



# ET Planning

## Planning Statement

Client:

Tom Rourke

## 2 Sutton Road,

Headington, Oxford, OX3 9RB.

Change of use from a dwellinghouse (Use Class C3) to a large HMO (Sui-Generis) facilitated by the erection of a two storey rear and single storey side extensions with loft conversion.

Sam Pryor BSc (Hons)

Laura Callan M RTPI

---

[www.etplanning.co.uk](http://www.etplanning.co.uk)

CIL | Enforcement | Land Promotion | Planning | Sequential Tests | Viability

# Contents

1. INTRODUCTION	1
2. SITE LOCATION AND DESCRIPTION	2
3. PLANNING HISTORY	2
4. DEVELOPMENT PROPOSALS	2
5. POLICY ASSESSMENT	4
6. CONCLUSION	13

## 1. Introduction

- 1.1 This statement is produced to support a planning application for the change of use of the existing property from a residential dwellinghouse (Use Class C3) to a large, Sui-Generis House in Multiple Occupancy (HMO). The change of use will be facilitated by the erection of a two storey rear and single storey side extensions and a 'velux-only' loft conversion at 2 Sutton Road, Headington, Oxford, OX3 9RB.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will consider the proposal in light of relevant planning policies and other material considerations. The conclusion reached is that key material considerations and the wider objectives of National and Local planning policy support the grant of permission.
- 1.3 In addition to this planning statement, the application is accompanied by the appropriate planning application forms and ownership certificate, duly signed and completed, and the following documents prepared by The Plan Hub :
- 1:1250 Site Location Plan, drawing number 010, rev 01
  - 1:50 and 1:250 Bin and Bike Stores, drawing number 011, rev 01.
  - 1:100 Existing Elevations, drawing number 002, rev 00.
  - 1:100 Proposed Elevations, drawing number 006, rev 04.
  - 1:100 Existing Floor Plan, drawing number 001, rev 00.
  - 1:100 Proposed Floor Plan, drawing number 003, rev 03.
  - 1:100 Proposed Floor Plan, drawing number 004, rev 03.

- 1.4 The relevant application fee of will be submitted by the applicant separately.

## 2. Site Location and Description

- 2.1 The site is a two-storey, semi-detached dwellinghouse, located on the Northern side of Sutton Road, within the Headington area of Oxford. The character of the area is residential, comprising of terraced and semi-detached dwellinghouses with a similar built form and architectural styles to the application site with a modern apartment block to the South of the site.
- 2.2 The site currently does not offer off-street parking arrangements and is situated within the Northway Controlled Parking Zone (CPZ). The site is located within Flood Zone 1 resulting in a low probability of flooding. Additionally, the site is not located within the Green Belt or an AONB.

## 3. Planning History

- 3.1 No planning history at this site.

## 4. Development Proposals

- 4.1 The National Design Guide (2019) identifies that “well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences. They are adequate in size, fit for purpose and are

adaptable to the changing needs of their occupants over time” (para 120-121).

- 4.2 Regarding the requirements of NPPG Paragraph: 029 Reference ID: 14-029-20140306 in respect of Design and Access Statements, the proposal is described as follows:
- 4.3 **Use and Amount:** application is for the proposed change of use from a dwellinghouse (Use Class C3) to a large HMO (Sui Generis), facilitated by the erection of a two storey rear and a single storey side extensions with a rooflight-only loft conversion.
- 4.4 Bins will be provided on the site to facilitate the additional residential units in accordance with the Councils Amenities and Facilities Guide for Houses in Multiple Occupation 2019. This scheme seeks to make the most efficient use of the site and it is considered that the use and amount of development proposed is appropriate and acceptable.
- 4.5 **Layout and Scale:** The proposed development is 2.5 storeys in scale, with 5 ensuite bedrooms located on the ground floor alongside a spacious kitchen/diner area and utility. A further 3 ensuite bedrooms are located on the first floor as well and one bedroom sharing a bathroom with bedroom 10 being located in the loft space with a GIA of 9.9m<sup>2</sup> at 1.5m height.
- 4.6 The size of the bedrooms and relevant communal areas comply with national space standards and the Council’s local policy as discussed further in Section 5 of this report.
- 4.7 Bin stores are also provided to facilitate the additional units in accordance with the Planning Technical Advice Note: Waste bin storage and access requirements for new and change of use developments (2014) as well as cycle storage, both to the rear of the dwelling.

- 4.8 **Landscaping:** The application site benefits from a sizeable rear garden and the landscaping currently observed at the site would be protected and retained throughout the development.
- 4.9 **Appearance:** The proposed materials and finishes would match those existing which would ensure that the proposed alterations would integrate with the original dwelling well and confirm the character of the area. The single storey side extension will be offset from the principal front elevation of the property ensuring subservient relationship to the original part of the house.
- 4.10 **Access & Parking:** The proposed development would not be changing the original access point to the dwellinghouse. The proposal will not seek to alter the existing parking at the site and therefore is in keeping with the car-free standards that are set out in Policy M3 of the Oxford City Local Plan.

## 5. Policy Assessment

- 5.1 **National Guidance:** The National Planning Policy Framework (NPPF) is a relevant material consideration to the application.
- 5.2 The purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 38 of the NPPF states that "Local planning authorities should approach decision on proposed development in a positive and creative way" and "at every level should seek to approve applications for sustainable development where possible". Paragraph 119 of the NPPF comments that planning should "make effective use of land" in "meeting the need for homes and other uses, whilst safeguarding and

improving the environment and ensuring safe and healthy living conditions”.

- 5.3 Paragraph 60 confirms the Government’s objective to boost the supply of housing, and paragraph 8 identifies the three objectives of sustainable development, as economic, environmental and social.
- 5.4 Paragraph 126 identifies that “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”, whilst paragraph 134 states that significant weight should be given to “outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
- 5.5 The National Design Guide builds on the above, and clarifies that “well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities. New development reinforces existing places by enhancing local transport, facilities and community services, and maximising their potential use” (para 109).
- 5.6 **Principle of Development:** Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.7 All planning applications should be dealt with in accordance with the relevant development plan policies unless material considerations indicate otherwise. The NPPF is a material planning consideration in all planning applications. In this instance, the relevant development plan documents include:

- Oxford Local Plan 2036 (Adopted June 2020)
- Landlord’s Guide to Amenities and Facilities for Houses in Multiple Occupation 2019.

5.8 The conversion of a dwelling into an HMO is acceptable in principle, subject to complying with Policy H6 of the Local Plan 2036. Policy H6 states that new HMOs (small; C4 or large; Sui Generis) would only be permitted where:

- 5.9
- a) The proportion of buildings used in full or part as an HMO within 100 metres of street length either side of the application site does not exceed 20%; and
  - b) The development complies with the space standards set out in Policy H15; and
  - c) The development complies with the City Council’s good practice guidance on HMO amenities and facilities, or any equivalent replacement document.

5.10 With respect to H6(a), the 20% rule, a review of the Council’s HMO license register reveals that there are circa 44 properties within 100 of the application site, 3 of which are registered HMOs giving it an existing saturation rate of 6.8%, including 2 Sutton Road. Therefore, this proposal would be well below the 20% saturation rate of HMOs and would be acceptable in principle.

5.11 **HMO Requirement:** The proposed development would allow for 10 bedrooms at the property. The space standards within the proposed HMO would comply with the legal requirements and Oxford City Council requirements as set out in the Council’s Amenities and Facilities Guide for Houses in Multiple Occupation 2019.



- 5.12 All bedrooms would meet and significantly exceed the space requirements for a single occupant (6.5m<sup>2</sup>) with room sizes ranging from approximately 8.5 – 10.4m<sup>2</sup> with the loft room being 9.9m<sup>2</sup> and above 1.5m ceiling height. It should be made clear that the bedrooms would be let to tenants on a single occupancy basis only and therefore only a maximum of 10 tenants would occupy the property.
- 5.13 As per requirements for all HMOs, an electrical installation inspection must take place every five years by a qualified electrician. This can be provided on request.
- 5.14 All fire safety requirements will be met within the property including mains wired smoke alarms with battery back up, a wall mounted fire blanket, specific doors to meet lock and fire restraint (FD30) standards where applicable as well as FD30 built cupboards, ceiling and structure when required.
- 5.15 A mandatory licence for the use as an 10 bed HMO will need to be obtained for the property through the Local Authority's services.
- 5.16 Accordingly, the proposed large HMO shall accord with the requirements for HMOs and is therefore, acceptable in this regard.
- 5.17 **HMO Occupancy:** The proposed HMO bedrooms would be on a single occupancy basis only; to a total of 10 occupants. When assessed against National Space Standards, as indicated below, the proposed comfortably complies:

**Table 1 - Minimum gross internal floor areas and storage (m<sup>2</sup>)**

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

- 5.18 **Character and Appearance of the Area:** Policy DH1 of the Oxford Local Plan ensures high quality design that creates or enhances local distinctiveness.
- 5.19 The proposed extensions are moderate in terms of scale and footprint, and commensurate with the built form, massing and footprint of that of the current property. The proposed extensions will make effective use of the area to the side of the plot that was previously unused. The proposed side extension would be set back from the main front elevation of the property resulting in a moderate and subservient addition to the host dwelling.
- 5.20 The formalisation of the change of use of the dwelling to a 10-bedroom HMO would not significantly impact on the character or appearance of the area. The rear extension will not exceed the building height of the existing property, resulting in a finished built form that is in keeping with the original dwelling and the rest of the surrounding area.
- 5.21 The majority of materials used in the construction of the side and rear extension will match the existing with regards to the external brickwork on the ground floor and first floor as well as the roof tiles,

ensuring that the proposed side extension integrates well with the original dwelling. This high quality of design is in keeping of Policy DH1 of the Oxford Local Plan 2036.

- 5.22 The proposed loft conversion would involve mainly internal changes, except for three new rooflights, therefore would have a minimal effect on the character of Sutton Road and the street scene. As a result, the proposed development is compliant with Policy DH1 of the Oxford Local Plan.
- 5.23 Therefore, all the proposed extensions to the property are considered to be in keeping with the property whilst allowing for a more efficient use of the plot through the sensitive expansion to create additional accommodation space to the original dwellinghouse. This proposal is subsequently considered to be compliant with Policy H1 point b of the Oxford Local Plan 2036 as it seeks to make efficient use of the site.
- 5.24 **Residential Amenity:** Policy H14 of the Local Plan sets out the requirement with regards to privacy, daylight and sunlight. The proposed side extension will be in keeping with the original dwellinghouse whereby there is a window on this elevation of the property, however it is located only on the ground floor or the building, which is beneficial for neighbouring amenity.
- 5.25 The orientation of the new windows on the proposed extensions will be in the same orientation as the existing therefore daylight and solar gain would not be an issue. The proposed walls are not directly on a boundary wall with another property with ample separation distances to neighbouring properties. As a result, overshadowing would not be an issue with this proposal and the scheme is compliant with Policy H14.

- 5.26 Policy H6 requires HMO development to comply with the space standards set out in Policy H15, which is to provide good quality living accommodation in accordance with the Department for Levelling Up, Housing and Community's (formally the Ministry of Housing, Communities and Local Government) Technical Housing Standards.
- 5.27 Policy H15 sets out provisions with regard to the internal space standards. The proposed development shall meet and exceed the internal space standards required for HMOs and is therefore considered to be acceptable in this regard. With specific regard to the Council's Landlord Guide to HMOs (2019) all the bedrooms achieve the required internal space. As all bedrooms are 8.3m<sup>2</sup> and above, and the proposal exceeds the minimum 10m<sup>2</sup> kitchen size with a 27m<sup>2</sup> kitchen/diner space. This is therefore compliant with the requirements set out on page 7 of the SPD for a three storey HMO development.
- 5.28 Occupants of the HMO would also be offered access to a shared garden space at the rear of the property, the size of the two is ample and together exceeds the guidance of being at least equivalent to the footprint of the building, and therefore is compliant with Policy H16 regarding to outdoor amenity space standards.
- 5.29 Given the above, it is considered that future occupants of the property would be offered a high standard of living, with quantity and quality of accommodation to be provided far in excess of the required minimum standards. Such proposal would therefore fully comply with Policies H6, H14, H15 and H16 of the Local Plan.
- 5.30 With regards to the neighbouring amenity, the property benefits from being semi-detached and is situated within a sizeable plot. This results in the property having a reasonable separation distance between itself and neighbouring dwellings to the East. The layout of

the property is beneficial to the neighbours as the main communal area is located to the rear of the HMO. This will in turn limit the noise produced from the property, thus complying with Policy RE8. The nature of the tenants being young professionals would also reduce the noise generated from the property as opposed to student housing which again, benefits the neighbouring amenity and complies with Policy RE8.

- 5.31 **Trees and Landscaping:** The proposal will utilise existing landscaping at the site, and this is considered acceptable.
- 5.32 **Transport and Parking:** The site is located within Northway Controlled Parking Zone. The proposal does not seek to add any parking on the site and therefore adheres to the car-free standards that are set out in Policy M3 of the Oxford City Local Plan. No additional parking is necessary, given the site is located within walking distance of frequent bus routes along Westlands Drive.
- 5.33 **Cycle and Refuse Provision:** Adequate facilities for refuse and recycling provision would also be provided to the rear of the property in accordance with the Council's standards outlined in the Amenities and Facilities Guide for Houses in Multiple Occupation 2019.
- 5.34 Suitable cycle storage will be provided to the rear of the property for occupiers as part of the development proposal. This can be secured through condition in the grant of any planning permission.
- 5.35 **Drainage and SuDS:** The site lies in Flood Zone 1 which carries the lowest risk of flooding and as such a Flood Risk Assessment is not required.
- 5.36 **Sustainability and Energy:** Paragraph 8 of the NPPF supports the transition of development to a low carbon future. The national Code for Sustainable Homes has now been abolished, however it is

proposed that the development would conform to Part L of the Building Regulations which as of 2022 requires a 30% reduction than current standards. By way of contributing to the reduction in carbon, the proposal would also achieve current building construction standards with added sustainability measures through;

- A. The limitation of the amount of inherent material, structure and embodied energy through the employment of good building standards to create an excellent SAP rating;
- B. Use of locally sourced, recycled materials and labour where practicable;
- C. Reduced internal water consumption of 110 litres per person per day through the incorporation of water efficient sanitary fittings, including low flow toilets and water efficient taps for wash basins;
- D. Refuse, recycling and composting facilities to be provided to work with the Council's existing waste and recycling collection service;
- E. Secure cycle provision to encourage sustainable modes of transport;
- F. 'A' rated electrical appliances and energy saving light fittings;
- G. 'A' rated double glazed windows with natural cross ventilation provision;
- H. Recycling of waste construction materials where practicable;

5.37 The proposal is therefore considered to comply with sustainability objectives in this respect.

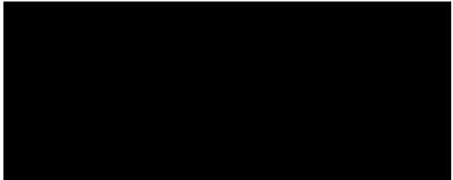
5.38 **Community Infrastructure Levy:** The relevant forms have been completed and submitted with this application.

## 6. Conclusion

6.1 This statement has demonstrated that the proposed development is acceptable in principle and makes an efficient use of land.

6.2 Material planning considerations have been carefully considered and analysed, as evidenced in section 5 of this statement and the supporting plans and documents. It is considered the proposed development would not cause any adverse effect on the character of the area or the amenity of neighbouring residents.

6.3 It is considered that the proposed scheme complies with relevant Development Plan Policies and is further supported by National Guidance. Therefore, it is respectfully requested that planning permission is granted.



**Laura Callan MRTPI**

Associate Director | ET Planning

200 Dukes Ride Crowthorne RG45 6DS

[laura.callan@etplanning.co.uk](mailto:laura.callan@etplanning.co.uk) 01344 508048



**Sam Pryor BSc (Hons)**

Planner | ET Planning

One St Aldates Oxford OX1 1DE

[sam.pryor@etplanning.co.uk](mailto:sam.pryor@etplanning.co.uk) 01865 507265





| CIL  
| Enforcement  
| Land Promotion  
| Planning  
| Sequential Tests  
| Viability

## Contact


### Address

200 Dukes Ride RG45 6DS  
One St Aldates OX1 1DE  
32 London Road GU1 2AB  
14 The Square SY1 1LH

### Phone

01344 508048  
01865 507265  
01483 363950  
01743 612043

### Web & Mail

Email:   
ET Planning Ltd | 10646740  
Web: [www.etplanning.co.uk](http://www.etplanning.co.uk)