

You hopefully will have received a Planning objection from a Mrs Alison Edwards who lives on Park Road The Planning application is number DC/20/2593/FUL

I can confirm that I am as one of the ward councillors supporting Mrs Edwards on her objection and I hope that the committee will also support the refusal especially and Harbour ward councillors who serve on the planning committee.

As I can't speak to this I will be watching on youtube

Could you please send me back a receipt of this email

Best Regards Cllr Keith Patience Harbour and Normanston  
Councillor

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Dear Sarah,

I understand a meeting will be held next Tues 11th August to discuss the planning application recently received for Highdene, 105 Park Road, Lowestoft, NR32 4HU. Ref No DC/20/2593/FUL

As a an immediate neighbour to the property I would very much like our objections in regards to this application be taken in to consideration during the meeting as it has potential to be a detrimental impact on us as a family home, and in addition has raised some serious safeguarding issues for us.

Our objections sent to the ECS planning department this morning are outlined below and supporting images attached.

Many thanks for your time and assistance with this matter.

If you would be able to let me know if this would be possible I would most grateful.

Kind regards

Mrs Alison Edwards

107 Park Road, Lowestoft, Suffolk, NR32 4HU

**Sent:** 05 August 2020 09:28

**To:** [planning@eastsuffolk.gov.uk](mailto:planning@eastsuffolk.gov.uk)

**Cc:** [keith.patience@eastsuffolk.gov.uk](mailto:keith.patience@eastsuffolk.gov.uk); [peter.aldous.mp@parliament.uk](mailto:peter.aldous.mp@parliament.uk); [Neil Edwards](#); [Bob Edwards](#)

**Subject:** DC/20/2593/FUL - Objection from 107 Park Road

**Importance:** High

**For the attention of:** Planning Department – East Suffolk Council

**Planning Application Reference No:** DC/20/2593/FUL

High Dene, 105 Park Road, Lowestoft, Suffolk, NR32 4HU

**Development Proposed Change:** Change of use from C2 residential care home to large HMO (Sui-Generis category) – supported housing for people with complex needs.

In reference to the planning application DC/20/2593/FUL we would like to notify you of our formal **Objection** to this proposal.

Our comments to accompany this objection are as follows:

**1. Waveney Area Local Plan, March 2019 – Planning Policy WLP8.4 Conversion of properties to flats**

*8.24 Conversion of larger properties to flats and smaller units can provide much needed smaller units of accommodation. However, where high concentrations of conversions to flats or houses in multiple occupation have taken place this can bring about amenity issues. These include on street parking, bin storage and increased levels of activity and disturbance. In some cases high numbers of flats can be associated with low levels of owner occupation which can result in lower maintenance standards and environmental decline. The cumulative conversion of larger dwellings to flats can reduce the number of larger family dwellings in an area which can result in unbalanced communities.*

*8.25 Some areas of Lowestoft have been subject to high numbers of flat conversions and are considered to be at saturation point when considering the above issues. In these areas further conversions should be resisted. The point at which saturation occurs will vary according to historical and local characteristics of the street, but 20% of properties converted to flats has been held to be a general guide.*

*Policy WLP8.4 – Conversion of Properties to Flats*

*Flat Saturation Zones are identified on the Policies Map.*

*No further conversions to self-contained flats/houses in multiple occupation will be permitted in Flat Saturation Zones on Lyndhurst Road, part of Denmark Road, part of London Road South and part of Kirkley Cliff Road, Grosvenor Road, Cleveland Road and Windsor Road where saturation levels are exceeded.*

*Outside the Flat Saturation Zones planning permission will be granted for conversion of existing buildings to fully self-contained accommodation where the saturation figure for the street does not exceed 20% and residential properties are above average size (i.e. above 160sqm original gross floorspace and include at least 5 bedrooms), no longer suited to family occupation or have a long established use (i.e. 10 years or more) as a House in Multiple Occupation or flats. The property should be located in a commercial, mixed use or other area close to services and facilities, be able to meet existing standards for parking, amenity areas, refuse bin storage and sound insulation and have no significant detrimental impacts to adjoining family houses.*

*Exceptional circumstances will need to be demonstrated for the conversion to Houses in Multiple Occupation or bedsits, as opposed to self-contained flats, to be permitted.*

The proposed change of use to a large HMO is at variance with the Waveney Local Plan, March 2019.

- a) **No exceptional circumstances** have been submitted or demonstrated with the application for a change of use to a 'large HMO'

- b) **Unbalanced community** – proposed change of use for supported housing would over saturate an area that already provides a large quantity of temporary and supported housing.
- i. Abigail Court, Park Road, NR32 4HU – large complex consisting of multi-self-contained flats providing temporary and supported accommodation
  - ii. Avenue Mansions, Royal Avenue, NR32 4BP – Supported housing providing 5 one bedroom flats and 3 bedsits

Both premises are within less than a ¼ mile radius and to provide another within the same small radius will increase an already unbalanced community. Pls see image 2 attached which provides evidence that the type of housing tenure has already become unbalanced.\*

- c) **Safeguarding** - We are severely concerned for our family's safety and well-being. As parents to two young children we would like to raise a safeguarding issue in respect to the applicants proposed use – Supported Housing for people with complex needs. We understand the application has been made by The Stone Foundation, who will lease and rent the premises, and states in their supporting document that Mavam will be providing the support. Mavam's own website states:

*"We support people who have complex needs and may present with higher risk behaviours."* <http://mavamsupportedhousing.co.uk/> (As of 3rd August 2020)

We are situated directly next door with a period brick wall of approx. 6ft high, which could be easily breached and our children's safety compromised within their own home/safe space. We also have several bedroom windows that overlook our garden. Pls see attached image 1 for supporting evidence.

The supporting document attached to the proposal also states the premises would be staffed 24/7 but there is no detail of staff/ratio management, details of how the residents would be managed, no impact assessment or report and definition of types of 'complex needs', in fact the opposite, I quote from the last paragraph, 'Residents come from all walks of life – they don't put people into boxes – as long as they have a need which Mavam can support'. Therefore rendering the proposal unsuitable from a safeguarding perspective and will have a 'significant detrimental impact to us as an adjoining family home'.

- d) **Flat saturation over 20%**. Please see image 3\* as evidence that postcode NR32 4HU is in a heavily saturated area of flats which has resulted in a rise of neighbourhood disturbances, in-appropriate behaviour, anti-social behaviour, criminal activity including drug dealing and participation.

## **2. Waveney Local Plan, March 2019 – Conservation Area**

*8.227 Conservation areas are designated Heritage Assets and are afforded a high level of protection in national planning policy. Conservation areas are identified on the Policies Map and are located in Beccles13, Bungay13, Ellingham13, Halesworth, Holton, Homersfield, Lowestoft (North and South), Oulton Broad13, Somerleyton13, Southwold, Southwold Harbour, Walberswick Quay, Wangford, Wissett and Wrentham.*

*8.229 Policy WLP8.39 sets out the local approach for the management of development within the Conservation areas in order to avoid and reduce harm and to enhance the integrity of the areas. The policy requires that proposals within conservation areas take into account the Conservation Area Appraisal and Management Plans in order to conserve and enhance the areas.*

High Dene, 105 Park Road, Lowestoft, NR32 4HU is within North Lowestoft's conservation area. A change of use from care home to a large HMO to provide more supported housing within the area would over saturate a residential road and create a very unbalanced community, which would be in variance to the Conservation Area policy WLP8.39 by causing harm and not preserving the integrity of the area.

### **3. Parking**

- a. Proposed plans for 4 onsite parking spaces are not feasible. The 2 spaces either far side of the driveway would cover the two entrances to the property not allowing parked cars to enter or exit the property as proposed.
- b. Current refurbishments to the property have created a second entrance/exit drive through style driveway. However there is no drop down kerb to accommodate the 2nd entrance/exit point created. Current contractors/builders on-site are already using the drive in this way where there has been no authorised usage.
- c. As there has been no detail attached to the application to feasibly support off-street parking or clarify the number of staff, visiting supporting staff, resident parking and visiting friends and family there is potential risk of increased traffic and parking in a busy residential road that already provides mixed facilities and housing.

### **4. Future concerns of a Large HMO – Sui-generis category**

There are no documents attached to provide any protection of use if The Stone Foundation decides to terminate their intended lease of the property. Subjecting the property and residents to have no understanding what the property could be used for in future.

If the large HMO proposed use is granted we have every right as residents to be concerned that this could very well be used as a similar establishment without staff onsite and additionally has every potential to attract a private sale for residential HMO lease.

### **5. Noise disturbances**

Being within such close proximity the change of use to multiple occupancy will certainly have an impact on noise disturbances to ourselves and neighbouring properties, and have potential to become out of hand. Its current usage as a care home has always provided a peaceful setting and attracted us to the property as a family with young children, and is starkly different in character to a house of multiple occupation for people with complex needs.

### **6. De-value property and area**

All the above points will create a direct impact on property prices within the immediate area.

In summary we strongly object to this application and believe this proposal to be variant to the Waveney Local Plan, has in-sufficient supporting information for the council to make an informed decision and causes serious safeguarding issues to adjoining family homes and the residential area as a whole.

We have already experienced the rise in anti-social behaviour and criminal activity within our area, which now predominantly stems from Abigail Court. Our most recent experience of such an example is of a female Abigail Court resident who chose to defecate on the path immediately

outside our properties (107 & 109) in broad daylight whilst her associate handed her leaves off our trees to clean herself up and then proceeded to leave all her said mess over the public pathway. The police were called on this matter if cross referencing is required but incidents such as this demonstrates that behaviour outside of establishments cannot be controlled and is detrimental to local resident's well-being and safety.

I would also like to point out the alley-way that runs to the rear of Park Road and Royal Avenue is also of concern as this is an ideal place for anti-social/criminal behaviour to occur and is regularly used by children as a safe haven away from the busy road.

\*Screenshot images attached taken from <https://www.streetcheck.co.uk/postcode/nr324hu> on the 2nd August 2020 – StreetCheck use data collected from a variety of official government databases, including census information and Land Registry data.

Yours Sincerely

Mr and Mrs Edwards

107 Park Road, Lowestoft, Suffolk, NR32 4HU

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Development Control and Planning

Mr and Mrs Terry

East Suffolk Council

108 Park Road

Riverside

Lowestoft

4 Canning Road

Suffolk

Lowestoft

NR32 4HU

NR33 0EQ

6<sup>th</sup> August 2020.

Dear Sir,

**PLANNING APPLICATION REFERENCE DC/20/2593/FUL**

**HIGH DENE, 105 PARK ROAD, LOWESTOFT, SUFFOLK, NR32 4HU**

**PROPOSED CHANGE OF USE FROM C2 RESIDENTIAL CARE HOME TO LARGE HMO (SUI-GENERIS CATEGORY) – SUPPORTED HOUSING FOR PEOPLE WITH COMPLEX NEEDS**

We write to object most strongly to the proposed change of use of High Dene, 105 Park Road.

We face onto the property with 5 of its front windows overlooking our bedrooms and living areas. This renders us in close proximity to any noise disturbances and anti-social or criminal activities that we feel must come with Mavams supported clients. The impact for us is we feel, going to be detrimental to our health and emotional well-being. We are both in our late 70s and have been shielded due to being considered clinically extremely vulnerable due to numerous health issues and disabilities and feel that if this proposed development is allowed we have a very bleak “rest of our years” to look forward to. We further base our objections on the following:

Parking is already a constant problem and looking at the plan we note 4 parking spots on the forecourt of High Dene but only one way in and out because there is only 1 dropped kerb. Even if another dropped kerb were allowed it can only mean loss of an on road parking space thus adding to what is already a chaotic parking situation. It must be acknowledged that we have a very heavy volume of traffic activity with vans, lorries and cars using Park Road to access the Chemist, Doctors Surgery, Harleston House Care Home, the Nursey, Trinity Church and Abigail Court.

Residents with Complex Needs, we have been advised will be learning difficulties, mental health, Substance abuse and ex offenders, all of which we have already residing in Abigail Court thus we therefore contend this area is at saturation point in accommodating people with such complex needs. Abigail Court have many people with the same complex needs and Park Road residents have already endured many incidents and disturbances with attempted break-ins, bricks thrown at cars and into gardens, drug dealing which has led to numerous visits from our already stretched Police Service. Accordingly the introduction of additional cases of complex needs can only impact further on us and other residents resulting in a fall in the quality of our lives. We both so appreciated seeing many residents put so much effort into restoring and refurbishing their homes, many of which are handsome period houses. Should the area be allowed to continue developing surely it could assist in the plan to lift Lowestofts profile regarding tourism/investment.

However allowing further supported housing must result in dramatic falls in our property values as well as reducing our rights to enjoy our homes and overall cannot be in the best interest of the residents of Park Road and its environs.

Yours faithfully

Mr & Mrs J.O Terry.

Email: [jackjohn43@outlook.com](mailto:jackjohn43@outlook.com)

Mobile: 07724995559

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Dear Planning,

With respect to the Planning Application: DC/20/2593/FUL for **Highdene**, 105 Park Road, Lowestoft, NR32 4HU - Change the use from a C2 residential care home to a large HMO (Sui Generis category) – Supported housing for people with complex needs.

I am Mr Robert Edwards of 110 Park Road, and I wish to OBJECT against this application for the following reasons:

A public site notice should have gone up to inform all other residents/public but this has not happened, also by letter only the boundary adjoining properties have been notified of this proposed change of use, which I think is unacceptable as this would have a severe detrimental impact to the entire neighbourhood, so should have reached to all of Park Rd, Royal Avenue and parts of St Margarets Rd as a minimum.

The owners of 105 Park Road also have a blatant disregard for any council law/approval or for us at neighbours, as the protected lime trees out the front of the property were removed, the original wooden sash windows were removed, and also the extremely ornate stain glass coloured windows at the central apex of both front and rear of the property were removed, all without any council permission or local notification.

I have a very low confidence that they would enforce any breaches of the proposed tenants agreements which would affect us neighbours, or with the ongoing maintenance of the property within the local conservation area.

Complex needs cover a wide variety of conditions such as severe mental health, schizophrenia, paedophilia, and manic depression, these are just some of the 'darker' conditions that could be housed next door to family homes with young children. There is no supporting documentation attached to the application with regards to how this would be managed, and even when management plans are placed within the premises this does not prevent disturbances or in-appropriate behaviour taking place around the area - which we often witness and will be of serious detrimental impact to the area, especially the adjoining homes and their safety and well-being, including their right to providing a safe environment for their children, needs to be considered as a high priority. The in-appropriateness of this application has been ill-thought out with regards to these issues.

Research shows these types of residents are transient and will have experienced long cycles of homelessness, so tend to have no invested interest in the neighbourhood or local area.

The approval would have a detrimental impact on the local neighbourhood and the wider area as a whole, it would raise serious safeguarding issues. Schools (Poplars, Northfields, St Margarets & Denes), Nursery and Child Care establishments all within close proximity (children in transit to these properties and in general playing/walking within the neighbourhood), raises serious fears of an increase of crime & anti-social behaviour.

Approval would also put us in jeopardy of becoming a further un-balanced community and heavily over saturate the area with sheltered, temporary and supported housing.

If approved, a much needed Residential Care Home (which this property previously provided and was renovated recently for the continued purpose of residential care) will be lost and our area impacted. There have been no exceptional circumstances demonstrated for the current usage to be removed and changed to a large HMO, which is in variation to Waveney Local Plan policy – WLP8.4

At present this is a pleasant family neighbourhood, with a good community spirit and hardworking people who respect each other's property and the community as a whole. Our neighbourhood already suffers from crime and anti-social behaviour from the numerous transient residents at Abigail Court and Avenue Mansions (Royal Avenue), we see a consistent police presence outside Abigail Court. So additional transient and complex needs residents within our neighbourhood would only exacerbate the problems we experience and have an increased detrimental impact on the area in addition to my personal mental and physical wellbeing.

Yours sincerely,  
Mr Robert Edwards,  
110 Park Road,  
Lowestoft,  
NR32 4HU,

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Mrs J Mullen - 30 Royal Avenue, Lowestoft, Suffolk, NR32 4HH

I was very surprised to find out this evening that there has been a Planning Application (DC/20/2593/FUL) submitted for Highdene, 105 Park Road, Lowestoft, NR32 4HU and to note that no Public Site Notice was not put up to advise those residents living in the vicinity.

I would like to advise you of my objections to this proposed change of use. This is an area with young families and elderly alike. It raises safeguarding issues and a that there could be an increase in crime and anti-social behaviour.

At present this area feels safe and people are happy to walk around on their own in relative safety. I have very rarely seen a police officer in this area, although I am not fool hardy and know crime does take place.

Please note my objections.

Kind regards

Jacqui Mullen

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Planning Application: **DC/20/2593/FUL**

Highdene, [105 Park Road, Lowestoft, NR32 4HU](#) - Change the use from a C2 residential care home to a large HMO (Sui Generis category) – Supported housing for people with complex needs.

I Steven and Donna Wood wish to OBJECT against this application for the following reasons:

A public site notice should have gone up to inform all other residents/public but this has not happened, also only the boundary adjoining properties have been notified of this proposed change of use, which I think is unacceptable as this would have a severe detrimental impact to the entire neighbourhood, so should have reached to all of Park Rd, Royal Avenue and parts of St Margarets Rd as a minimum.



The owners of [105 Park Road](#) also have a blatant disregard for any council law/approval or for us at neighbours, as the protected lime trees out the front of the property were removed, the original wooden sash windows were removed, and also the extremely ornate stain glass coloured windows at the central apex of both front and rear of the property were removed, all without any council permission or local notification.

So I have very low confidence they would enforce any breaches of the proposed tenants agreements which would affect us neighbours, or with the ongoing maintenance of the property within the local conservation area.

Complex needs covers a variety of conditions such as severe mental health, schizophrenia, paedophilia, and manic depression, these are just some of the 'darker' conditions that could be housed next door to family homes with young children. There is no supporting documentation attached to the application with regards to how this would be managed, and even when management plans are placed within the premises this does not prevent disturbances or in-appropriate behaviour taking place around the area - which we often witness and will be of serious detrimental impact to the area, especially the adjoining homes and their safety and well-being, including their right to providing a safe environment for their children, needs to be considered as a high priority. The in-appropriateness of this application has been ill-thought out with regards to these issues.

Also research shows these types of residents are transient and will have experienced long cycles of homelessness, so tend to have no invested interest in the neighbourhood or local area.

The approval would have a detrimental impact on the local neighbourhood and wider area as a whole as it would raise serious safeguarding issues. Schools (Poplars, Northfields, St Maragrets & Denes), Nursery and Child Care establishments all within close proximity (children in transit to these properties and in general playing/walking within the neighbourhood), raises serious fears of an increase of crime & anti-social behaviour.

Approval would also put us in jeopardy of becoming a further un-balanced community and heavily over saturate the area with sheltered, temporary and supported housing.

If approved much needed residential care beds (which this property previously provided and was renovated for the continued purpose of residential care) be lost & our area impacted. There has been no exceptional demonstrated for the this current usage to be removed and changed to a large HMO, which is in variation to Waveney Local Plan policy – WLP8.4

At present this is a pleasant family neighbourhood, with a good community spirit and hardworking people who respect each other, property and the community as a whole. Our neighbourhood

already suffers from crime and anti-social behaviour from the numerous transient residents at Abigail Court and Avenue Mansions (Royal Avenue), and see a consistent police presence outside Abigail Court. So additional transient and complex needs residents within our neighbourhood would only exacerbate the problems we experience and have an increased detrimental impact on the area in addition to my personal mental and physical wellbeing.

Yours sincerely,

**Steven&Donna wood**

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**OBJECTION** to planning application DC/20/2593/FUL | Change the use from C2 Residential care home to large HMO (Sui-Generis category) - Supported Housing for people with complex needs. | High Dene 105 Park Road Lowestoft Suffolk NR32 4HU

Dear Mr Ridley,

I seem to be having some problems with submitting my comments on the above application through the Public Access System so have decided to email the department directly.

My comments fall into three broad categories, **access to information, loss of residential / nursing care beds and impact on the neighbourhood.**

#### **Access to information**

Firstly, I only became aware of this application because a neighbour knocked on my door to tell me about it. I appreciate that not sharing a boundary with, or being immediately opposite or behind the site, I would not normally be written to directly. However, I walk past the site every day and **at no point have I seen a site notice displayed.** Furthermore, the Public Access System appears to have been updated (I can't say enhanced) to remove the ability to check if a site notice has been displayed or an advertisement published in the local press (if required). No dates are shown regarding when the Town Council were consulted so members of the public are not aware of time constraints to provide comments to them. There is also no indication of when the latest expiry date for consultation responses is. Indeed, the only indication of any consultation date appears to be the info sheet giving the date neighbour letters were sent out (no indication of final date for comment included though). Cumulatively, this gives the impression of a lack of openness and engagement with the public (on all applications not just this one).

Having looked at several officer reports on other applications I also note that there is often no indication of the dates when a site notice has been displayed even though the template used suggests it should be shown, it's just not filled in.

The other problem I am encountering is that there is some important information missing from the Public Access System, the application form and certificate of ownership are not displayed. I appreciate that with the current Covid situation there may be delays but have noted that applications received after this one do show the forms. Please could you arrange to have this corrected as a matter of urgency to help the public to properly consider this proposal.

As mentioned above, I am having difficulty submitting comments via Public Access. My previous registration information is not being accepted so I tried to re-register but have not received any email back from the system. I have now also tried to change my existing password but again no email back from the system. Perhaps you could pass this on to the I.T support team.

The supporting information submitted with the application is somewhat brief and does not provide sufficient information on which members of the public can properly consider the proposed use. I cover this more fully below.

On a more minor point, I note that one of the site plans (not the one showing the parking) is out of date as it does not show the residential property immediately to the South of the application site.

### **Loss of residential / nursing care beds**

The existing planning use of the property is residential care home.

I can tell you from personal experience that trying to find a space in a residential care home (in normal no covid times) is extremely difficult, especially in Lowestoft itself. Whilst accepting the building is currently vacant, to lose the beds to residential care use must be seen as a retrograde step.

Based on the old Waveney District, the 2001 census identified over 27% of the population were over 60 (approximately 1 in 4), 11% of whom were over 75 (approximately 1 in 10). It is no wonder then that the Ipswich and Waveney Housing Market Areas SHMA, Volume 2 – May 2017 identified, for the Waveney area, a need for 905 extra registered care spaces. The relevant paragraph is reproduced below with the Ipswich elements removed.

6.13 As well as the need for specialist housing for older people there will also be an additional requirement for Registered Care (nursing and residential care homes). According to the Strategic Housing for Older People tool there are around ..... 1,050 spaces in nursing and residential care homes in the Waveney HMA currently. Presuming the occupation rate proposed by the County Council is continued forward ..... In the Waveney HMA, it is estimated there will be a requirement from 1,955 people in 2036, suggesting an additional 905 spaces will be required over the next 22 years. This additional accommodation is required to meet the future institutional population and therefore does not form part of the new housing to meet the Objectively Assessed Need. (On a practical point, it would not be appropriate to increase the housing requirement to meet this need (as it is not housing) – although it may be appropriate to plan for the provision of this need separately).

The District-Wide Strategic Planning Policies | Waveney Local Plan | Adopted March 2019 confirms the need for an additional 905 places in care homes and nursing homes over the plan period. It goes on to say Policy WLP8.1 – Housing Mix The mix of sizes and types of units on any particular site should be based on evidence of local needs including the Strategic Housing Market Assessment and in consultation with the local planning authority.

I am not aware of the progress, if any, in providing additional beds since 2017 but it surely cannot be right to exacerbate the shortfall by allowing the loss of existing bed space. Surely there is a case, as for instance is done for leisure and tourism, to protect such an important existing use especially as this particular building has undergone extensive renovation presumably to bring it up to the standard required.

In addition, I also refer to Policy WLP8.4 – Conversion of Properties to Flats which states that “Exceptional circumstances will need to be demonstrated for the conversion to Houses in Multiple Occupation or bedsits, as opposed to self-contained flats, to be permitted.” Whilst this supports, and strongly encourages, the use of a building for self-contained flats rather than an HMO I would suggest that replacing much needed bed spaces for residential care or nursing with an HMO is at least equally, and probably more, undesirable in planning terms.

### **Impact on neighbourhood**

The supporting information is very poor and one is required to search the Mavam and Stone Foundation websites to seek out information. Whilst it is laudable that the organisations do not put people into boxes, the statement and websites seem to cover the possibility of basically anything goes with the type of people they cater for “as long as they have a need”. It is therefore a natural trait to consider the worst case scenario and develop objections based on that.

If clients are unfortunate enough to have had drug or alcohol related problems then this certainly wouldn't be a suitable location. The property is only 160m from Bell View Park, an area where drug related activities, including apparent dealing, goes on regularly. The nearest public house is only 185m from the property and there are another 4 within 500m.

The increase in accommodating at risk / vulnerable people in the neighbourhood is having a negative impact on the level of crime in the area with instances of drug taking and people lying drunk in the alley behind the proposed site becoming increasingly common.

It is accepted that people have the right to live somewhere and that support should be available but there is also a responsibility to provide a balanced community when considering planning applications. With Abigail Court and Avenue Mansions being so close to this site, and the area being on the periphery of the Lyndhurst Road flat saturation area, I would suggest that adding an HMO would result in a very unbalanced community, possibly push the number of flats above saturation levels, and so should be resisted. Combined with an increase in crime / the fear of crime, this would undoubtedly impact on the character of the conversation area.

I would suggest that should this proposal go ahead then the fear of crime and anti-social behaviour will certainly increase further in the area.

If in fact the clientele are not to include people with substance / alcohol issues or serious criminals, and permission is given, how will this be monitored and controlled in the future and what would prevent future use as an uncontrolled HMO?

The houses to the side and rear of the property will also suffer overlooking. Whilst the windows will be no different to those when used as a residential care home, the change of use is likely to make overlooking much more likely by residents than would have been the case before. This also raises the possibility of safeguarding issues, again depending on the type of residents expected.

### **Conclusion**

In conclusion, **I OBJECT** to this application and would urge the council (officers and / or members) to reject the application on the basis of

Loss of residential / nursing care beds

Loss of amenity – overlooking, safeguarding

Fear of crime and anti-social behaviour

Impact on the character of the conversation area.

Negative impact on the balance of the community – increasing flats / HMO's in the area still further.

Mr Barry Reid

24 Royal Avenue

Lowestoft

NR32 4HH

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'Highdene in Park Road is a stunning Georgian villa which when it was put up for sale by its former owners had many of the original features still in place. There was a garden that the residents of the care home to 15 residents, could relax in. It is in a conservation area which seems to be rapidly become an area where people with 'complex' needs, and homeless people are housed.

I know that vulnerable people need looking after and housing but the concentration of this type of business in Harbour Ward is becoming a serious problem. The WLP 2.9 states about the Harbour area, 'poor economic performance and high levels of deprivation', characterise it. If the new tenants of Highdene are allowed to use it for people with complex needs it will be joining Abigail Court and The Avenue, a care home and supported housing, in a rising level of accommodation for vulnerable people. How will the addition of another home for people with 'complex needs, help the regeneration of one of the most deprived parts of Lowestoft? Neighbours who have objected have mentioned a steady rise in crime in the area and feeling less safe letting their children play out.

WLP 8.4 states '**Outside the Flat Saturation Zones planning permission will be granted for conversion of existing buildings to fully self-contained accommodation where the saturation figure for the street does not exceed 20% and residential properties are above average size (i.e. above 160sqm original gross floorspace and include at least 5 bedrooms), no longer suited to family occupation or have a long-established use (i.e. 10 years or more) as a House in Multiple Occupation or flats.**

**The property should be located in a commercial, mixed use or other area close to services and facilities, be able to meet existing standards for parking, amenity areas, refuse bin storage and sound insulation and have no significant detrimental impacts to adjoining family houses. Exceptional circumstances will need to be**

**demonstrated for the conversion to Houses in Multiple Occupation or bedsits, as opposed to self-contained flats, to be permitted'**

So, although Park Road isn't a named flat saturation area it does meet the above criteria. The plans submitted by The Stone Foundation show poor accommodation. The clients will have a bedroom and an en suite, there is a shared, very small kitchen and two small lounges. The bin storage is inadequate for 15 residents, and the garden has now gone and been developed. Although the Stone foundation, on behalf of MAVAM, claim to have the best interests of their clients, how is this appropriate where their clients will be surrounded by similar people struggling to make new lives? With no real social space, nowhere to live inside, the clients will probably just roam the streets or fall into bad nearby company. Also, doctors are oversubscribed as are the dentists.

Finally, the applicants failed to inform residents about the change of use, but building work has already begun, the back extension is finished. How much of the original features remain internally is anyone's guess? I have tried to discover who bought Highdene, as it was not sold at auction last November 2019. When I tried to find out more about the Stone Foundation, who submitted the plan, their history and effectiveness, I discovered that they are listed as dissolved by Companies House and no accounts have been filed since 2013.

I think there are too many unanswered questions, such as where do these people with complex needs originate from, eg are they local, and what range of complex needs will be accommodated; what sort of help and supervision will they receive by how many staff? It appears to be a high density change of purpose and one that could tip this area over the edge in terms of cohesion.

Wendy Brooks