

19 February 2024

Dear Sirs

Planning, Design and Access Statement

Description of Development: Retention of external front elevation comprising altered window arrangement to first floor, reduced no. of windows to east elevation and internal partition of large 38m² (409ft²) kitchen/diner/sittingroom to create an additional 16.9m² (182ft²) bedroom plus ensuite and other minor internal alterations (amendment to planning permission ref: 21/502267/Ful) and from an existing 6 person HMO (Use Class C4) to change the use for occupation by 12 people (Use Class Sui Generis).

Location: 23A Thomas Road, Sittingbourne, ME10 3AN

- 1.0. The existing dwelling is currently occupied by six people living as one household.
- 2.0. This use is permitted under Use Class C4 of the Town & Country Planning Use Class Order 1987 (as amended), having converted from Use Class C3 via Part 3 (Changes of Use) of the Town & Country Planning General Permitted Development Order 2015 (as amended). These regulations relate to numbers of people not the number of bedrooms.
- 3.0. The property has full Building Regulations approval, space standards significantly exceed nationalⁱ and localⁱⁱ HMO standards and is licensed as a 6 person HMO by Swale Borough Council Housing Dept.
- 4.0. Swale Borough Council's Adopted Local Plan Policies (2017) provide for sustainable development, of which HMOs are a component part in providing local housing.
- 5.0. The owner and operator of the property is a local residential landlord that refurbishes existing buildings to a high quality of finish and environmental performance and rents out dwellings and Houses of Multiple Occupation in the Swale and Medway areas.
- 6.0. Demand is high and there is a shortage of rented rooms for couples in shared accommodation in Sittingbourne. The landlord and applicant has received an overwhelming demand for couples to rent out his rooms in this and his other properties.
- 7.0. The rooms at No. 23A Thomas Road are recently refurbished, being created from a former industrial workshop, and are very large for single occupancy. En-suite bathrooms are in every room and each has a small tea station for making hot drinks. The shared kitchen for the entire household is fully fitted with all facilities required of a kitchen and with access to the rear garden.

Ground floor	Room 1: 17.5m² (188ft ²)	Room 2: 16.9m² (181ft ²)	Kitchen: 14.8m ² (159ft ²)
First Floor	Room 3: 23.3m² (250ft ²)	Room 4: 26.5m² (285ft ²)	Room 5: 24m² (258ft ²)
Second Floor	Room 6: 17m² (182ft ²)		

- 8.0. The National minimum standard size for a sleeping/ sitting room is **10.22m²** (110ft²) for 2 persons.
- 9.0. Swale Borough Council seeks higher standards at **14m²** (150.6ft²) for 2 persons and No.23A complies with the other detailed local requirements.

- 10.0. Table 1 shows significantly larger room sizes in 23A than national and local minimum sizes.
- 11.0. The original commercial building had a floor area of 273m² (2938.55ft²) and with selective demolition to create parking at the front for one car and one motorcycle has resulted in the current permitted floor area of 222m² (2392ft²). No.23A is no exception to the common rule of low/no car ownership within HMOs.
- 12.0. As promised in the original application, the applicant has addressed the historic anomaly of the shared water supply within the building. The current pipework is now upsized and No. 23A is separated out so that all properties in the terrace now benefit from complete control over their own water supply.
- 13.0. The energy rating of the building has been significantly upgraded from the previously solid wall commercial building to an EPC rating of 'B'. By comparison, 3 out of 4 dwellings in the UK have an EPC rating of 'D' or less, with the average Victorian aged dwelling being rated at 'E'. The govt. is aiming for as many properties as possible to achieve an EPC rating of C by 2035ⁱⁱⁱ.
- 14.0. Aside from the fenestration change to the front of the dwelling the existing windows to the sides have been reduced in number and size.
- 15.0. First Homes^{iv} is a government initiative, launched 2010 and updated in 2023, to provide discounted homes to first time buyers in England on new developments. A first homes policy is being drafted as part of the Swale Borough Local Plan process which will set out eligibility criteria.
- 16.0. HMOs are considered to have a strong role in providing a stepping stone to people prior to getting onto the ladder of private home ownership.

I trust this information is sufficient to enable Swale Borough Council to grant planning permission for this proposal.

Please contact me for any further information.

Yours sincerely

C. B. Wright

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ⁱ Ministry of Housing and Local Govt. 'Houses in Multiple Occupation and residential property licensing reform Guidance for Local Housing Authorities' published 2018

ⁱⁱ Swale Borough Council 'HMO STANDARDS FOR SHARED HOUSES/FLATS, SELF CONTAINED FLATS, HOSTELS AND BEDSITS' Version 3 dated 26/3/2014

ⁱⁱⁱ <https://www.thisismoney.co.uk/money/mortgageshome/article-10191013/Britains-Victorian-housing-stock-values-plummet-government-introduces-EPC-regulation.html>

^{iv} <https://www.gov.uk/first-homes-scheme#:~:text=Selling%20the%20property-,Overview,called%20the%20First%20Homes%20scheme.>