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Design & Access/ Planning Statement

31 Grosvenor Street, Prestwich, M25 1ES

Image by Freepik

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Introduction

1. This design and access/planning statement supports a planning application submitted by GMPE Property Ltd [*'the applicant'*] for the change of use of 31 Grosvenor Street, Prestwich, M25 1ES [*'the property'*] from a dwellinghouse (Use Class C3) to a 10-bed space, large House in Multiple Occupation [*'HMO'*] (sui generis including changes to the fenestration of the pool building and the installation of two dormer windows to the rear roof slope [*'the proposal'*]).

Summary

2. This statement will demonstrate that the proposal will accord with the most important local and national policies and the Supplementary Planning Document [*'SPD'*], PPG13, Conversion of Buildings into Houses in Multiple Occupation (Bury MBC, May 2007).
3. This is considered a sustainable form of development that does not conflict with local and national planning policy that the Council would be justified in approving without delay.

Planning History

4. The Council granted planning permission to erect a swimming pool building on the property on 28 May 1992, reference 92/27174 and a conservatory extension to the proposed swimming pool on 3 May 1994, reference 94/29646.

Proposal

5. It is proposed to change the use of the property from a dwellinghouse, Use Class C3, and its incidental swimming pool building to a large HMO (sui generis).
6. There will be a functional and, to an extent, physical link between the main and pool building, although no interlink extension is proposed.
7. Permitted development rights to change the use of a Class C3 property to a Class 4 small HMO have not been removed by an Article 4 Direction.
8. Accordingly, we must examine the genuine '*fallback*' position against which the proposal should be considered as a material planning consideration, and that is a small HMO (Use Class C4) occupying six people.
9. It is proposed to install two pitch-roofed dormer windows on the east roof slope of the property to facilitate the use of the loft space as habitable accommodation.

10. It is also proposed to change the fenestration of the conservatory extension of the pool building.
11. The property will accommodate ten people, each with a single-occupancy bedroom. This represents a net gain of four occupants from the fallback position.
12. The end users may be students. They may not. More mixed HMO markets are forming, including social groups such as young professionals, international migrant workers, low-skilled workers, benefit recipients and divorcees.

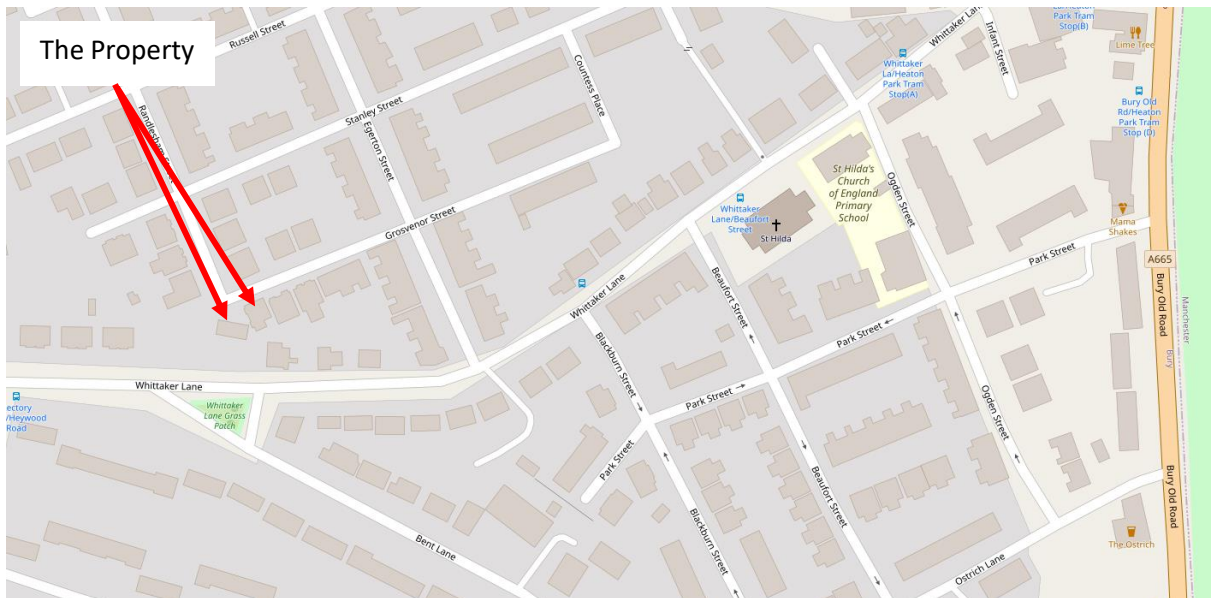


Fig.1 - Mapping - The property in its wider setting (Source: OpenStreetMap)

Location

13. The property is east-northeast of Prestwich town centre in the Sedgley Ward.
14. It is located at the west end of Grosvenor Street as it turns into Renslesham Street and is on the south side.
15. The property is unallocated land on the UDP proposal map, and the area is predominantly in residential use.

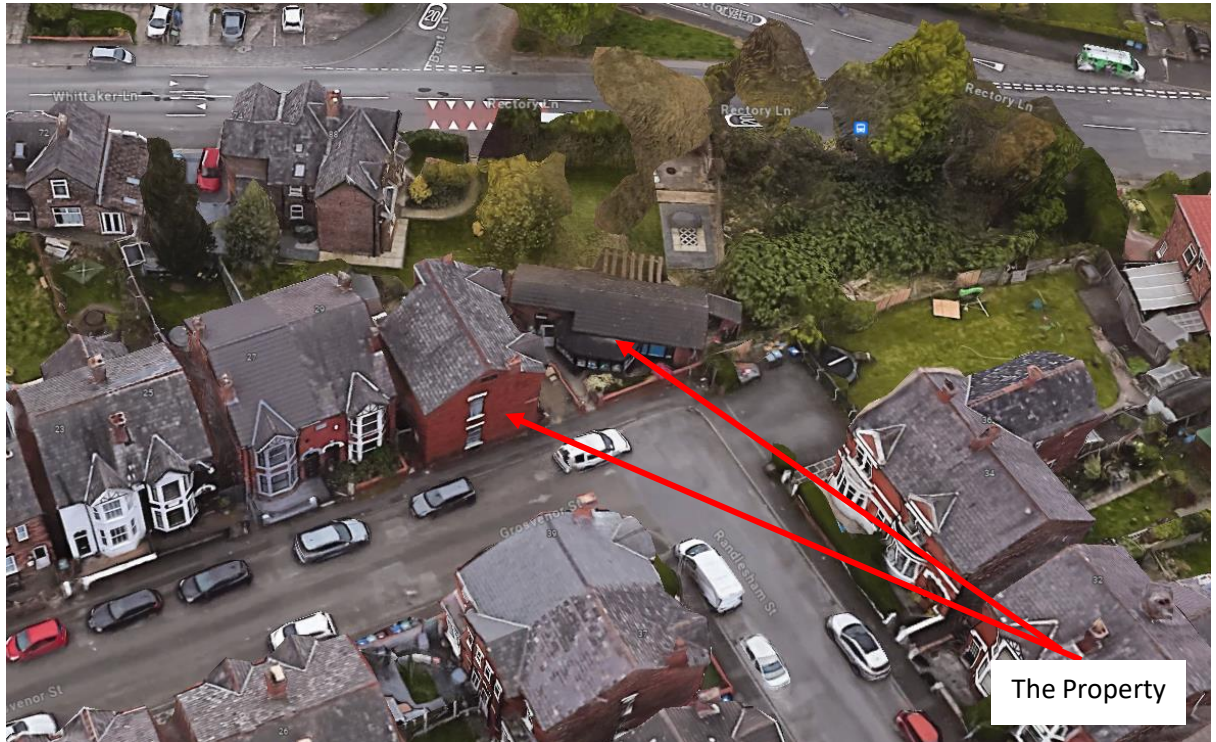


Fig.2 – Satellite Imagery - The property in its local setting (Source: Google Maps)

Access

16. The property has no in-curtilage parking provision, and its pedestrian access and principal elevation are accessible from Grosvenor Street. There is no access to the rear of the property except through the property itself.
17. However, the property is in a sustainable location, accessible to services, facilities, and employment opportunities by foot and bicycle and wider areas by public transport services.
18. Buses can be caught from Rectory Lane to the north and Heywood North to the east.

The Property

19. The property is a two-storey, detached house with a double-pitch slate roof. Its axis is perpendicular to the street, so its principal elevation is on the west side, facing the pool building.
20. The principal elevation has three bays, the central bay including the main entrance with a window above. To either side of the main entrance is a full-height bay window topped with a pitched roof extending above the eaves height.
21. As one can see from Figure 3 below, the property is in good repair.



Fig.3– Imagery - The principal south elevation of the property (Source: Google Maps)

22. A triangular area to the rear of the property can be used as a private external amenity area.
23. Internally, the property comprises a hallway leading to three reception rooms, a kitchen, a toilet and stairs to the upper floors.
24. The first-floor landing provides access to four large bedrooms, one small bedroom, a bathroom and stairs to the loft space used for storage.
25. The pool building is a single-storey building with pitched, tiled roofs. Internally, it comprises an entrance hall in the conservatory leading to two changing rooms and a swimming pool. There is a utility room accessible from the outside only.

Key Views

26. The principal public vantage points of the property are from Grosvenor Street and Randlesham Street.
27. However, the property's external appearance will alter only slightly with the changes to the fenestration of the pool building and two dormer windows being proposed on the east roof slope of the property.

Planning Policy

28. The starting point for considering planning applications is set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004. It confirms that applications for planning permission are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
29. This statement will evaluate the consistency of the proposed development with the relevant planning policies of the Development Plan, national policy contained within the National Planning Policy Framework [*'the Framework'*] and other material considerations.
30. Paragraph 224 of the Framework states that its policies are material considerations that should be considered in dealing with applications from the day of its publication.
31. Plans may need to be revised to reflect the replacement Framework's policy changes. Revisions should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.
32. In this case, the Places for Everyone Joint Plan [*'Pfe'*] was adopted on 24 March 2024, and the Council is in the early stages of developing a new Local Plan for Bury. For now, the Bury Unitary Development Plan adopted way back in 1997, guides development proposals.
33. The Pfe Development Plan Document was adopted by the Bury Council with effect from 21 March 2024 and supersedes some of the UDP policies, as set out in Pfe Appendix A Table A.

Unitary Development Plan Policy

34. The most important UDP policies for consideration of the proposal, including a change of use and operational development, are considered below.

H2/3 Extensions and Alterations

H2/3 - Extensions and Alterations Applications for house extensions and alterations will be considered with regard to the following factors: the size, shape, design and external appearance of the proposal; the character of the property in question and the surrounding area; the amenity of adjacent properties; visibility for pedestrians, cyclists and drivers of motor vehicles.

Justification

This policy is concerned with ensuring that extensions and alterations to residential properties are of a high standard. Extensions and alterations to dwellings, including garden extensions and garages, can be visually intrusive; restrict daylight, privacy and outlook to neighbouring properties; and unacceptably reduce the available garden area. For all these reasons it is necessary to adopt standards to control the design, form and size of proposed extensions and alterations to ensure that they are sympathetic in nature with the original building and surrounding area. The Council will issue more specific guidance on these matters as necessary.

35. This policy is supported by SPD 6, *Alterations and Extensions to Residential Properties*, also considered in detail.
36. The proposal includes only modest alterations to the external envelope of the buildings of the property, including changes to the fenestration of the conservatory of the pool building and the installation of two dormer windows on the east roof slope of the property.

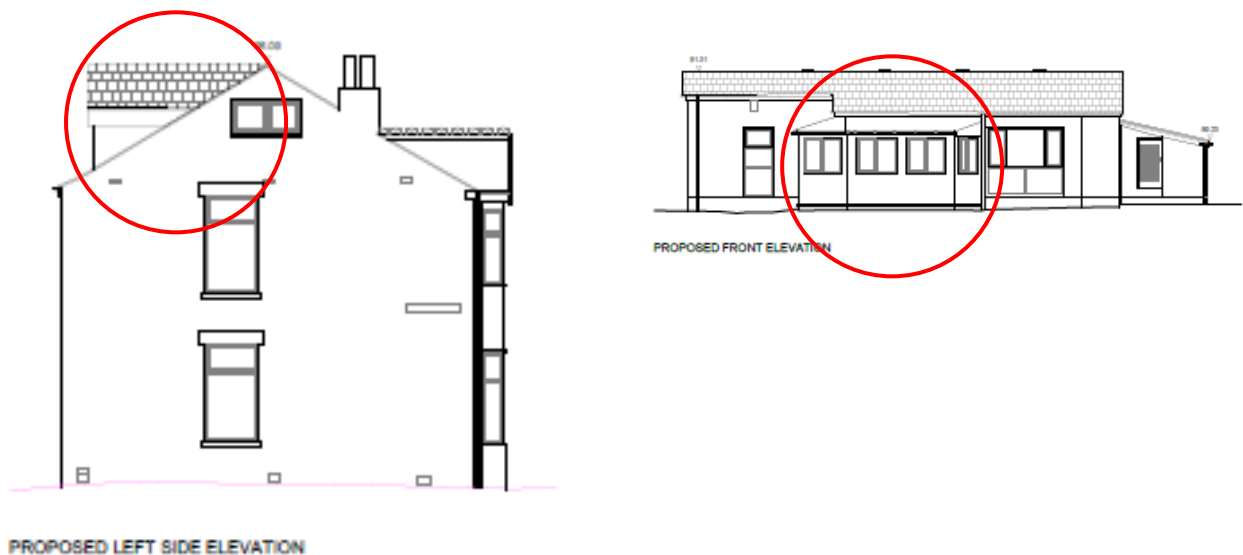


Fig.4– A focus on the operational development elements of the proposal (Source: Supporting Drawing 020B-EE)

37. The dormer windows have pitched roofs like bay windows on the opposite elevation. The dormers are offset from the eaves and no higher than the main ridge line of the property. A significant proportion of the existing roof slope will remain. Materials that are the same as or sympathetic to that of the property will be used. Finer details can be secured as a condition of planning permission.

38. The dormers will overlook the roofs of the adjacent terrace of properties. They would not introduce an outlook that would be detrimental to the privacy of its occupants.
39. The fenestration of the conservatory will be replaced with new windows and brickwork to facilitate its use as a habitable space.
40. The applicant has considered the guidance set out in SPD 6, *Alterations and Extensions to Residential Properties*, particularly that which guides dormer and roof extensions¹, in concluding that there is no conflict between it and the proposal.
41. Accordingly, the applicant contends that the operational development proposed would not conflict with Policy H2/3 of the UDP.

H2/4 - Conversions

*Applications for the conversion of buildings into two or more self contained units, **or the conversion of a building into a house of multiple occupation** (emphasis added), will be considered with regard to the following factors:*

the effect on the amenity of neighbouring property through noise, visual intrusion, the position of entrances, impact of parking areas, extensions and fire escapes;

the general character of the area and the existing concentration of flats;

the amenity of occupants;

the effect on the street scene of any changes to the external appearance of the building;

car parking and servicing requirements.

Justification

Given the trend towards smaller households, the conversion of buildings into self contained units and houses in multiple occupation can be an effective way of providing small, relatively low cost accommodation. However, it is necessary to ensure that dwelling standards are maintained and to ensure that, generally, an over provision of such property does not adversely affect the need to maintain a good mix of housing types, or adversely affects the character and amenity of residential areas. The car parking requirements in factor (e) should accord with the Council's car parking standards referred to under Highways and Transportation Policy HT2/ 4 - Car Parking and New Development and set out in Appendix 4 of the Plan.

42. Policy H2/4 is neither a restrictive nor permissive policy. This policy states the parameters against which the Council will assess the suitability of an HMO development proposal.

¹ Paragraph 6.1

43. It is supported by Development Control Policy Guidance Note 13 [*'the SPD'*] adopted by the Council in May 2007.
44. Assessment of the proposal against this SPD will indicate whether or not the proposal adheres to Policy H2/4 of the UDP. And so this statement will consider this document in detail.

Conversion of Buildings to HMOs SPD

Residential Amenities of Neighbours

45. Any increased occupancy of a building for HMO purposes should not have a detrimental effect on the amenities of the surrounding residents through noise, visual intrusion, the position of entrances, impact of parking areas, extensions and fire escapes. Nor should it harm the general character of an area and should respect the street scene.
46. It should respect the property's exterior and characteristics, provide an acceptable standard of accommodation for end users to enjoy and provide appropriate levels of car parking and service facilities.
47. So there are several issues to address here, and we shall first consider the residential amenities of neighbours.
48. The proposal must not unacceptably harm the residential amenities that neighbours enjoy. The most prevalent perceived harm associated with uncontrolled, historic HMOs occurs through anti-social noise and disturbance, and we shall come to this issue momentarily.

Scale and Concentration of HMOs

49. To preserve the residential amenities of neighbours, the Council would seek to ensure, *'wherever possible'*, HMOs are limited to 10 occupants. Such a restriction could be challenging to uphold at appeal. However, in this instance, the number of persons occupied does not exceed this arbitrary threshold.
50. The applicant advances the argument that through the measures and controls advocated in this statement, the proposed HMO would not compound any adverse consequences of any historic, uncontrolled HMO in the vicinity.

Anti-social behaviour

51. One should not automatically assume HMO tenants are the leading cause of anti-social behaviour. Any occupier of any property could cause concerns in a community. Nonetheless, it would be disingenuous for the applicant to suggest there is a guarantee that future residents would not engage in anti-social behaviour. However, the controls and measures the applicant advocates will reduce the potential for noise ASBs and deal with problems that arise efficiently and effectively.

Police ASB Crime Reports

52. The author would ordinarily refer to the Police Crime Reports (Police.UK, n.d.) for the area and summarise the ASB crimes over the last reporting year. Rarely do they demonstrate a high incidence of ASB crime, even in areas where the concentration of HMOs is high. However, for whatever reason, no data is available from the Greater Manchester Police for this area. If it does become available, the author will update this statement.
53. Police Crime Reports would usually demonstrate that crime and the fear of crime associated with the proposed use is a perception, not a reality.
54. The property would benefit from natural surveillance from surrounding properties, most of which are in single-family use. There is no reason to believe the accommodation would not meet reasonable security expectations. A professionally fitted security system will act as a deterrent to burglary if the property is empty.

Property Management Plan

55. However, the applicant will take measures to minimise the potential for their tenants to cause anti-social behaviour. If there are such occurrences, neighbouring properties can report them to them. They can set out procedures in a property management plan secured through a condition of planning permission.
56. A property management plan will enhance the quality of development. Government guidance (Ministry of Housing, Communities and Local Government, 2019) is that conditions should be tailored to tackle specific problems rather than standardised or used to impose broad, unnecessary controls. Here is one of the instances where a condition can be tailored to mitigate any adverse effects of the development.
57. The applicant considers that securing a property management plan would meet the necessary test to safeguard the residential amenities of neighbouring properties.
58. Such a property management plan would be relevant to controlling the property's proposed use and, therefore, relevant to planning. It would not be ultra vires.
59. The Council could enforce the condition if the appellant or successors in the title do not adhere to the property management plan. The condition would prevent harm to the area's amenities that may result from the development.
60. It would not be difficult to monitor, as those affected by a contravention of the condition's requirements are highly likely to be able to provide clear evidence of any breaches. Accordingly, the condition would be practically enforceable.

61. The condition could require the applicant to implement a property management plan before commencing the use per a plan approved in writing by the local planning authority. If the applicant is not adhering to the plan, the Council has the discretion to enforce compliance with the condition.
62. The applicant considers such a condition perfectly reasonable and should assure neighbours that the property is well-managed.
63. They will gladly work with the Council to secure an appropriate property management plan.

Noise and disturbance

64. Councils often assert that persons sharing an HMO would live independently, but this is not always the case. Alternatively, prospective occupiers can come together as a group, not as individuals. They may have a commonality, such as working together, a course of study, a club or a sports team. While having the sole occupation of a bedroom, HMO occupiers generally share communal areas as a household, just like occupants of a single-family home. They do not necessarily have entirely separate lives.
65. In this case, the property will occupy ten people, four more than the fallback position of a Class C4 HMO with six occupants.
66. Given the street's character, the HMO proposed would unlikely result in a sense of abandonment outside of term times. Families occupy other properties on the street and in the vicinity. The introduction of an HMO in this location would unlikely have a discernible effect on the social functioning of the area.
67. The Planning Inspectorate does not usually support an assertion that HMOs can often be noisier than a family home.
68. There is rarely evidence to substantiate that HMO occupiers would be noisier or keep more anti-social hours than other potential residents. The potential for nuisance applies to all residents and it could be expected that a responsible landlord would ensure that their tenants occupied premises in a manner which respects neighbouring occupiers. All residents, in whatever form of tenure, have the potential to cause nuisance according to the individual.
69. It is not considered that the proposal would significantly impact the residential amenities of neighbouring properties in terms of increased noise and disturbance.
70. The Building Regulations address the required standard of noise separation and details of the measures taken to achieve adequate sound separation between the property and those adjacent properties likely to be affected by the proposed scheme.
71. However, Part E of the Building Regulations does not relate to changing use from a single-family residence to a small HMO or a small HMO to a large HMO.

72. Paragraph 194 of the Framework advises that planning policies and decisions should focus on whether the proposed development is acceptable land use. Policies should not focus on controlling processes or emissions where these are subject to separate pollution control regimes. Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.
73. The Building Regulations are not intended to eliminate noise altogether but ensure a minimum airborne sound resistance for dividing walls and floors between homes.
74. The Regulations would secure a minimum level of airborne sound resistance of 43dB for conversion to a home. This would easily cut out normal levels of speech, TV and amplified music playing. For impact sounds like footsteps, jumping and dropped objects, a maximum impact sound transmittance level of 64dB is set for floors and stairs in conversion projects.
75. For attached homes, developers can conduct an on-site sound test on dividing walls between homes **or** follow a robust set of Standard Details.
76. The applicant would welcome a condition of planning permission to secure attenuation **if necessary** to ensure the property will provide the minimum airborne and impact sound resistance level. The property could be tested, and any attenuation scheme secured based on the findings. Alternatively, and preferably, standards can be followed.

Crime and the Fear of Crime

77. As detailed above, the author would ordinarily refer to the Police Crime Reports (Police.UK, n.d.) for the area and summarise the ASB crimes over the last reporting year. Rarely do they demonstrate a high incidence of ASB crime, even in areas where the concentration of HMOs is high. However, for whatever reason, no data is available from the Police for this area. If it does become available, the author will update this statement.
78. Police Crime Reports would usually demonstrate that crime and the fear of crime associated with the proposed use is a perception, not a reality.
79. The property would benefit from natural surveillance from surrounding properties, most of which are in single-family use. There is no reason to believe the accommodation would not meet reasonable security expectations. A professionally fitted security system will act as a deterrent to burglary if the property is empty.

80. The applicant considers compliance with any Building Regulations or equivalent noise attenuation specifications, and a property management plan could address any marginal differences between the noise generated by end-users and those of the existing property (including the fallback position of six occupants).

Visual Intrusion

81. We shall come back to the car parking issue momentarily. Still, the proposal does not introduce changes in the property's appearance that would be detrimental to the visual amenities of the street or area.
82. Bins and bicycles will be stored at the rear of the property and shall not be visible from public vantage points. Moreover, the proposal does not introduce any car parking within the property.
83. Bins will be brought onto the highway on the day of collection and returned to the store, preserving the visual amenities of the area.
84. The proposals do not include the erection of external fire escapes. Two new dormer windows and changes to the fenestration of the pool building are proposed. An assessment of these elements against relevant policy and guidance will demonstrate they are acceptable and would not harm the character of the area, street or property.

Privacy

85. The Council will resist proposals leading to an unacceptable loss of neighbouring properties' privacy.
86. Only two new windows are proposed, the two dormer windows in the east-facing roof slope. These will overlook the roof of the terrace and no other residence nearby where below acceptable separation distances would exist between habitable room windows.
87. The proposal will not adversely impact the privacy of neighbours.

Conclusion

88. Taking all of these issues into the round, the applicant contends that the proposal will not adversely harm the residential amenities of neighbours.

Residential Amenity of End Users

89. Several topics in the SPD would also help assess the property's suitability as an HMO from an end user's perspective.

Suitable premises

90. The SPD states HMOs will be restricted to detached or large semi-detached properties (with detached being preferred), as these tend to have larger internal and external floor areas.

91. The applicant contends it would be challenging for the Council to uphold a refusal on appeal only because a property was not detached or semi-detached.
92. However, the SPD states that large terraced houses may also be considered, but this will depend on their size and the development's traffic and noise impact.
93. In this case, the property is detached.
94. The SPD also seeks to require HMOs to have an original floor area of greater than **115m²**, again, something it would probably find difficult to uphold at appeal. That said, the property far exceeds the minimum floor area requirement.

Access

95. The primary access to both buildings is via entrances on the principal elevations, which are visible from public vantage points of the street. Moreover, the entrances are inward facing, meaning the comings and goings of the occupants are less likely to cause noise and disturbance to neighbours.

Amenity Space

96. The SPD requires the property to have a yard or garden to provide external private amenity space for end users to enjoy '*where the opportunity exists*'.
97. Fortunately the property does have private external amenity space to the rear for end users to enjoy. Moreover, numerous public parks are accessible for recreation and relaxation in the fresh air.
98. The Council's HMO licensing standards govern whether or not the property would provide adequate internal amenity space. We can also now turn to the Nationally Described Space Standards for guidance (Ministry of Housing, 2015).
99. The space standards are set out in Schedule 2, Paragraph 2.7 of the Licensing Conditions (Bury Council - Urban Renewal Service, Feb 2019).
100. The standards require bedrooms to have the following minimum floor space:
Single, minimum floor area of 6.5 metres² (70ft²)
Double, minimum floor area of 10.2 metres² (110ft²)
101. All the bedrooms significantly exceed the minimum floor area for single-occupancy rooms and have adequate ventilation and natural lighting.
102. More detailed considerations of the Licensing Conditions are not a matter of the planning application.

Cycle Parking

103. According to the SPD, there is no stipulated level of cycle parking to be provided. Still, provision should be based on the needs of occupants, staff and visitors.
104. All development proposals must provide appropriate parking levels in line with the standards set out in Section 5, Table 2 of the Council's Parking Standards (Bury Council, May 2007).
105. However, there is no guidance on the parking standards for HMO development.
106. The supporting plans indicate cycle storage at one bike parking space per occupant, which the applicant contends is an appropriate level of cycle parking.

Conclusion

107. Accordingly, the applicant contends that their proposal would provide an acceptable level of internal and external amenities for end users.

Car Parking

108. The Council will seek to resist HMO development proposals that would harm highway safety or harm amenities (presumably residential and visual amenities).
109. No specific guidance is given in the Parking Standards for parking associated with HMOs. Paragraphs 3.22 and 3.23 of the HMO SPD state:

3.23 However, the Council recognises that it is difficult to set actual car parking standards for HMO as this will often depend on the end user and the location of the property. Accordingly, the level of parking provision will be considered depending on the specific circumstances involved and location of the proposal.

3.24 Nevertheless, as a general principle, off-street car parking facilities should be provided for future occupants where this is possible. The type of resident to be accommodated, together with visitor demand and any requirements for staff parking should be considered when determining parking provision.

3.25 Where no off-street parking can be provided then the effect of the development upon parking in the vicinity of the site will be carefully considered to ensure that there will be no significant adverse impact upon residential amenity or highway safety.

110. However, the applicant contends, and the Council accepts, that residents of HMOs generally have low car ownership levels.

111. A meta-analysis of existing research and literature for the Department for Transport by Oxford and Bristol Universities (Chatterjee, et al., 2018) has looked into transport trends for those aged 17-29. It found a sharp decline in car usage and ownership in this age group. Furthermore, the study found the proportion of those in this age group holding a driving licence had fallen in recent years.
- 'Driving licensing among young people peaked in 1992/4, with 48% of 17-20 year olds and 75% of 21-29 year olds holding a driving licence. By 2014, driving licence holding had fallen to 29% of 17-20 year olds and 63% of 21-29 year olds. Between 1995-99 and 2010-14, there was a 36% fall in the number of car driver trips per person made by people aged 17-29, with a fall of 44% for men and 26% for women.'*
112. The study demonstrates it is reasonable to presume that younger people, more likely to occupy HMO property, have less demand for parking spaces than they did and are likely to in the foreseeable future.
113. Accordingly, communities with higher proportions of HMOs will likely find less demand for offsite parking spaces than previously.
114. The property has no in-curtilage parking spaces, but there is unrestricted roadside parking in the streets near the property.
115. Furthermore, the proximity of public transport and local services also reduces reliance on private motor vehicles. It adds to the sustainability credentials of the scheme.
116. In this regard the National Planning Policy Framework [*'the Framework'*] advises that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
117. Cycle parking, secured as a condition of planning permission, can be provided to the rear of the property as shown in supporting plans.
118. The applicant contends that not providing in-curtilage parking space is acceptable and that if there are any cars associated with occupants, they are likely small in number and can be accommodated on the street without detriment to highway safety or the visual and residential amenities of the area.
119. The surrounding streets have no parking restrictions and are typically wide enough to allow parking on both sides without obstruction.

Conclusion

120. Having considered the proposal against the Council's SPD, the applicant contends that their proposal will not conflict with UDP Policy H2/4, *Conversions*.

Policy EN7/2, Noise Pollution

121. Policy EN7/2 is a restrictive policy that will not permit development which could lead to an unacceptable noise nuisance to nearby occupiers and/or amenity users. For the reasons given above, including the controls and measures advocated by the applicant, they contend that the proposal would not lead to unacceptable noise that would adversely impact the residential amenity of neighbours.

Policy HT2/4, Car Parking and New Development

122. The Council requires development to make adequate provision for car parking and serving requirements in accordance with the Council's Car Parking Standards.
123. This matter is considered in detail above, and the applicant contends that their proposal does not conflict with Policy HT2/4, given the inherent flexibility of the standards.
124. The property has no in-curtilage parking provision and the proposal will not change this position. Any vehicles associated with the use can be parked on the street without detriment to highway safety or residential and visual amenities.

Conclusion

125. Considering all its relevant and important policies, the applicant contends there is no conflict between the UDP and their proposal.

National Policy

126. Planning law requires applications for planning permission to be determined according to the development plan unless material considerations indicate otherwise. The National Planning Policy Framework [['Framework'](#)] is a material consideration.
127. At the Framework's heart is a presumption in favour of sustainable development. Local planning authorities should approve proposals that accord with an up-to-date development plan without delay.
128. They should also grant permission, where there are no relevant development plan policies or the most important policies for determining the application are out-of-date unless policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or 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.

129. This statement demonstrates that the proposal adheres to the saved policies of the UDP.
130. The Framework itself gives no specific guidance on HMO proposals, except there is a general accord with the Council's Policy and paragraph 63 of the Framework with respect to the intent to create and maintain sustainable, inclusive and mixed communities:
- 63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes. The purpose of the planning system is to contribute to sustainable development. It has an important social role in meeting present and future generations' needs across various tenure forms. There is no conflict between the proposal and Part 8, Promoting healthy and safe communities.*
131. The Framework seeks to secure a high standard of amenity for existing and future occupants. Paragraph 191 (a) states that planning decisions should mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new developments and avoid noise giving rise to significant adverse impacts on health and quality of life. The Framework refers to the Noise Policy Statement for England to assist in interpreting noise impacts.
132. The Statement identifies three types of noise. It would be '*neighbour noise*' that, without appropriate controls, may be an issue in this case – i.e., noise from inside and outside people's homes. The applicant acknowledges that noise exposure can cause annoyance and sleep disturbance, impacting the quality of life. However, subject to appropriate measures and controls advocated in this statement, the proposal would not amount to a '*significant adverse impact on health and quality of life*', the test in the Framework.
133. Accordingly, the applicant suggests the Council has grounds to grant planning permission for this acceptable proposal by virtue of paragraph 11(c) of the Framework.

Conclusion

134. The proposal will fully comply with the relevant development plan policies and guidance in the Council's SPDs. Nor does the proposal conflict with the Framework, taken as a whole. Consequently, the applicant considers this a form of sustainable development that can be approved without delay by virtue of paragraph 11(c) of the Framework.

Design

135. The applicant intends to ensure that their proposal sits comfortably and appropriately in its setting. This statement section illustrates how the proposal complies with the Development Plan and National Planning Policy Framework regarding its design.

Use

136. It is proposed to change the use of the property from a Class C3 dwellinghouse to a large HMO (sui generis).

Amount

137. There will be a net increase in four occupants from the fallback position of six occupants in a Class C4 small HMO.
138. The existing property has no in-curtilage parking provision, and the proposal cannot change that position.

Layout

139. Considering the main building, the property will comprise a hallway leading to two en-suite bedrooms, the combined kitchen/diner and stairs to the upper floors.
140. The first-floor landing will provide access to three more en-suite bedrooms, two shower rooms and stairs to the second floor within the loft space.
141. The loft space will provide two more bedrooms.
142. The former pool building will comprise ancillary accommodation in the form of a kitchenette leading to the hallway that provides access to three bedrooms, one en-suite, and two shower rooms.

Scale and Form

143. The form of the building envelope will be changed slightly by introducing two dormer windows on the east roof slope of the property.
144. The residential scale of the property shall be increased by four occupants from the fallback position of six occupants.

Landscaping

145. No additional hard or soft landscaping is proposed.

Appearance

Property Maintenance

146. As will be evidenced in the officer's site visit, the property is in a good state of repair. The applicant has letting policies to ensure occupiers of its managed properties must keep the property clean and tidy, inside and outside. There are guidelines for reporting repairs and maintenance issues, rubbish collection and storage. Annual maintenance and repairs of its buildings and their gardens are carried out in any case.

Access

147. The property is accessible by a public network of footpaths and roads. Hence, the site is not isolated from people, buildings, or places.
148. It has excellent access to the public transport network, a short walk away.
149. It is within walking distance of services, facilities and employment opportunities.

Inclusive Access

150. Should a need arise, the building will be further adaptable. It is accessible to people with impaired mobility and other disabilities like impaired sight or hearing.

Consultation

151. The applicant will rely upon responses to the Council's publicity and consultation per The Town and Country, Planning (Development Management Procedure) (England) Order 2015 to identify any areas of concern, including access.

Specific Issues

152. The property is within Flood Zone 1, as shown on the Environment Agency's Flood Map for Planning and has a low probability of flooding from rivers and the sea. *End of statement*

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