

Bury Council
The Planning Service
3 Knowsley Place
Duke Street
Bury
BL9 0EJ

Via Email: D.Clapworthy@bury.gov.uk

Dear Dean,

RE: Application No. 70136 - Change of use of ground floor to 7 bedroom HMO (Sui Generis); Single storey rear extension; Alterations to include new windows and doors

21 Church Street East, Radcliffe, Manchester, M26 2PG

The Applicant understands that the Council received a number of consultation responses to the above planning application, which we are seeking to address in turn in this letter.

Statutory Consultation Responses

A bat survey was undertaken on site in November 2023 by Roavr-Group which found part of the ridge of the roof of the existing 2-storey building to have a low potential for roosting bats.

GMEU's consultation response recommended the application to be deferred or refused until such time that further bat surveys can be undertaken upon the ridge roof area during the optimal survey period to confirm the presence or absence of bats.

It is however noted that the existing roof of the 2 storey building is not part of the planning application and there are no works proposed to this area of the building as explained in the application documents. External works only relate to the demolition of the single storey extension to the rear and alterations to include new windows and doors.

An amended Ecology Report is submitted to the Council to clarify this in the report highlighting that the proposed development carries NO potential for roosting bats, which should address GMEU's objection to the application.

Public Consultation Responses

The key matters raised by the general public are summarised below and each addressed in turn:

1. Principle of Use - Proposed HMO and Loss of Ground Floor Commercial

The site is located in an established residential area and the existing property was originally a residential dwellinghouse before its ground floor was converted to commercial / business use. It is located in close proximity to Radcliffe Town Centre (10 minutes walking) and in a highly sustainable location within 7 minutes walking distance to Radcliffe Metrolink stop.

HMOs can make an important contribution to the availability of a diverse housing stock that serves the needs of a large segment of society including graduates, young professionals, key workers, young entrepreneurs, single-households saving for a deposit or unable to get on the housing ladder.

It is recognized as with any industry there are different standards and brands within any given market. As an example not all cars would be considered equal although traditionally they all have 4

wheels. In property use classes all HMO's are either C4 up to six occupants or Sui generis for seven occupants and over. What isn't addressed is the target customer and tenant type.

The HMO market offers a well known brand standard known as "Co-Living". This standard is aimed at differentiating away from traditional HMO stock sometimes used for transient natures such as student, rehab, asylum or emergency accommodation towards a more modern high quality shared living experience where the accommodation affords things liked personal ensembles, double sized room standards for single occupants, home working facilities built in, high spec kitchens, longer expected tenancies. Both types of stock cater and hold merit for their target markets and make up for a mixed housing type.

The applicant aims for their properties to feature in the Co-Living standard of attractiveness and be in the top performing Co-Living HMO's in any geographical market. (See **Appendix 1** for some internal images of other HMO's managed by the applicant). This is demonstrated further with the high volume of professionals traditionally applying to live in their accommodation sometimes upwards of 100 professional applicants for a single room.

It's worth noting the Radcliffe SRF notes *"Radcliffe has a youthful population and a high proportion of residents of working age. In addition, there is an entrepreneurial spirit that should be fostered. Housing within the centre should therefore seek to support the working population and young families. Housing does not have to be a traditional C3 use-class."..."A mix of housing types is required to meet the needs of existing Radcliffe residents as well as attracting new residents into Radcliffe."*

Whilst Bury Council does not have a specific planning policy to restrict HMOs in parts of the borough or to limit the number of HMOs within a set radius to avoid their over-concentration, having reviewed the 'Bury register of licensed HMOs' (<https://www.bury.gov.uk/asset-library/bury-register-of-licensed-hmos.pdf>), there are only 3 HMOs identified within the vicinity of the site - please refer to the below map.

On this basis, it is not considered that the proposed development would contribute to an over-concentration of HMOs within the area, in particular to an extent that would have an adverse effect on residential amenity and the character of the area.

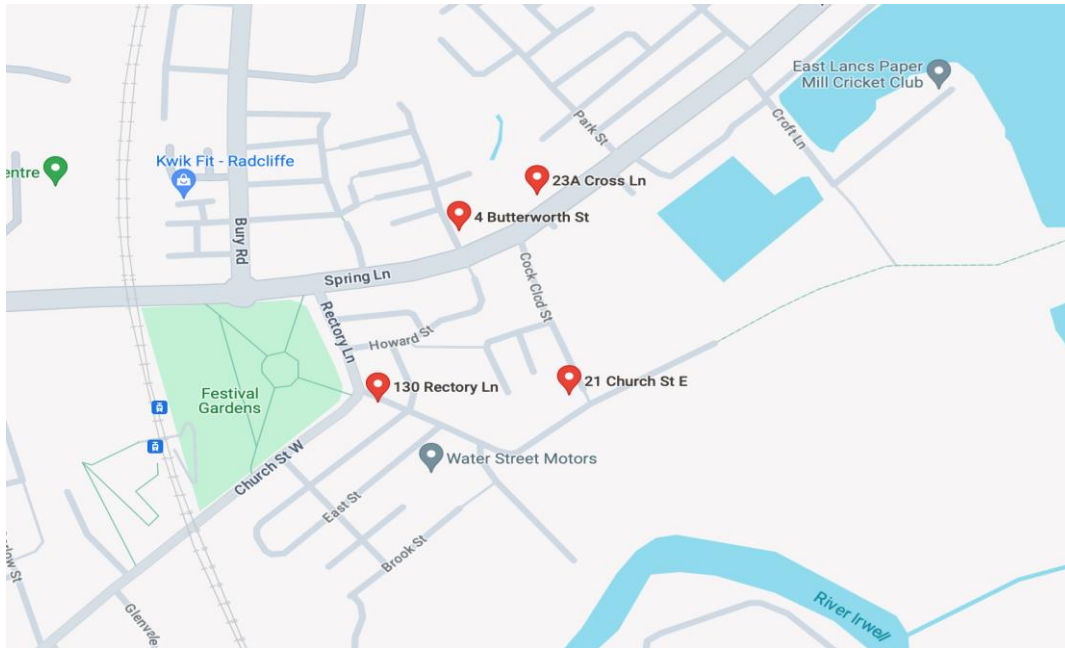


Figure 1. Registered HMOs within the surrounding area of the Application Site (Google Maps)

With regards to the loss of the commercial unit on ground floor, the property has stood vacant for over 18 months despite an extensive 6-months marketing period by the previous owner. Previous uses of the site included a pub, gym and pharmacy which have all failed and proved to be unviable due to the location of the site at the back of a residential area, lack of active frontage and little exposure to footfall.

Whilst the site is located on the edge but within the Radcliffe East Employment Generating Area (EGA) as designated under Bury's UDP, it is worth noting the change in circumstances in the East Radcliffe Area since the the UDP was adopted in 1997 and the original EGA designation was made. In particular, the majority of the EGA was historically occupied by the East Lancashire Paper Mill site which was closed and demolished in 2001. The majority of this area is now earmarked for strategic housing development for which outline planning permission was granted in 2018.

Overall, the proposed HMO use is consistent with the existing and future residential nature of the area and it will contribute to the availability of a diverse range of housing product that caters for a specific housing need within Radcliffe.

With regards to the fall back position, it is noted that the internal ground floor area of the existing property is c.139 sqm, which is large enough to be converted to a 6-bed (8-persons) dwellinghouse and still exceed the minimum space standards by the NDSS (125sqm). The upper floor provides another c. 100 sqm which could easily accommodate another 3 or 4-bedroom (6 persons) dwellinghouse. Once the property has been returned to residential use across both floors (via a change of use to residential on the ground floor), it would not require planning permission to then convert to a HMO. On this basis, and in theory, the property could accommodate across the two floors 9-10 occupants if single occupancy, or more if some of the rooms were double occupancy.

The Applicant proposes a 7-bed HMO on the ground floor which will be subject to HMO Licensing Regulation, each with spacious high-quality rooms with private en-suite bathroom and a large communal area. The upper floor is proposed to stay as a 2-bedroom flat.

2. Alignment with Radcliffe Strategic Regeneration Framework and Outline Planning Permission

The site is located at key gateway entrance road into the old East Lancs Paper Mill strategic housing development area for which outline planning permission for up to 400 new homes was



approved in 2018 (amended via s.73 permission ref. 67597 in March 2022).

Figure 2: Extract of Illustrative Masterplan for old East Lancs Paper Mill planning permission

The application site also fronts onto Rectory Lane and Church Street East - which form part of a key pedestrian route between the town centre and the new housing site, as well as a new green pedestrian link to the River Irwell and associated public open space and children's play area.

The proposed re-establishment of the residential use at the site is considered consistent with the long-term strategic regeneration of the area and, in particular, with the recent outline planning permission, and its proposed refurbishment will enhance the physical environment along a key pedestrian route and gateway entrance into the new housing development.

3. Quality of residential accommodation

The proposed external works to replace the existing windows and doors of the existing dilapidated building, and to demolish the existing unsightly single-storey side extensions to the rear and construct a new single storey rear extension, will improve the external appearance of the building and rationalise the internal layout to allow the existing building to be brought back into a viable use.

The proposed HMO is aimed at the Co-Living end of the scale previously discussed and includes generous en-suite bedrooms with double beds and a large shared communal area for kitchen / dining / living room. The proposed accommodation meets and exceeds the required HMO licensing standards and will also provide an external open space for the enjoyment of future residents.

The Applicant has a strict tenant referencing procedure for its HMO properties to ensure selection of high calibre tenants in order to limit exposure to damage to the property which are refurbished to a high quality standards with private en-suite bedrooms, brand new kitchens and outdoor open space.

The Applicant manages a small portfolio of Co-Living HMOs within Salford, Bolton and Bury and images of other HMO properties are enclosed in **Appendix 1** which show the proposed quality of accommodation. All its HMOs are fully let by a mix of nurses, junior doctors, care workers and working professionals contributing to the local community.

4. Impact on neighbouring residential amenity

Engagement with surrounding neighbours

Prior to the submission of the planning application, the Applicant undertook a targeted engagement with the surrounding properties located on Nos. 6-16 Cock Clod Street and Nos. 1-13 Baybutt Street that could be impacted by the proposed works to explain to nearby residents the proposals and provide re-assurance about the quality of the rental accommodation, management of the property and calibre of future tenants based on other existing HMOs managed by the Applicant in Bury, Bolton and Salford.

Response from surrounding residents was overwhelming supportive and they were looking forward to having the building brought back to active use and management to discourage vandalism and ASB.

Given the Applicant's positive engagement with surrounding neighbours, we are surprised by the number of negative comments received on the planning application and can only suspect that these comments are received from residents further afield or the general public who are less familiar with, and equally less impacted by, the proposals.

Existing crime and antisocial behaviour

The existing building has a run-down appearance and in need of refurbishment both internally and externally. It includes three small single storey extensions to the rear and an external staircase to provide access to the upper floor, which create suboptimal access arrangements and inefficient layout. The property has been vacant for over 18 months and has attracted antisocial behaviour with several break-ins, graffiti and vandalism, with the most recent ones in July and September 2023 resulting in 9 arrests across 2 occasions. Since the Applicant acquired the site, it bolstered security across the site.

The proposed residential use of this site would bring the existing building back to a viable use which would be actively managed, its new use would provide passive surveillance, and improve the overall appearance of the building to discourage vandalism and antisocial behaviour.

Transport and Car parking

There is no specific car parking standards for HMO's in SPD11 Parking Standards in Bury, but SPD 13 'The Conversion of Buildings to Houses in Multiple Occupation' gives some general advice and states that parking and road safety issues will be important considerations when assessing a planning application and any proposal that is considered to have a detrimental impact on highway safety or harm to amenity will not be permitted.

The application site is located in a highly sustainable location c. 450 metres (or a 7 minutes) walking distance from the Metrolink stop with connection to Bury and Manchester and within a 10 minutes walking distance from Radcliffe town centre with access to shops, amenities and other modes of public transport. The proposed intensification of the use at the application site is consistent with its highly accessible location on the edge of the town centre.

There is on-street parking available on Cock Clod Street which is utilised by the existing residential properties on this street. Other nearby residential streets in the locality operate a residential parking permit which would deter future occupiers of the HMO from parking on nearby street and causing parking problems for the existing residents in the area.

It is noted that the outline planning permission proposes to widen Cock Cod Road into a new entrance road to the new housing estate at the old Lancs Paper Mill Site. However, the proposed highways improvements are cognisant of the existing on-street parking arrangements for the existing residential properties (including the application site) on Cock Cod Lane. On this basis, the proposed change of use would not undermine the proposed housing development on the other side of Cock Cod Street.

It is also noted that the site was historically used as a pub then part residential (upper floor) and part commercial on the ground floor as a gym and pharmacy. These uses have a larger trip generation and can attract people from a larger catchment area who would be more reliant on private vehicle use to get to the site.

It should also be acknowledged that an HMO use tends to have a lower level of car usage than a single residential dwelling or a commercial / business use and it is generally expected that town centre living would not necessarily or automatically provide parking, and any future occupiers would be made aware of this fact before taking up residence. On this basis, it is reasonable to expect that the number of trips to the site would be less compared to a commercial use on the ground floor.

As such, the proposal is considered to be acceptable and would not adversely affect highway safety in line with national and local planning policy.

Conclusion

The proposed works are considered acceptable and consistent with the existing and future regeneration of the surrounding area, and in line with local and national planning policy. Therefore, planning permission should be granted by the Council, subject to any necessary conditions.

Should you require any further information, please do not hesitate to contact me.

Yours Sincerely,

Phil Bygrave

(The Agent)

Appendix 1 - Images of other HMOs managed by the Applicant

