of the property, results in an unacceptable living environment for the occupiers, contrary to policy PMD1 of the adopted Core Strategy 2015 and the National Planning Policy Framework 2021.
  3. The change of use to a larger House of Multiple Occupation (HMO), Sui Generis use, by reason of the increase to 8 persons living as 8 separate households, has resulted in unacceptable levels of noise, disturbance, vehicular and pedestrian movements detrimental to the neighbour amenities of the immediately surrounding neighbouring properties. This is contrary to policy PMD1 of the adopted Thurrock Core Strategy and Policies for the Management of Development (as amended) 2015 and the Residential Extensions and Alterations Supplementary Planning Document 2017.
  4. The change of use to a larger House of Multiple Occupation (HMO), Sui Generis use, by reason of the increase to 8 persons living as 8 separate

households, the associated likely increase in car ownership, and the inadequate provision of only one off street parking space, has resulted in the unacceptable migration of additional parking on the highway to the detriment of both pedestrian and highway safety and visual amenity, contrary to Policies PMD2 and PMD8 of the adopted Core Strategy 2015 and the NPPF.

## The Delegated Report 23/00396/FUL

8. The Delegated Report provides the reasoning behind the reasons for refusal. The report recognises that the property has planning permission (20/01718/FUL) and is in use as a 6 room HMO. However, the report considers that the increased number from 6 to 8 occupants,

represents a significant intensification of the use of the site that is likely harmful to residential amenity.

is also likely to result in increased vehicular and pedestrian movements as well as increased use of both internal and external amenity areas.

is likely to generate additional noise and disturbance.

would result in substandard accommodation. This is because the LPA considers that the kitchen area does not include living area, and therefore, room 7 at 7.41sqm falls short of the required 8.5sqm required where there is no shared living room.

9. In summary, the concerns raised are as follows,

The intensification is out of character (reason 1),

The intensification will cause noise disturbance (reason 3),

The intensification will cause increase in car ownership, and the inadequate provision of only one off street parking space (reason 4), and

Bedroom 7 will be substandard, and lack of adequate communal amenity space (reason 2).

## This Application

### The extension

10. Given its size and position, the proposed extension will not have any detrimental effect on the host or neighbouring properties in terms of character and amenity.

### The Use

11. Given that the change of use was considered in application ref: Ref; 23/00396/FUL, it is helpful to address this matter by reference to the reasons for refusal therein stated.

### Reason 1 and 3 – character and noise disturbance

12. Addressing the first two reasons first. It is the applicant's opinion that the intensification from 6-8 within this large 8 bedroom house will not be out of character and will not cause unacceptable noise disturbance.

13. The houses on this street are spaciouly spread out well spaced, and include large front and rear gardens.

14. Furthermore, the attached Transport Assessment concludes that in terms of Trip Generations,

“Based on the travel to work census data, there could be on average 1 to 2 additional departures by car and / or 1 by train during the weekday morning peak period (0700 – 1000), with the same number of arrivals during the weekday evening peak period (1600 – 1900); these levels of increases would not impact on levels of service nor the operation of the local highway network”.

15. In terms of Car Parking the report concludes the proposal would result in a maximum,

“of 2-3 additional deliveries per week which would not impact on the operation of the local or wider highway network, with many of the deliveries anticipated to be linked to another delivery in the local or wider area and as such not be a new trip.”

### Reason 4 – Transport

16. The delegated report for the previous refusal states,

With regard to parking needs for larger HMOs, the Local Planning Authority does not have any specific parking standards. However,

HMOs as defined under Class C4, for accommodation of no more than 6 people, are required to provide a minimum of 2 off street parking spaces. Planning approval 20/01718/FUL also conditioned the provision of 3 spaces. It is therefore considered appropriate that the site should provide the 3 spaces previously conditioned to ensure that at least the previously approved 6 bed dwelling could be appropriately served with parking. The provision of just the one space off street is highly likely to result in an increase in on street parking to the detriment of both highway and pedestrian safety and visual amenity. As the requirement to provide the 3 spaces and improve the access arrangements was previously conditioned but not submitted for condition discharge, nor implemented, at present, the use provides an inadequate level of off street parking provision and likely results in additional parking on the highway to the detriment of both pedestrian and highway safety and visual amenity, contrary to Policies PMD2 and PMD8.

17. The report makes it clear that this reason for refusal was based on the provision of only one off-street parking space. The report also makes it clear that for 6 rooms only two parking spaces is required, and three parking spaces would suffice for an 8 rooms.
18. The attached Transport Assessment concludes that there will be no highway impacts from the proposal.
19. Two charging points for cars will be provided in accordance with the policy requirements. Parking will be provided for up to 5 bicycles.

#### Reason 2 – Standard of accommodation

20. The delegated report states,

In line with the standards in Table 1, the HMO at present would be considered as having shared kitchen facilities but no shared living room, given the two shared amenity rooms at ground floor would make up to the 14 sqm needed for the shared kitchen facilities. Therefore, whilst it would appear that the majority of the rooms are of an appropriate size, bedroom 7 would have a floor area of 7.41smq including the bathroom area. This falls short of the 8.5 square metres required for a single bedroom.

21. The report makes it clear that if shared living space is provided, room 7 would be large enough. This proposal includes a ground floor rear

extension which will provide an enhanced internal layout and a larger area for kitchen and living.

22. In line with the standards in Table 1, for 8-10 occupants, a shared kitchen should be 14sqm, and a shared living/dining room should be 10sqm. In this case, the proposal will provide a shared kitchen/living/dining area of 24.5sqm. therefore, room 7, at 7sqm, is adequate. Furthermore, considering the size of all the other rooms, the property as a whole provides a good standard of accommodation.

## Plans

23. Given that the application is part retrospective and part proposed, three sets of plans are provided. Pre-Existing, Existing and Proposed, The plans include Floor, Section, Roof and Elevation Plans.

24. A location Plan, site plan and Planning Statement is also included in the application bundle together with the CIL additional information form.

## Conclusion

25. The development provides for much needed additional residential units. The proposal has policy support at National, London and Local level and the LPA is, therefore, respectfully asked to allow the appeal and to grant planning permission.