

**23/00617/FUL Erection of a first-floor rear extension. 112 Upper Shaftesbury Avenue  
Southampton SO17 3RT**

Highfield Residents Association objects to the Planning Application and proposals to further extend the semi-detached HMO dwelling at 112 Upper Shaftesbury Avenue.

Minimal information has been supplied with the application which is described as, 'erection of a first-floor rear extension' and in the Application Form as, 'a part first storey rear extension over an existing extension'. (Ref: 23\_00617\_FUL-APPLICATION\_FORM\_-\_WITHOUT\_PERSONAL\_DATA-1801087.pdf). However the drawings (Ref: 23\_00617\_FUL--1805724.pdf) show an existing layout of 4 bedrooms and a proposed layout of 6 bedrooms due to an additional proposed loft conversion.

The dwelling has a 4-bed HMO Licence valid until 30/09/2023 (Ref: SCC Public Register of Licensed HMO properties in Southampton 05/06/2023).

Information from the Planning Case Officer, Craig Morrison, confirmed that the existing ground floor rear extension had no planning approval but, due to its dimensions, was likely to have been constructed under permitted development rights. It is not clear when this extension was constructed.

Drawings (Ref as above p.4.) show that the 'loft conversion and gable raise' is to be further carried out under permitted development rights.

There is an error in the Application Form: to the question –

Q. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Note that 'non-residential' in this context covers all uses except Use Class C3

Dwellinghouses.

No (was the given response)

The dwelling is currently not residential Class C3 but is, de facto, being used as Class C4 (HMO). The response should have been 'yes' because of the substantial gain of floorspace.

From the Southampton Register of HMO Licensed properties in Upper Shaftesbury Avenue (05/06/2023), there are 20 listed properties with a total of 114 HMO-beds. Any additional HMO provision would be a breach of the SCC Supplementary Planning Document, Local Plan Review Policy, H4 (2016), 'Planning and Houses in Multiple Occupation', updated in 2016.

The plan drawings (p.4.), particularly the rear and side, show a building that is grossly out of scale and top heavy for a semi-detached dwelling. Although there are no houses to the rear of the property as it backs onto Portswood Recreation Ground, there would be significant overlooking from the proposed loft extension particularly over the immediate adjacent properties (114 and 110).

Therefore HRA objects to the Planning Application for the following reasons:

- Overdevelopment of a semi-detached dwelling
- The plan drawings (p.4.) of the proposed elevations side and rear, illustrate a property that is out of scale and proportion to its adjacent semi-detached neighbours
- Possible breach of permitted development area (sq. m) as there has been a previous ground floor extension built under permitted development rights
- There are no arrangements for additional waste storage or collection for a larger HMO (4-bedrooms increased to 6-bedrooms)
- There are no arrangements for secure cycle storage
- There is no current parking at the house and none is proposed. An increase to 6-bedrooms will cause additional strain on already scarce parking spaces in Upper Shaftesbury Avenue
- There are no fire safety plans for a proposed building of three storeys
- Sam Kushner (SCC HMO Licensing Officer) confirmed that the dwelling was established as an HMO prior to Article IV coming into force in March 2012 and that no planning approval was needed for its current change of use as an HMO, Class C4. However there is an intention to increase capacity because 6-bedrooms are planned, yet no reference is made to any Planning Application for Class C4 use for a 6-bed HMO at this point going forward.

Highfield Residents' Association objects to the Planning Application for the reasons above and, in addition, asks the Planning Authority to:

- Establish whether such an extension and increase in occupancy of HMO numbers would contravene its own Local Plan Review Policy, H4 (2016), where the threshold of 10% is already far exceeded in both Upper Shaftesbury Avenue and the immediate locality.

‘The SPD defines a tipping point where the concentration of HMOs begins to adversely impact on the character and balance of a local community. This threshold is set at 10% of HMOs in the housing stock. Applications will not be granted for new HMOs where the proportion of HMOs within a 40 metre radius was above 10%’

(Ref: <https://www.southampton.gov.uk/planning/planning-policy/supplementary-planning/planning-hmo/>)

- Establish whether that the site lies within the ‘Zones of Influence’ of the Solent and New Forest European Sites (the EPS), where new residential development has the potential to harm the integrity of the EPS as a result of increased levels of nutrients from wastewater entering into the Solent water environment and increased recreational usage associated with new residential developments, with such impacts requiring the inclusion of a package of avoidance/mitigation measures to address these effects as no mitigation has been included in the application
- Establish whether the permitted development rights for a semi-detached dwelling of modest size would be exceeded with these plans for a loft conversion, considering a previous ground floor rear extension has already been built

HRA asks that the application be refused.

Barbara Claridge

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