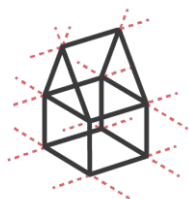


# Planning Statement

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**COMPLETE**  
**PLANNING**

# 1 and 3 Holland Road, Felixstowe, IP11 2BA

## Introduction

Change of use from C1 Hotel to Sui generis (House of Multiple Occupation)

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## 1. Planning History

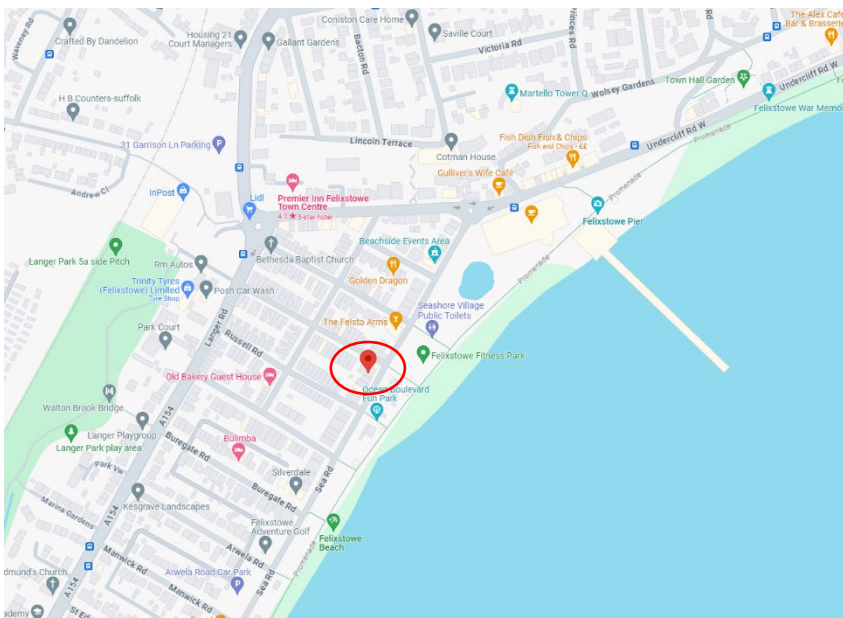
No relevant planning applications associated with this property.

## 2. Site Appraisal. Including photos, maps, surroundings and local information.

Location (Google Maps)



## Central Felixstowe Location

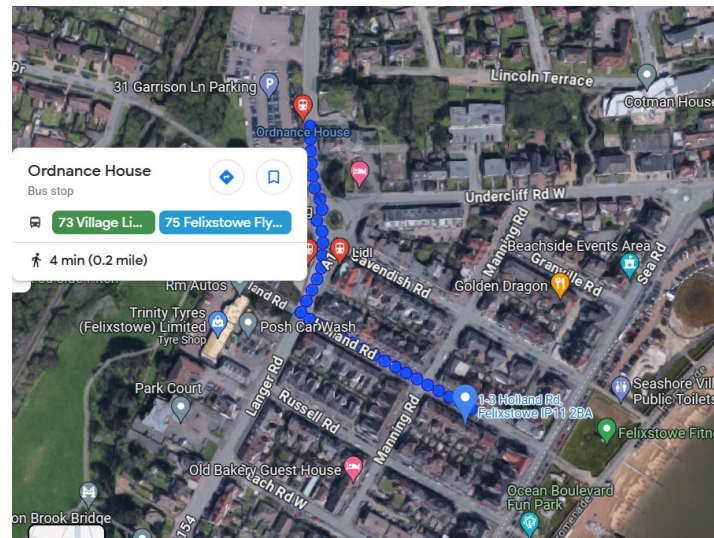
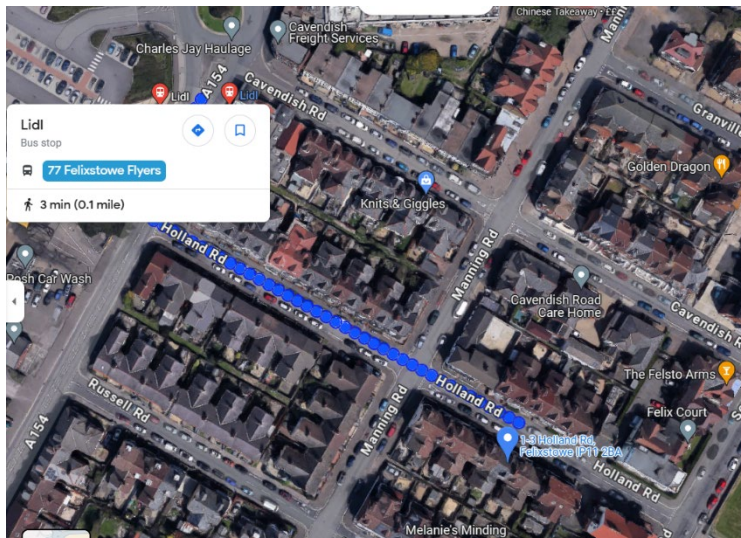


## Information

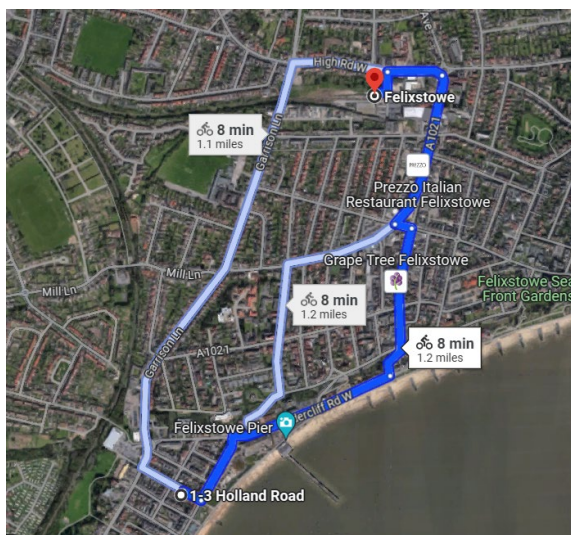
1 and 2 Holland Road is currently used as a guest house in highly sustainable transport area in the centre of Felixstowe. The nearest public transport is located just 0.1m away on the next road and the train station being just a 8 minute bike journey away. Budgens is the nearest supermarket at 0.2m away.

## Nearest Public Transport

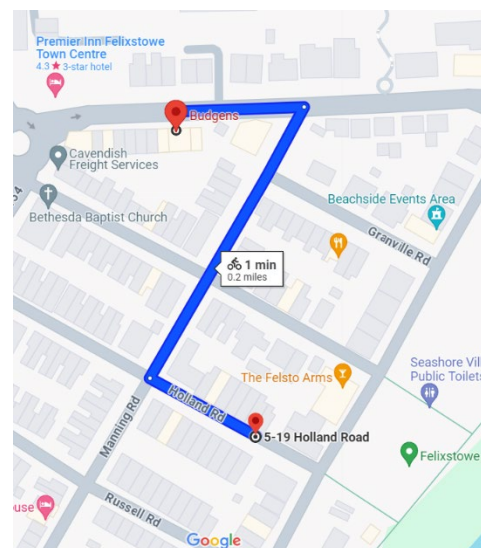
### Bus Stops



### Train Station



### Nearest Supermarket (Budgens) 0.2m away



Site Photos



### 3. Proposal.

#### Introduction

- 1&3 Holland Road is currently used a 15 bedroom guest house located in the centre of Felixstowe
- This planning application is for the change of use from C1 Hotel to Sui generis ( House of Multiple Occupation)
- The existing guest house/ hotel currently has 15 guest rooms each with ensembles and we are looking to change the number of ensuite rooms by 1 to 14.

#### External Changes

- We are not seeking to change the external appearance of the property
- Bin and Cycle Storage located in rear garden.

#### Internal Changes to Ensure Compliance.

- Please see architectural drawings attached to this application for further details on room layouts and sizes and the living room/ kitchens we have provided. We have followed East Suffolks HMO guidelines below to ensure compliance

#### East Suffolk HMO Guidelines

##### **Guidance on Space Standards**

All licensable HMOs have to comply to the National minimum room size. The following space standards will be required in HMOs. We recommend that you consider these standards when buying houses to let or when improving existing HMOs.

If a room is smaller than the minimum acceptable size, a legal notice shall be served on the landlord, either prohibiting the use of the room or limiting the number of people who may occupy it. This does not mean that the tenant who currently occupies the room has to leave, but when they do leave the landlord must not re-let the room.

##### **Bedrooms**

The following space standards will be required in all HMOs:

Minimum bedroom size with separate living room (**11m<sup>2</sup>**):

- **1 Person—6.51m<sup>2</sup>**
- **2 Persons—10.23m<sup>2</sup>**

Minimum bedroom size study/living room where there is **no** separate living room

- **1 person—10m<sup>2</sup>**
- **2 persons—15m<sup>2</sup>**



##### **Living room**

Minimum living space

- **1—5 persons—11m<sup>2</sup> OR 13m<sup>2</sup> combined kitchen/dining room**
- **6—10 persons—14m<sup>2</sup> OR 16.5m<sup>2</sup> combined kitchen/dining room**

Unless related, persons should not be required to share bedrooms. It is accepted, however, that some groups may wish to share rooms.

## Planning Statement

### Planning Policies;

The development plan for the East Suffolk Council is the ‘East Suffolk Council- Suffolk Coastal Local Plan (Adopted September 2020) Local Plan’. Relevant policies will be referred to throughout the report where relevant. The updated National Planning Policy Framework are material considerations in relation to this application. The updated National Planning Policy Framework along with the Planning Practice Guidance are also material considerations.

### National Planning Policy Framework

#### *Paragraphs 7 to 14*

*7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs 4 . At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection 5 .*

*8. Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*

- ❖ The importance of the Port in Felixstowe is explained in the local plan and states it is fundamental that the operations of the Port of Felixstowe are maintained and economic opportunities realised. To ensure this happens, good quality, suitable accommodation are needed to be available to support the work at the port.
- ❖ Increased revenue for the local government through increased council tax receipts.
- ❖ Building works and future maintenance of the HMO will provide jobs and work for local businesses.

*a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

- ❖ *The proposal will provide good quality, modern rooms and facilities for the local community and will likely attract young professionals to the area, looking for jobs in the centre of town or Felixstowe Port. All our proposed room comply with East Suffolks HMO room size guidelines sizes and all bedrooms have ensembles, these rooms will provide a private and safe living environment for the residents.*

*an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

- ❖ *The site is located in a highly sustainable transport area. As shown via google maps above the need for a car is not essential. The property is currently being used as a guest house, which in theory would put a higher burden on parking than an HMO as guests visiting will more likely drive than a tenant of an HMO who knows the local public transport routes. The proposal would promote sustainable growth in the area through providing good quality rooms to rent for professionals working in central Felixstowe or the port, who would spend in the local economy. Due to high density of public transport and shopping facilities on the sites doorstep the residents would not likely use a car, single rooms would also not attract families who would have increased need for a car for larger grocery shops or school runs. The single rooms would attract young professionals, likely at the port, who would pick public transport*

*over private cars for commuting etc. As explained below in more detail the local plans put an emphasis on providing suitable accommodation for younger residents wishing to stay in Felixstowe. The local plan also promotes sites which encourages sustainable transport modes. With its central location and enviable sustainable transport modes, 1&3 Holland Road is a prime example of a development which can obtain this level of sustainability.*

*9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*

*10. 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 11).*

*The presumption in favour of sustainable development*

*11. Plans and decisions should apply a presumption in favour of sustainable development.*

*For decision-taking this means:*

*(c) approving development proposals that accord with an up-to-date development plan without delay; or*

*(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date 8 , granting permission unless:*

*(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

*12. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.*



## East Suffolk Council- Suffolk Coastal Local Plan (Adopted September 2020) Local Plan

Felixstowe has a clear plan on how it is looking to achieve its future goals as the largest town in the former Suffolk Coastal area. The importance of the Port in Felixstowe is explained in the local plan and states it is fundamental that the operations of the Port of Felixstowe are maintained and economic opportunities realised. To ensure this happens, good quality, suitable accommodation are needed to be available to support the work at the port.

*'The Port of Felixstowe and businesses associated with the port provide a significant amount of employment opportunities and this is seen in the high volume of commuting flows into the town. Over the plan period, it is fundamental that the operations of the Port of Felixstowe are maintained and economic opportunities realised'*

Whilst there is a need in Felixstowe for accommodation for elderly residents the local plans makes a point that there is also a need for suitable accommodation for a younger generation who wish to continue to work in the local area. Younger residents are more likely to want high quality 1 bedroom living spaces, with their own private ensuites, in the centre of town, close to employment opportunities, restaurants, pubs and public transport. They are often more conscience about climate change and sustainable approaches to living, meaning they are less likely to use a car and would opt for sustainable transport modes such as a bus or bike. Our client is looking to provide all of this through 14 high quality HMO rooms in the centre of Felixstowe. As we have seen through the google maps above, 1&3 Holland Road is in a highly sustainable area for transport and close to numerous shops and employment opportunities in central Felixstowe and the port.

## 5 Housing

5.1 This Local Plan sets a housing requirement of 542 dwellings per annum over the period 2018- 2036 (9,756 in total). As at 31st March 2018, 6,998 dwellings are already under construction, permitted or allocated, and, with a contingency applied to allow flexibility, the policies and allocations in this plan seek to ensure that this requirement is met. The residual need to be met is 2,758 dwellings (before a contingency is applied).

5.2 The strategy in this Local Plan focuses on supporting economic growth and the provision of infrastructure, and alongside this, sets out ambitious plans for increasing the supply of housing. Integral to this is ensuring that the Plan supports existing infrastructure and services particularly in the more rural parts of the plan area. Addressing the need for more affordable housing and housing to meet the needs of an increasingly elderly population is another key objective. Accordingly, in addition to delivering an ambitious housing requirement, the Local Plan seeks to diversify the supply of housing through delivering a range of different sizes of sites in a variety of locations, and ensuring that the mix of housing types and tenures reflects the needs of the plan area's population. The East Suffolk Housing Strategy also sets out the ways in which the Council will continue to pursue a range of models for housing delivery, including through working with Housing Associations and providing support to community led housing initiatives.

5.3 The amount of housing needed is covered in Section 3 of this Local Plan. Allocations for housing development and the approach to housing provision in the Major Centres and Market Towns are contained in the settlement and area specific Sections of this Local Plan in Section 12.

5.36 In addition to ensuring a supply of housing land, it is also necessary to ensure that the right size, type and tenure mix of housing built is delivered. The National Planning Policy Framework requires planning authorities to identify the size, type and range of housing required and, furthermore, the National Planning Practice Guidance states that once identified, the housing need should be broken down by household size and type. Specifically, the National Planning Policy Framework requires local planning authorities to plan for a mix of housing including the needs of families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes.

5.37 The Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (2017) (SHMA) is a key piece of evidence which identifies the needs for mix and type of housing across the District to 2036.

5.38 The SHMA provides conclusions on the size of property needed in each tenure for the former Suffolk Coastal District as a whole, and this part of the SHMA has been updated in 2019 to reflect the disaggregation of the housing need figure

calculated using the national standard methodology. Evidence shows that this varies between tenure, but that overall there is a need for all sizes of property and that across all tenures there is a need for at least 40% to be 1 or 2 bedroom properties. Consultation feedback suggests a relatively high level of demand for smaller properties, particularly those to meet the needs of first time buyers or those looking to downsize. At present, around 30% of all properties in the plan area are 1 or 2 bedrooms, and therefore the need for 40% of new dwellings over the Plan period should not be underestimated. To ensure that smaller properties are delivered, and in particular recognising the issues around affordability and the potential demand for properties for downsizing due to the ageing population, a particular focus on smaller properties has been identified. It should be noted that the requirements in Table 5.1 below relate to need across the former Suffolk Coastal District. It is acknowledged that, depending on the character of the surrounding area, some sites may present a greater opportunity to secure smaller properties and consideration will therefore be given to surrounding densities and character in this respect.

**The section above 'there is a need for at least 40% to be 1 or 2 bedroom properties. Consultation feedback suggests a relatively high level of demand for smaller properties'. Our proposal will bring an additional 14, 1 bedroom room, good quality rooms all with ensuites to the local area which the local plans states is of importance. These 1 bedroom rooms will be in a highly sustainable transport area with extensive shopping and public transport facilities on its doorstep.**

5.39 In the former Suffolk Coastal District the number of households in private rented accommodation has increased by 35% between 2001 and 2011. Whilst this increase is lower than that of surrounding authorities, it nevertheless highlights a growing need for rental properties. The SHMA concludes that 16% of housing need to 2036 is for private rented properties.

**Our proposal is looking to add 14 new private HMO rooms to the area. These will be good quality, ensuite rooms, which would not only serve the needs of Section 5.38 of the local plan by being 1 bedrooms but also 5.39 but providing additional rental properties in the area.**

Policy SCLP5.8: Housing Mix

Proposals for new housing development will be expected to deliver the housing needed for different groups in the community as identified in the Strategic Housing Market Assessment, or latest equivalent assessment.

New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms).

**The proposal meets this criteria as will by providing high-quality 1 bedroom dwellings, each with their own en-suites, ensuring the aims and goals of the local plan are met.**

Houses in Multiple Occupation

5.73 Houses in Multiple Occupation (HMOs) which fall within Use Class C4 are defined as 'small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.' Change of use between Use Class C3 and C4 is 'permitted development', although permission may be required for related works so the advice of the Council should be sought. Larger HMOs are classed as 'sui generis' and will require planning permission for change of use. Licenses are also required for all HMOs of 5 or more individuals comprising 2 or more households.

5.74 Proposals for conversion to HMOs usually occur within residential areas in the more urban parts of the plan area. HMOs present issues that distinguish them from residential dwellings (Use Class C3) through the need for additional features including parking areas, bin storage, accesses and windows. Due to the nature of use of such properties, they are usually most suited to locations where there are a good range of services and access to public transport. This is particularly important in relation to parking provision and opportunities to access jobs and services by public transport or by walking or cycling. These will be key considerations where there is insufficient scope for appropriate on-site parking.

Policy SCLP5.12: Houses in Multiple Occupation

Proposals for Houses in Multiple Occupation will be supported within Settlement Boundaries where:

There is no adverse impact on the character of the dwelling or the surrounding area;

Provision can be made for sufficient parking and where the dwelling is, or can be made to be, accessible to public transport services and main employment and service centres on foot and by cycle; and

Any extensions necessary are in accordance with the Council's design policies.

Our proposed HMO site is located in a highly sustainable transport location, as shown in the statements above. 1 Holland Road is 0.1m from a bus stop, 0.2m from the nearest supermarket, close to Felixstowe main line station. The dwelling is also an easy walk 0.1m from the waterfront and 0.2m from the Pier which are also good areas for employment opportunities. These factors make it ideally suited for an HMO.

The property is currently being used as a guest house in central Felixstowe, the nature of a guest house, with new guests coming and going on a regular basis, puts more pressure on the local services, more likely for anti-social behaviour, noise and nuisance issues than an HMO. With visitors coming and going more to a guest house than an HMO the current guest house residents are more likely to use private cars than an HMO with HMO residents more invested in the local economy and will more likely have a local job and will be able to use the easy to access public transport. The change of use to an HMO will likely ease the pressure upon parking provisions in this area.

All rooms will meet East Suffolk/ national guidelines for HMO room sizes as stated above. They will also meet all other relevant HMO guidelines as well.

The guest house is currently providing residential accommodation in the form of long term guest house lets to the local area, showing that the site is suitable for residential purposes, however, the property is not being properly utilised in this form. If planning is granted for change of use into an HMO then the dwelling will be able to provide a better quality of accommodation for local residents.

#### Cycle Storage, Bin Storage and Parking.

As explained above the property is in a highly sustainable transport area with shopping and employment opportunities within in close walking distance. Also the nature of the existing guest house has a higher reliance on private car usage than an HMO does, so providing more parking is not required. We have provided secure cycle storage to the rear of the property at the rate of 1 cycle per room. Bin storage is also located at the rear of the property as well to meet compliance.

## HMO Management Scheme

Our client is an experienced and professional commercial landlord, having managed multiple HMO's in the past. They currently have HMO's located in Ipswich and the surrounding areas of Suffolk, which they also manage. On top of managing HMO's they run a successful business managing other buy to let properties and a construction management business making them well suited to the running and management of this proposed HMO.

Our client as an experienced HMO landlord would ensure the HMO is well managed and would ensure the following are effectively/ responsibly managed;

1. **Bin Storage.** – Suitable bin storage and recycling will be provided on site for the relevant number of occupants, this will be managed by the client.
2. **Cycle storage** – Secure bike storage will be provided on site in the rear garden.
3. **Cleaning and maintenance.** – Upkeep and maintenance of communal areas on a regular basis, including upkeep of external areas i.e the front/rear garden.
4. **Safety and security.** – The dwelling will be routinely inspected to ensure fire safety is kept UpToDate along with all other relevant building regulations.

None of the maintenance responsibilities shall fall to the future occupiers of the site. All site management and maintenance shall fall to the applicant landlord.

## Construction Management Statement

- **Asbestos:** Should any asbestos containing materials be present on the development site, or used within the original construction of the building in question, it must be safely removed by a qualified contractor, with relevant transfer notes being obtained to confirm safe and responsible removal and disposal.
- **Construction Activities:** In order to minimise potential nuisance caused by demolition/construction works, We recommend that the following hours and actions be adhered to, should the application be approved;
- No vehicle connected with the works to arrive on site before 07:30 or leave after 19:00 (except in the case of emergency). Working hours to be restricted between 08:00 and 18:00 Mondays to Saturdays, 10am-3pm on Sundays with no working of any kind permitted on any Public/Bank Holiday whilst construction works and alterations are being carried out.
- No materials produced as a result of the site development or clearance shall be burned on site.