

## **Supplementary Housing Statement**

### **Introduction**

The Private Sector Housing team is responsible for controlling the standards of all, and licensing the largest, Houses in Multiple Occupation (HMOs).

In the East Suffolk area, the conversion of single-family houses 'dwellinghouses' (use class C3) is restricted across the previous Waveney District Council area, removing permitted development rights to convert to 'small' HMOs (use class C4), with planning permission required in all cases across the entire district for all conversions to (or construction of new) 'large' HMOs.

Applications for the creation of new conversions to HMOs in the Waveney Local Plan area, of any size, require the applicant to demonstrate "exceptional circumstances" for the development. The significant demand for, and shortage of, such accommodation is largely uncontested, as also is the significant increase in rental prices in recent years. The Planning team will be preparing, in summer/autumn 2024, a guidance note setting out what potential "exceptional circumstances" might be but the evidence is likely to include those matters of need/demand and affordability is likely to form at least part of the case for such. The Council producing – and updating regularly – basic information on single-occupancy accommodation, such as typical rental prices, the current demand (waiting list) and the availability of such accommodation would be helpful in demonstrating and enumerating that need. This information could therefore be used by potential applicants to help demonstrate potential "exceptional circumstances" for new HMOs.

### **Current situation**

Historically, in the early 1990s, and prior to the current of legislation applicable to HMOs, the creation of new HMOs was actively discouraged, with discretionary grants having been made available to owners of HMOs to convert their premises to make them self-contained.

Over-saturation of discrete areas of the former Waveney district, which had led to amenity issues, issues with anti-social behaviour, parking and increased levels of activity and nuisance was addressed by creating what are referred to as 'Flat Saturation Zones' in the Waveney Local Plan 2019 (Policy WLP8.4). Applications for further conversion to flats or HMOs here are not permitted, but applications for self-contained flats outside these zones will be permitted, provided various conditions are met. Any applications for the conversion of buildings to new HMOs must demonstrate "exceptional circumstances" (also Policy WLP8.4).

The Suffolk Coastal Local Plan does not have such a strict approach to conversions of buildings to HMOs (Policy SCLP5.12), instead simply requiring the character, design, parking and accessibility to services and employment centres to be appropriate.

### **Affordability**

HMOs represent some of the smallest and cheapest accommodation within the East Suffolk area. However the accommodation available is limited, and with little-to-no single room accommodation in the social housing sector, there is a significant need for this size accommodation in the private rented sector.

Since [2012](#), single people under the age of 35 have only been able to claim housing-related benefits at what is known as the single room rate. In February 2024, DirectGov confirms that the Local Housing Allowance rate for a property in the North Lowestoft urban area was £81.50 per week, equating to approximately £353 per month, a shortfall of £153 against an average rent of about £510 for a one-bedroom privately rented property, according to the Office of National Statistics. This example is in an area where the rents are the lowest, with disparity only increasing elsewhere in the district, where market rents are higher.

## **Housing Need**

Housing need within the local area is gauged by the number of active applications on the local housing register. East Suffolk Council is a member of the Gateway to Homechoice, which manages the register for seven Local Authority areas.

In February 2024 (as at 16/02/2024), in the North and South Lowestoft urban areas alone, there were 286 new applications for housing by people under 35, requiring single-room accommodation. In April 2024, the total number of people under 35 applying for one-bedroom accommodation across the East Suffolk district was 514. With Lowestoft representing approximately a quarter of the population of the district, this is a disproportionate number of applications, reflecting the relative deprivation of the town. In total across the district, approximately 2124 are on the local housing register seeking single-room accommodation.

## **Other specific local needs**

### Student accommodation

East Suffolk College (which has a Lowestoft campus) delivers three cohorts of maritime training students every year, with an intake of twenty foreign students per cohort, studying for three months at a time. These students generally come from the Indian subcontinent, and culturally look to share accommodation both for religious, camaraderie and cost reasons.

Anecdotally, the PSH team has, on multiple occasions, found that the accommodation available to these students is in poor condition, having been converted without the relevant statutory consents and permissions and presents a real danger to the health and safety of the occupiers.

Being able to secure good quality HMO accommodation would provide much needed bedspaces for these students, which can be managed well and continue to encourage further cohorts for future training cycles. This is supported by a direct enquiry by the College in 2021, seeking advice on availability of properties in the private rented sector, due to the lack of landlords / properties available in the immediate area.

### Supported accommodation

East Suffolk hosts a number of large premises that are run by not-for-profit organisations such as Access Community Trust, who accommodate residents who require support for a variety of different reasons. These premises, because they are not run by a local authority, the Ministry of Defence, or other exempted organisation, are obliged to operate as HMOs within the statutory definition and in most cases, require licensing.

It is not clear that all of these premises have appropriate planning consents in place, as commonly they are in buildings which have been used for other purposes in the past, such as care homes, etc. Should a building of this type require to make an application to regularise their planning use, there is the risk that refusal could displace a number of hard-to-house residents.

#### Risk of reliance on short-term accommodation

Where applicants may not be able to find suitable accommodation in the private rented sector, they may choose to seek shared lodgings by way of websites such as [Spare Room](#). These methods of letting are largely unregulated, with Suffolk Fire and Rescue Service recently introducing these types of property into their audit regime, following the recognition not all tenants/lodgers are aware of the regulatory requirements incumbent on their landlord in relation to health and safety, licensing etc.

The attraction of these properties is convenience and cost. On 28 March 2024, [Spare Room](#) was advertising properties in the Lowestoft area for between £100-£165 per week (£433-£715 per month), inclusive of all bills. Whilst many arrangements will be successful, there is a substantial risk that tenants will not be provided appropriate tenancy agreements, and will put themselves at risk of becoming homeless without the relevant legal protection a tenancy agreement can provide.

## Appendix A – Key Single Bed Accommodation Housing Information

Information last updated May 2024

### Housing register numbers (source: East Suffolk Council Gateway to Homechoice team)

	Total number of applicants	Applicants under 35 years of age
East Suffolk District area	4579	840
Lowestoft	1212 with a local connection	226
Felixstowe	479 with a local connection	84
Southwold	38 with a local connection	6

### Typical rental costs (sources: spareroom.co.uk, rightmove.co.uk)

Rightmove.co.uk

Whole of Suffolk: £87.00 to £462.00 per week

Spare room.co.uk

Lowestoft: £110.00 - £253.00 per week

Felixstowe: £110.00 - £150.00 per week

Other areas or sources (*include as relevant*):

Southwold: No rooms advertised

### Local Housing Allowance rates

[Lowestoft and Great Yarmouth Broad Rental Market Area](#): £86.61 per week

[Ipswich Broad Rental Market Area](#): £84.35 per week

Other areas (*include as relevant*):

None