

152-154 LONDON ROAD HILSEA PORTSMOUTH PO2 9DJ

**CHANGE OF USE FROM CLASS E OFFICES TO 13 BEDROOM HOUSE IN MULTIPLE OCCUPATION (SUI GENERIS), WITH ASSOCIATED WORKS TO INCLUDE ALTERATIONS TO THE FRONTAGE, FENESTRATION CHANGES AND THE CONSTRUCTION OF FRONT AND REAR DORMERS (RESUBMISSION OF 22/00338/FUL)**

**LINK TO ONLINE DOCUMENTS:**

[22/01667/FUL | Change of Use from Class E offices to 13 bedroom House in Multiple Occupation \(Sui Generis\), with associated works to include alterations to the frontage, fenestration changes and the construction of front and rear dormers \(resubmission of 22/00338/FUL\) | 152-154 London Road Hilsea Portsmouth PO2 9DJ](#)

**Application Submitted By:**

Mrs Carianne Wells  
Applecore PDM Ltd

**On behalf of:**

Mr Smith  
Scott Baker Properties

**RDD:** 2nd December 2022

**LDD:** 30th January 2023

## **1.0 SUMMARY OF MAIN ISSUES**

- 1.1 The application is being presented to the Planning Committee due to the number of objections received (eight) and 2 councillor call-in requests: Cllr Wemyss on the basis that the scale of development would impact on neighbours' right to privacy and put a strain on the sewerage system in the area, and Cllr Payter-Harris on the basis that the proposal is grossly over-developed and the scheme is as bad as the previously rejected application.
- 1.2 The main issues for consideration in the determination of the application are as follows:
  - Principle
  - Design
  - Impact on neighbour amenities
  - Parking
  - Impact on Special Protection Areas
  - Other material considerations
- 1.3 Site and surroundings
- 1.4 The site is currently vacant having been last used as the operational offices for a home care service, a use which is now likely to fall under Class E (commercial, business and service uses) of the 2020 Use Classes Order.
- 1.5 The site lies within the secondary area of North End District Centre (Policy PCS8 of the Portsmouth Plan applies).
- 1.6 Residential uses are immediately adjacent and to the rear (fronting Montague Road).
- 1.7 Proposal

1.8 The application seeks planning permission for the change of use from Class E offices to a 13 bedroom House in Multiple Occupation (Sui Generis), with associated works to include alterations to the frontage, fenestration changes and the construction of front and rear dormers. The application is a resubmission following the refusal of an earlier application for a 16 bedroom house in multiple occupation under ref: of 22/00338/FUL.

1.9 The revised application seeks to address the reasons for refusal in the following ways:

- Reduction in the number of bedrooms from 16 to 13
- Significantly reduced length of the rear dormer
- Amendments to the internal layout
- Obscure glazing in places to reduce direct overlooking
- Alterations to the internal courtyard layout, including a covered outside seating area at the eastern end
- Improved elevational treatment fronting London Road
- Relocated recycling/waste bin storage to front within building.

#### 1.10 Relevant Planning History

1.11 22/00338/FUL - Change of use from professional service unit to 16 bedroom house in multiple occupation (sui generis), to include associated alterations to frontage, and construction of single storey extension to rear and dormers to front and rear roofslopes - Refused dated 30/9/22 for the following reasons:

1. The proposed development by reason of its cramped layout, excessive roof additions to the rear and intensive use of the site would not result in a good standard of living environment for future occupiers of the development due to poor outlook and available light, an unacceptable sense of enclosure, and excessive noise, disturbance and loss of privacy for bedrooms in relation to other bedrooms and the proposed amenity space, cycle and bin storage. The proposal is therefore contrary to Policy PCS23 of the Portsmouth Plan and the aims and objectives of the National Planning Policy Framework (July 2021).

2. The proposed second floor rear dormer is considered a visually top heavy and bulky addition, resulting in an incongruous feature within the area, out of character with surrounding development. As such it is considered contrary to Policy PCS23 of the Portsmouth Plan and the aims and objectives of the National Planning Policy Framework (July 2021).

3. Provision for the collection of refuse and recycling is not considered satisfactory and would result in an unacceptable impact on the amenity of neighbouring occupiers and a potential hazard to pedestrians and users of the adjacent parking court. As such the proposal is considered contrary to policy PCS23 of the Portsmouth Plan and the aims and objectives of the National Planning Policy Framework (July 2021).

4. It has been identified that any residential development in the city will result in a significant effect on the Solent Special Protection Areas, through additional recreational pressures and nutrient output, with mitigation against these impacts being required. No justification or mitigation measures have been secured and, until such time as this has been provided, the proposal would have a significant detrimental impact on the Special Protection Areas, contrary to Policy PCS13 of The Portsmouth Plan (2012), the Conservation of Habitats and Species Regulations (as amended after 2017), the Wildlife and Countryside Act (1981), and Section 15 of the National Planning Policy Framework (2021).

1.12 A\*22942/N - Alterations/new shop front/change of use from shop to estate agent office - permitted 3/12/75

1.13 A\*22942/P - 2 storey rear extension to existing offices - conditional permission 28/1/76

## 2.0 POLICY CONTEXT

- 2.1 In addition to the aims and objectives of the National Planning Policy Framework (2021), the relevant policies within the Portsmouth Plan (2012) would include: PCS8 (District Centre), PCS17 (Transport), PCS20 (Houses in Multiple Occupation and PCS23 (Design and Conservation).
- 2.2 Guidance for the assessment of applications that is relevant to the application includes The Parking Standards and Transport Assessments Supplementary Planning Document (2014), The Technical Housing Standards - nationally described space standards (2015), The Solent Recreation Mitigation Strategy (2017), The Updated Interim Nutrient Neutral Mitigation Strategy (2022), and The Houses in Multiple Occupation (HMOs) Supplementary Planning Document (2019) ('the HMO SPD').

## 3.0 CONSULTATIONS

- 3.1 Private Sector Housing: The City Council Private Sector Housing team advise that this property would require to be licenced under Part 2, Housing Act 2004.
- 3.2 Waste Management Service - amended storage arrangements (received 25/4/23) for refuse/recycling are now considered satisfactory.
- 3.3 Highways Engineer

London Road is a classified road the A2047 and is an important North-South route forming part of Portsmouth's primary road network. It is a single carriageway subject to a 30mph limit and is a main bus route and part of an identified Bus Rapid Transit (BRT) corridor. Few of the properties in the immediate vicinity have off street parking provision and as a consequence the demand for parking by local residents often exceeds the capacity to accommodate this on street particularly overnight and at weekends. London Road is not located in that part of the city found to be sufficiently accessible in the parking SPD as to allow the consideration of a reduction in the residential parking expectation.

No traffic assessment has been provided however given the small scale of the development, it is considered that the proposal would not have a material impact on the local highway network.

The Parking SPD does not consider HMOs of this scale explicitly, rather is concerned with the change of use of more typical residential dwellings to HMOs and as a consequence determines a parking requirement for HMOs equivalent to that of a large residential dwelling. If interpreted literally the SPD only requires a maximum of 2 vehicle parking spaces and 4 cycle spaces for HMOs irrespective of their capacity. This is broadly equivalent to 1 space per room consistent with that expectation for a 1 bedroom flat. It is considered that a parking requirement of 0.5 spaces per room would be a reasonable expectation for HMOs of this scale. This compares with no vehicle parking proposed and 6 cycle parking spaces provided within the rear courtyard.

No parking survey information has been submitted to demonstrate on street capacity to accommodate this shortfall within a 200m walking distance. The parking demand associated with the office use will be removed, this was typically likely to occur during the day, when the demand for on street parking is likely to be minimal. However the proposal will increase the residents parking demand overnight and at weekends when the demand for parking exceeds the space available on street.

Consequently not only does this proposal not provide parking provision for the reasonable expectation of demand (say 8 spaces), it is also not compliant with the literal interpretation of the policy established in the SPD, which requires only 2 spaces. This will increase the local parking demand making it more inconvenient for local residents to find a place to park with the consequent implications for residential amenity.

This is likely to result in increased instances of residents driving around the area hunting for a parking space and choosing to park where parking is restricted at junctions obstructing visibility and increasing the risks of accidents and this should be given due weight in the determination of the application.

If minded to approve the application, a condition is requested for final details of secure cycle storage provided to the LHA and thereby implemented prior to occupation.

3.4 Regulatory Services: area of mixed residential and commercial premises at both ground floor and first floor level, so no outright objections. Owing to proximity to London Road, request noise control condition for facing habitable rooms.

3.5 Contaminated Land - Given the limited scope of works, a condition relating to land contamination is not required. However, the property is near a former coal and fuel oil distributor, and as such there is the potential for contamination to be present, an informative should be added.

#### **4.0 REPRESENTATIONS**

4.1 Eight objection letters have been received on the following grounds:

- a) 13 bedrooms is still excessive; does not address previous refusal.
- b) No parking provision - parking availability within existing residential roads (particularly Montague Road and Kirby Road) is already under significant pressure; often have to circle to find a space, concern about air pollution as a result; proposal will aggravate existing dire situation; question whether intended 'professional' occupants would cycle rather than rely on a car.
- c) Accommodation offers low standard of living - query whether bedrooms meet size standards; some bedrooms lack en-suites, one is adjacent the bin store; communal area would be in shadow much of the day.
- d) Rear access path from Montague Road too narrow for cycles; path not in ownership of applicant - only for emergency access right of way - use for any other purpose would detract from quiet enjoyment of neighbouring property at no.1.
- e) Use of rear outside space by 13 residents plus guests would cause unacceptable noise and disturbance to nearby properties and their gardens in Montague Road.
- f) Object to 2<sup>nd</sup> floor dormers which are imposing and would overlook many gardens in Montague Road.
- g) Bin storage at front looks excessive; too many bins on pavement on collection day - concern about blocking access and overflowing.
- h) Too many HMO's in area already; many buildings in area converted to residential; no.6 Montague Road is an HMO.
- i) Increased pressure on sewer system.
- j) Increased pressure on public services such as local health services.
- k) Disruption during construction period.

#### **5.0 COMMENT**

The main issues to consider in the determination of this application is whether the proposal is acceptable in principle.

5.1 Principle

Five year Housing Land supply.

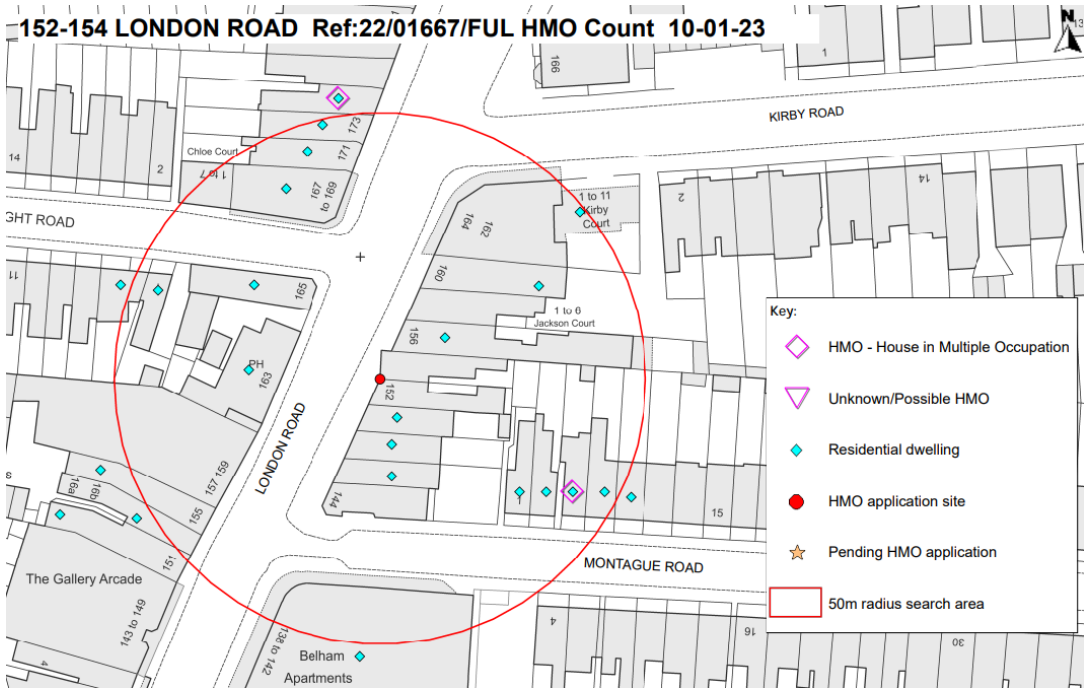
5.2 The National Planning Policy Framework (NPPF) states that planning decisions should be based on a presumption in favour of sustainable development (paragraph 11). That presumption does not apply where the project is likely to have a significant effect on a 'habitats site' (including Special Protection Areas) unless an appropriate assessment has concluded otherwise (paragraph 182). Where a local planning authority cannot

demonstrate a five year housing land supply of deliverable sites, the NPPF deems the adopted policies to be out of date and states that permission should be granted for development unless:

- I. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
  - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 5.3 Currently, the Council can demonstrate 2.9 years supply of housing land. The starting point for determination of this application is therefore the fact that the authority cannot demonstrate a five year supply of housing. This development would provide greater occupation of the building, so make an additional contribution towards the City's housing needs, at a sustainable location in the city, with good public transport, retail and services, employment, leisure, health facilities, etc.. These factors weigh in favour of the proposed development. The further, specific impacts of the proposal must still be considered as to whether the development is appropriate in detail, as set out below.

#### HMO Policy

- 5.4 The application site is situated within the secondary area of North End District Centre (Policy PCS8 applies) where the loss of upper floor office use is generally resisted, yet residential use is also supported. It is understood 'Mayfair Homecare' used the ground floor as offices and upstairs was predominantly ancillary storage. The loss of the upper floor use to residential use is not considered harmful to the overall aims and objectives of Policy PCS8. Residential use at ground floor level is acceptable under the policy PCS8 as the site lies within the secondary area.
- 5.5 Policy PCS20 of the Portsmouth Plan states that applications for change of use to a HMO will only be permitted where the community is not already imbalanced by a concentration of such uses, or where the development would not create an imbalance. The adopted Houses in Multiple Occupation SPD (as amended October 2019), sets out how Policy PCS20 will be implemented and details how the City Council will apply this policy to all planning applications for HMO uses. The SPD states that a community will be considered to be imbalanced where more than 10% of residential properties within the area surrounding the application site (within a 50m radius) are already in HMO use.
- 5.6 There are 2 known HMO's in the 50m search area of 88 properties (175 London Road - a Class C4 HMO permitted under 17/01297/FUL, and 5 Montague Road - a Class C3/C4 HMO permitted under 15/01916/FUL). Whilst representations have referred to the HMO at no.6 Montague Road (a Class C4 HMO permitted under 14/01525/FUL), this property is outside the search area for the purposes of the HMO calculations. Therefore, there are currently 2.27% of residential properties known to be in HMO use at present, rising to 3.4% if this application were permitted. This is well below the 10% threshold set out in Policy PCS20.



5.7 The HMO SPD also describes a number of circumstances where new HMOs are considered not desirable, such as where they 'sandwich' single household dwellings between HMOs or create a number of HMOs next to each other. This proposal does not result in either of these circumstances occurring.

5.8 Design - layout/room sizes

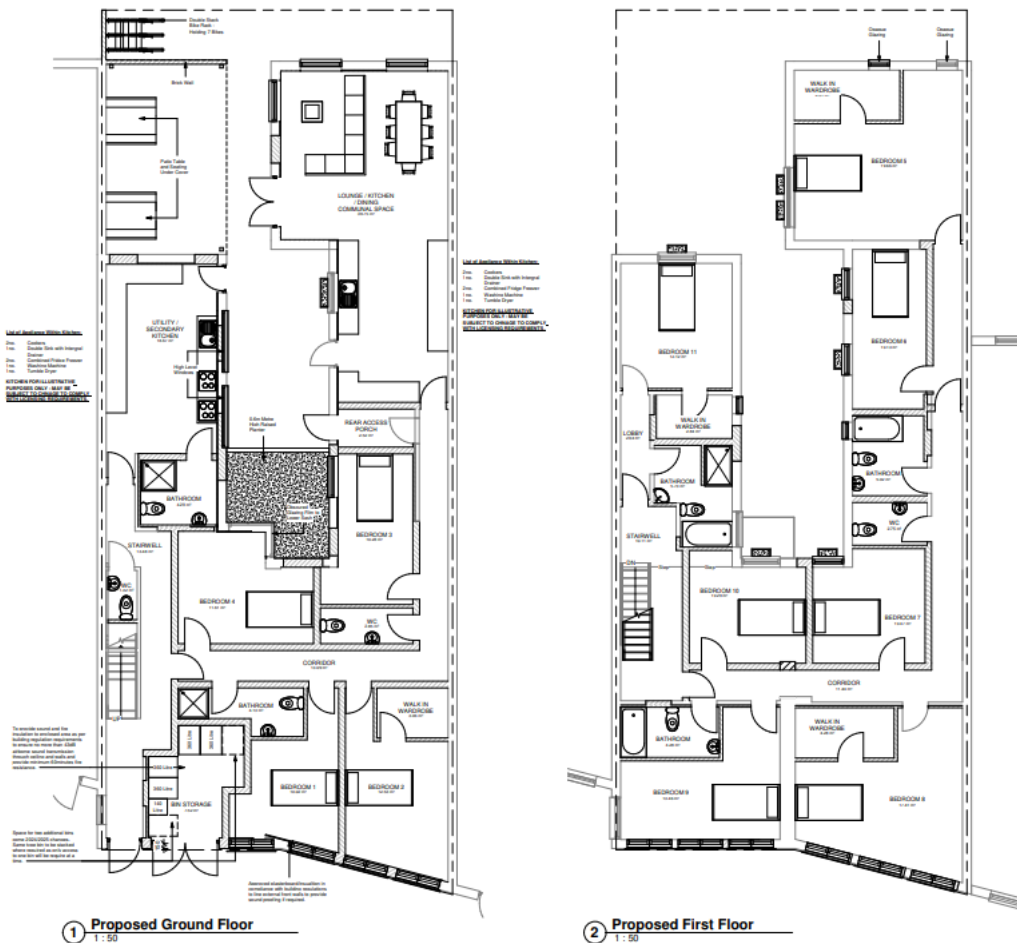
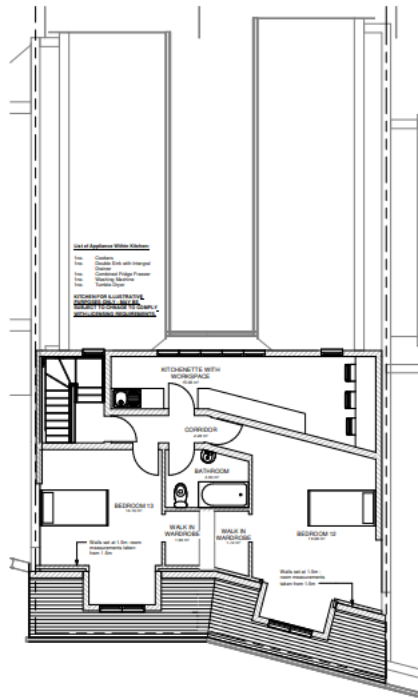


Figure 1 - Proposed Ground and First Floor Plans



1 Proposed Second Floor

Figure 2 - Proposed Second Floor Plan

- 5.9 The communal facilities are provided in three areas - two on the ground floor (39.75m<sup>2</sup> and 18.67m<sup>2</sup>) and one on the second floor (15.06m<sup>2</sup>) with a combined floorspace of 73.48m<sup>2</sup>. All bedrooms would be over 10m<sup>2</sup> and the property would not provide a separate living space (it being combined with the kitchen and dining space on the ground floor). Therefore, with reference to the HMO SPD - the minimum requirement of combined living space for 6 or more persons is 22.5m<sup>2</sup>. This is achieved by just one of the communal spaces, that being the lounge/kitchen/diner on the ground floor at 39.75m<sup>2</sup>. In addition there are two further shared kitchen/utility facilities available to residents.
- 5.10 Under the current proposal the following room sizes would be provided, as compared to the minimum size prescribed in the Council's adopted guidance:

Room	Area Provided:	Required Standard:
Bedroom 1	10.02m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 2	12.53m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 2 built in wardrobe	3.06m <sup>2</sup>	No standard
Bedroom 3	10.28m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 4	11.61m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 5	19.66m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 5 built in wardrobe	4.57m <sup>2</sup>	No standard
Bedroom 6	10.13m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 7	10.47m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 8	17.41m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 8 built in wardrobe	4.28m <sup>2</sup>	No standard
Bedroom 9	13.46m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 10	10.29m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 11	12.12m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 11 built in wardrobe	2.84m <sup>2</sup>	No standard

Bedroom 12	19.08m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 12 built in wardrobe	1.72m <sup>2</sup>	No standard
Bedroom 13	14.10m <sup>2</sup>	6.51m <sup>2</sup>
Bedroom 13 built in wardrobe	1.60m <sup>2</sup>	No standard
GF shower room	4.13m <sup>2</sup>	2.74m <sup>2</sup>
GF shower room	4.29m <sup>2</sup>	2.74m <sup>2</sup>
GF WC	2.85m <sup>2</sup>	1.17m <sup>2</sup>
GF WC	1.32m <sup>2</sup>	1.17m <sup>2</sup>
FF bathroom	4.28m <sup>2</sup>	3.74m <sup>2</sup>
FF bathroom	5.73m <sup>2</sup>	3.74m <sup>2</sup>
FF bathroom	5.02m <sup>2</sup>	3.74m <sup>2</sup>
FF WC	2.75m <sup>2</sup>	1.17m <sup>2</sup>
SF bathroom	3.93m <sup>2</sup>	3.74m <sup>2</sup>
GF Combined Living Space	39.75m <sup>2</sup>	22.5m <sup>2</sup> (as all bedrooms >10m <sup>2</sup> )
GF utility/secondary kitchen	18.67m <sup>2</sup>	Not required
SF kitchenette	15.06m <sup>2</sup>	Not required

- 5.10 As is shown in the table above, the proposal results in an internal layout that meets the Council's adopted space standards and is therefore considered to result in a satisfactory standard of living environment. (The requirement for an 11-15 person HMO is 3 bathrooms and 3 separate WC's - the proposal would provide 6 bathrooms/shower rooms - all with WC's - and 3 separate WC's).
- 5.11 The bedrooms are a variety of sizes but all are considered to have adequate outlook and light, although some of those facing directly into the inner courtyard have more limited outlook than others.
- 5.12 Design - external alterations
- 5.13 The proposed dormers to the front and rear, and the alterations to the front elevation are considered acceptable in scale, materials and overall design in terms of both the recipient building, the street scene and the wider area.
- 5.14 The existing access leading to the site from Montague Road, adjacent no.1, is not within the application site and therefore cannot be relied upon to serve the development. The recycling/refuse storage is located within the envelope of the building and accessed direct from London Road. Whilst cycle storage is provided in the open space at the rear of the building, as with the majority of HMO properties within the City, residents would have to wheel bicycles from the front door through the building to the storage facility.
- 5.15 Amenity
- 5.16 It is acknowledged that a 13 bedroom HMO is likely to generate more on-site activity than the former office use, particularly during evenings and weekends and particularly within the outside space at the rear of the building. However, this is not considered likely to cause such noise and disturbance so as to justify refusal.
- 5.17 Given that the proposed rear dormer would be set back well within the site, it would be largely screened from view at ground level within neighbouring gardens to the rear by virtue of the application sites existing rear outriggers. As such it is not considered that any excessive overlooking would result from the rear dormer as proposed.
- 5.18 Parking
- 5.19 The application site does not offer any opportunity for on-site parking. Whilst it is recognised that parking availability within surrounding residential roads is limited, the site fronts London Road which is a main bus route and part of an identified Bus Rapid Transit



(BRT) corridor. Refusal of the application on the lack of parking is not considered justified given its location within a district centre able to provide local shopping and leisure needs on a main bus route into the city centre.

#### 5.20 Impact on Special Protection Areas

5.21 The Conservation of Habitats and Species Regulations 2017 [as amended] and the Wildlife and Countryside Act 1981 place duties on the Council to ensure that the proposed development would not have a significant effect on the interest features for which Portsmouth Harbour is designated as a Special Protection Area, or otherwise affect protected habitats or species. The Portsmouth Plan's Greener Portsmouth Policy (PCS13) sets out how the Council will ensure that the European designated nature conservation sites along the Solent coast will continue to be protected.

5.22 There are two potential impacts resulting from the accommodation proposed as part of this development. The first being potential recreational disturbance around the shorelines of the harbours, and the second being from increased levels of nitrogen and phosphorus entering the Solent water environment.

5.23 Officers have submitted an Appropriate Assessment, dated 26<sup>th</sup> May 2023, to Natural England and its response is awaited at the time of writing the report. The mitigation contribution for the recreation disturbance is £5,759.00 whilst a total of £12,425 is required to ensure nitrate neutrality based on 4.97kg TN/yr. The applicant is willing to make these contributions and has completed the draft S.111 Agreement awaiting Natural England's response (the consultation period ends on 16<sup>th</sup> June).

#### 5.24 CIL

Portsmouth City Council introduced its Community Infrastructure Levy (CIL) charging schedule in April 2012. Most new development which creates over 99sqm of gross internal area or creates a new dwelling is potentially liable for the levy. The proposal would result in the creation of 1 new 'dwelling' totalling 406sqm of GIA floorspace. If existing building discount can be applied to the 351.9sqm of existing GIA floorspace, the likely CIL chargeable amount will be £9,042.95. If it cannot be applied, the likely CIL chargeable amount will be £67,863.90. The application details confirm that the site is currently vacant, although it appears to be silent on the date it was last in continuous lawful use. It is open for the agent/applicant to submit any evidence to the CIL Team showing that the site has been in continuous lawful use for 6 months in the 36 months prior to the day planning permission first permits development (if granted).

#### 5.25 Human Rights and the Public Sector Equality Duty ("PSED")

5.26 The Council is required by the Human Rights Act 1998 to act in a way that is compatible with the European Convention on Human Rights. Virtually all planning applications engage the right to the enjoyment of property and the right to a fair hearing. Indeed, many applications engage the right to respect for private and family life where residential property is affected. Other convention rights may also be engaged. It is important to note that many convention rights are qualified rights, meaning that they are not absolute rights and must be balanced against competing interests as permitted by law. This report seeks such a balance.

5.27 Under section 149 of the Equality Act 2010, the Council must have due regard to the need to eliminate discrimination, harassment, or victimisation of persons by reason of their protected characteristics. Further the Council must advance equality of opportunity and foster good relation between those who share a relevant protected characteristic and those who do not. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Having had due regard to the public sector equality duty as it applies to

those with protected characteristics in the context of this application, it is not considered that the officer's recommendation would breach the Council's obligations under the Equality Act 2010.

5.28 Other matters raised in representations not yet addressed

- a) Increased pressure on sewer system.
- b) Increased pressure on public services such as local health services.
- c) Disruption during construction period.

## 6.0 Conclusion

6.1 The proposed use and associated development is considered acceptable subject to the recommended conditions and SPA mitigation secured by a S.111 Agreement.

**RECOMMENDATION I** - That delegated authority be granted to the Assistant Director of Planning & Economic Growth to Grant Conditional Permission subject to:

- (a) Receipt of 'no objection' from Natural England concerning the SPA Mitigation, and;
- (b) satisfactory completion of a Legal Agreement necessary to secure the mitigation of the impact of the proposed residential development on Solent Special Protection Areas (recreational disturbance and nitrates) by securing the payment of a financial contribution.

**RECOMMENDATION II** - That delegated authority be granted to the Assistant Director of Planning & Economic Growth to add/amend conditions where necessary.

**RECOMMENDATION III** - That delegated authority be granted to the Assistant Director of Planning & Economic Growth to refuse planning permission if a Legal Agreement has not been satisfactorily completed within three months of the date of this resolution.

## CONDITIONS:

### Time Limit

1) The development hereby permitted shall be begun before the expiration of 3 years from the date of this planning permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

### Approved Plans

2) Unless agreed in writing by the Local Planning Authority, the permission hereby granted shall be carried out in accordance with the following approved drawings -

Drawing numbers: Location Plan TQRQM21280143558942, Proposed Ground and First Floor Plans no. PG.7160.22.02 Revision F, Proposed Second Floor Plan and Elevations no. PG.7160.22.03 Revision I, and Proposed Street and Patio Elevations no. PG.7160.22.04 Revision F.

Reason: To ensure the development is implemented in accordance with the permission granted.

### Matching Materials

3) The materials to be used in the construction of the external surfaces of the development hereby permitted shall match, in type, colour and texture those on the existing building.

Reason: In the interests of visual amenity in accordance with policy PCS23 of the Portsmouth Plan.

### Noise Insulation Scheme Against Road Traffic Noise

4) Prior to the commencement of construction works a scheme for insulating habitable rooms against road traffic noise shall be submitted to the local planning authority. The approved scheme shall then be implemented before the first occupation of the building and thereafter retained. The scheme shall be designed to ensure that the following acoustic criteria will be achieved in all habitable rooms: Daytime: LAeq(16hr) (7:00 to 23:00) 35 dB, Night-time: LAeq(8hr) (23:00 to 07:00) 30 dB and LAmax 45Db.

Reason: In the interests of ensuring an appropriate living environment for those occupying the building, in accordance with policy PCS23 of the Portsmouth Plan.

#### Cycle Storage Details and Implementation

5) Prior to commencement of development, full details of the cycle storage facilities shall have been submitted to and approved in writing by the local planning authority. The approved facilities to be provided for the storage of bicycles shall be constructed and completed before the building is first occupied, or within such extended period as agreed in writing with the Local Planning Authority, and shall thereafter be retained for the continued use by the occupants of the building for that storage at all times.

Reason: To ensure that adequate provision is made for cyclists using the premises in accordance with policies PCS13 and PCS17 of the Portsmouth Plan.

#### Maximum Occupancy

6) The HMO hereby permitted shall not be occupied by more than 13 persons.

Reason: To prevent over-intensification of the use in order to preserve a good standard of living for occupiers and amenity for neighbours, in accordance with the HMO Supplementary Planning Document 2019, and Policy PCS23 of the Portsmouth Plan (2012) .

### **PRO-ACTIVITY STATEMENT**

In accordance with the National Planning Policy Framework the City Council has worked positively and pro-actively with the applicant through the application process, and with the submission of amendments an acceptable proposal has been achieved.