

## Planning Officer's Report - LDCA NOVEMBER 2025

<b>APPLICATION</b>	<b>2025/78</b> – Change of Use from Use Class D1 to "House of Multiple Occupation" (Sui Generis)
<b>PERMISSION SOUGHT</b>	Full Permission
<b>REGISTERED</b>	26 August 2025
<b>APPLICANT</b>	Head of Property, St Helena Government
<b>PARCEL</b>	LWS0022
<b>LOCALITY</b>	Ex Longwood School, Longwood (Plot LWS0022)
<b>ZONE</b>	Intermediate
<b>CONSERVATION AREA</b>	Longwood House
<b>CURRENT USE</b>	SHG Storage
<b>PUBLICITY</b>	The application was advertised as follows: <ul style="list-style-type: none"><li>▪ <i>The Independent</i> Newspaper on 29 August 2025.</li><li>▪ A site notice displayed in accordance with Regulations.</li></ul>
<b>EXPIRY</b>	12 September 2025
<b>REPRESENTATIONS</b>	None
<b>DECISION ROUTE</b>	<del>Delegated</del> / LDCA / EXCO

### A. CONSULTATION FEEDBACK

1. Sewage & Water Division	No Objections
2. Energy Division	No Response
3. Fire & Rescue	No Objection - Comments
4. Roads Section	No Objection
5. Property Division	No Objection (Applicant)
6. Environmental Protection	No Objection
7. Environmental Health	No Response - Comments
8. Agriculture & Natural Resources	No Response
9. St Helena Police Services	No Response
10. Aerodrome Safe Guarding	No Response
11. Economic Development	No Objection
12. National Trust	No Response
13. Sure SA Ltd (Telecoms)	No Objection
14. Heritage Society	No Objection
15. Maritime	Not Applicable

## B. PLANNING OFFICER'S APPRAISAL

The site for this proposal is situated at the upper side (south) of the road, east of Longwood House. The plot is designated within the Intermediate Zone.

### Diagram 1: Location Plan



## THE PROPOSAL

The Ex Longwood Primary School has been vacant for some time since becoming surplus to education requirements. It was used as temporary offices during the airport construction period but has otherwise not been in use except for some storage and has become somewhat dilapidated. The School use is within Use Class D1: Non-residential institutions with the office/storage use falling in Class B1: Business, storage and distribution, however there does not appear to be any planning history relating to the use within B1.

The proposed dormitories are more like a hostel accommodation, notwithstanding, with all occupiers sharing the same facilities, it is considered to remain overall within a House of Multiple Occupation (HMO). The proposal is therefore for a change of use from the lawful existing use as a school (Use Class D1) to a House in Multiple Occupation – HMO - (sui generis or a class of its own).

The applicant indicates that this accommodation would be provided in case any people arrive on the Chagos Islands who are unable to be return to their contrary of nationality. Such people may therefore be in need of accommodation on St Helena and this proposal is in accordance with the Memorandum of Understanding with the UK Government which requires (currently) that accommodation is made available for a period of time ending in approximately 6-months' time (albeit that this could be extended). The applicants indicate that they may then wish to use the accommodation for other purposes but recognise that this would most likely require a separate development consent.

**Diagram 2: Existing/Proposed Site Layout**



The existing site layout comprises two main buildings with three ancillary structures. There is an in-out driveway access from the public road with some limited parking provision along the driveway. The site is otherwise laid to grass with a hedge to the front/western boundary and some trees/shrubs to the rear.

**Diagram 3: 3-D View**

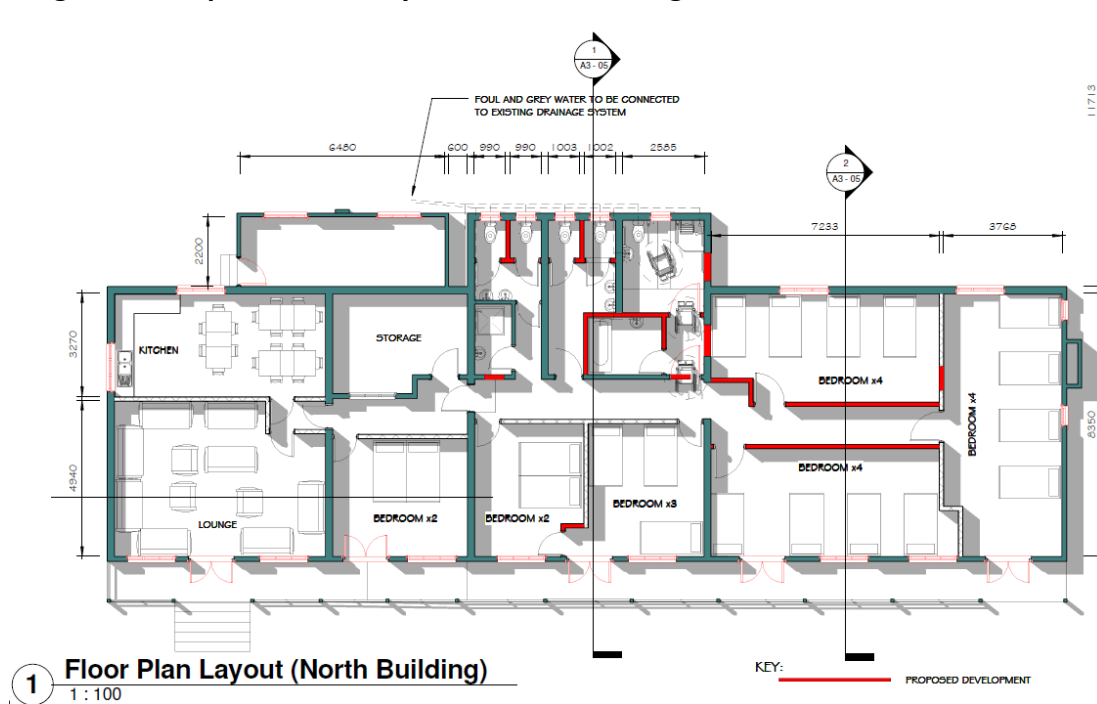


FRONT VIEW

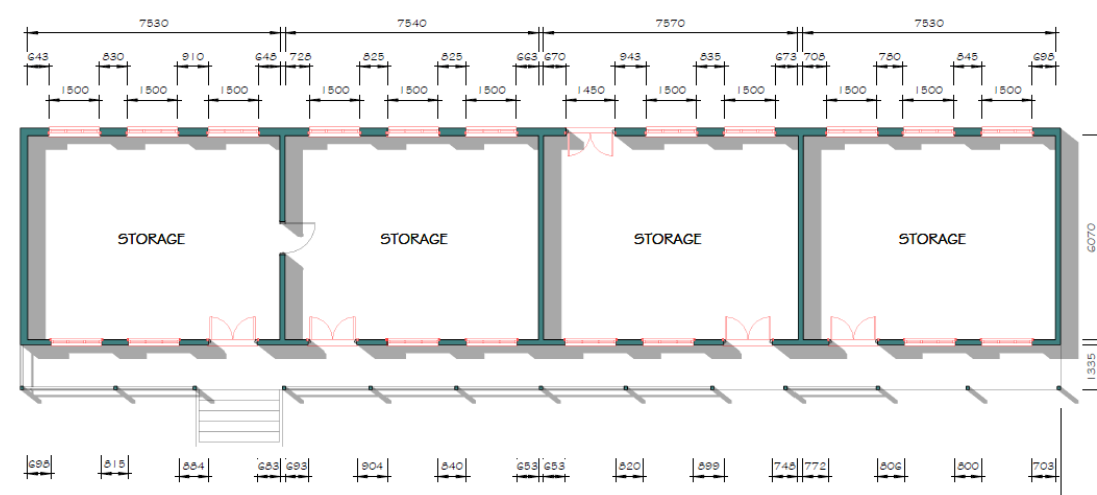
The proposal consists of internal changes to the front (north) building only with no impact on the external appearance of the building with the rear building being shown to be used as 4 storage rooms with no changes to the internal arrangements or external appearance.

The proposal would provide 3 bedrooms (2 doubles and a triple) and 3 dormitories of 4 beds each; totalling 19 bedspaces, 2 shower/bath rooms, 4 WCs, a disabled access wet-room/WC, a storage space and communal spaces providing dining/kitchen and lounge areas. An externally accessed room is not marked for any particular use. The proposal indicates new partitions to provide the three dormitories/new internal corridor and for the wet room/WC, bathroom, shower and toilets. One of the two-bed-space bedrooms would have a rear access door through the three-bed room.

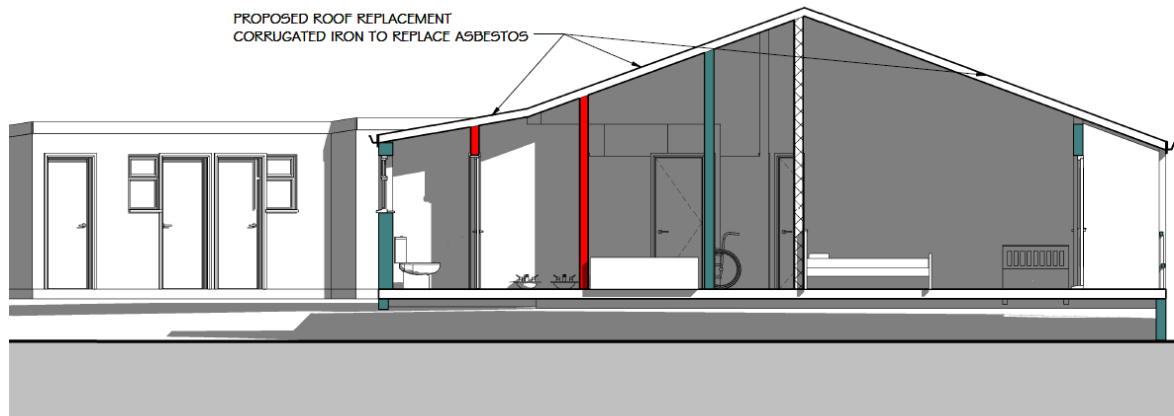
**Diagram 4: Proposed Floor Layout – North Building**



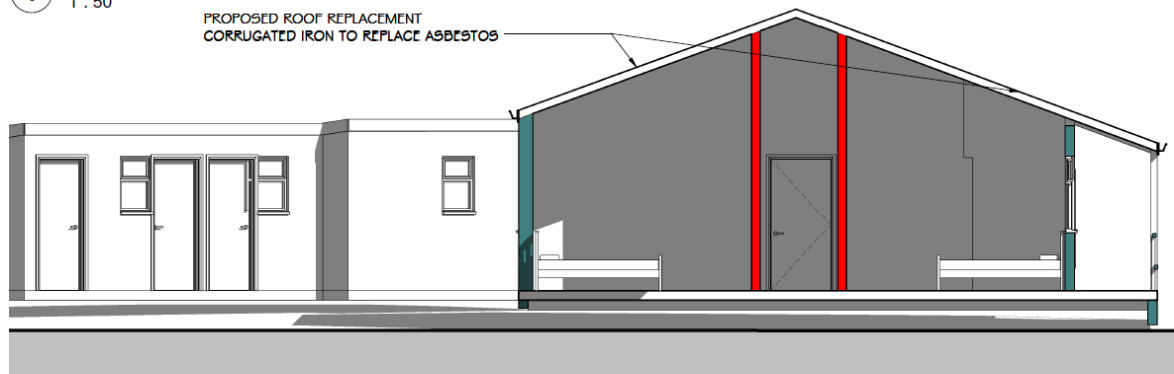
**Diagram 5: Proposed Floor Layout – South Building**



## Diagram 5: Sections



1 Section 1  
1:50



2 Section 2  
1:50

The proposed bedroom dimensions will be as follows:

- Double Occupancy Bedroom – approx. 12.2m<sup>2</sup>
- Double Occupancy Bedroom – approx. 12.2m<sup>2</sup>
- Triple Occupancy Bedroom – approx. 15.75m<sup>2</sup>

The proposed dormitories' dimensions will be as follows:

- 4-bed Occupancy – approx. 23.9m<sup>2</sup>
- 4-bed Occupancy – approx. 27.5m<sup>2</sup>
- 4-bed Occupancy – approx. 25m<sup>2</sup>

No changes are proposed to the existing arrangement for dealing with sewage as there is already an existing connection to the communal system. Rainwater and surface water from the proposed development would be collected in storage tanks.

With regards to parking, there is limited space within the property boundary with no parking spaces specifically indicated. The location is in close proximity to public transport routes used by buses.

## **STAKEHOLDER FEEDBACK & REPRESENTATIONS**

There were no representations received from members of the public. No Planning Stakeholders objected to the proposals, albeit comments from stakeholders were received as follows:

### **Fire & Rescue Services**

The St Helena Fire & Rescue Service will need to have sight of a scale plan, for the installation of passive & active firefighting media for this building, including an operational fire hydrant/s that complies with the minimum requirements in accordance with the UK fire hydrant regulations.

### **Environmental Health**

Questioned whether there is available a housing standards regulation/ policy if so does this layout is in compliance with it ?

## **POLICY CONSIDERATION**

The proposed development is assessed against the policies and guidance as set out below:

- Intermediate Zone: Policies IZ1 a, b, g)
- Social Infrastructure Policies SI1 a, b, SI.4, SI.12
- Housing Policies H1 a), b), H.9 & H.11
- Road and Transport: Policies RT7
- St Helena Housing Strategy Manual 2015

## **OFFICER ASSESSMENT**

The main aim of this proposal is to use a currently vacant property for a temporary form of housing in relation to a specific need identified as a possibility within the Memorandum of Understanding with the UK Government in relation to the. It would bring the property back into a usable condition and possibly a productive use (as needed) after a long period of vacancy.

### Principle of the proposed development

There is no specific Planning Policy relating to HMO-type accommodation, however officers have assessed this development application solely on the policies and guidance listed above.

Land Development Control Plan Policy SI.4 states that *'development permission will be granted for the expansion of Barn View, Longwood or for redevelopment of the*

*Longwood First School site as a challenging behaviour/psychiatric unit to be run in tandem with Barn View.'*

The proposal would be contrary to Policy SI.4. However, the applicant advises that in considering the need for the existing type of development as a residential care home (Use Class C2) as the future redevelopment of Longwood First School has been superseded in the intervening period by the provision of suitable alternative accommodation at Ebony View and at Piccolo Hill, which has meant that Longwood First School has been mainly vacant since the school closed. Officers consider that this alternative provision means that there is a material planning consideration which should be taken into consideration in deciding whether Policy SI.4 is no longer relevant in respect of Longwood First School redevelopment. Officer's advice that in their opinion, the Policy is not relevant in the circumstances indicated.

In considering the application for HMO-style accommodation, this is the second Development Application which has requested this type of residential accommodation. The Land Planning and Development Control Ordinance does not have a definition for a HMO, therefore as a proxy, a definition from the UK has been used by officers as follows:

**A house in multiple occupation (HMO):** *"is a property rented out by at least three people who are not from one 'household' (a household is for example a family) but share facilities like the bathroom and kitchen."*

While shared accommodation is not traditional on St Helena, the proposed use is considered to meet an identified residential need in relation to the specific Memorandum of Understanding with the UK Government.

The requirement for this type of accommodation in this case is only needed for a temporary period of 6 months. The Property section have confirmed that they would only need temporary permission for 6 months and a suitably-worded conditions is proposed to be attached.

It is therefore considered that the proposed change of use is acceptable in principle in line with Policy H1: Primary Policy for the temporary period identified.

#### Proposed layout

The proposed room sizes submitted within the plan are considered in relation to the Housing Strategy (2015). The Housing Strategy indicates for 2-bed and 3- bed houses that minimum room sizes are as follows:

- Double bedrooms - 12 sq.m
- Living rooms - 15 sq.m
- Dining Rooms - 7 sq.m
- Kitchen – 9 sq.m
- Bathroom – 4 sq.m

The proposed 2, double bedrooms would meet the minimum bedroom size indicated.

Neither Triple occupancy nor 4-person dormitory accommodation is mentioned in the Housing Strategy, however if using the UK Regulations (UK Parliament) it specifies the below for multiple occupations:

- 6.51 m<sup>2</sup> for one person over 10 years of age,

The plan submitted by the applicant offers triple occupancy at approximately 15.75m<sup>2</sup> which, using the above, would require which equates to 19.53 m<sup>2</sup> such that it is not considered is not considered that this would provide an acceptable long-term living space for three persons. Similarly, for 4-person bedrooms the UK standard would ask for a minimum of 26 sq.m; two of the three dormitories would be below this.

Kitchen/dining and living spaces are also limited.

The Housing Act 1985 would suggest that this is would be overcrowding.

While the plans provide for any disabled tenant with a dedicated disabled access wet room; no bedroom or bedspace has been specifically allocated for anyone with physical disabilities.

It is considered however, that this would be temporary accommodation in relation to a need which might not be realised. Should any people arriving on the British Indian Overseas Island need accommodation for more than in the short-term, other solutions may be needed either from the UK Government or in conjunction with St Helena.

On the above basis, while the proposal would not be in complete compliance with the design standards listed within St Helena's Housing Strategy Manual for minimum room sizes and number of occupants, it is considered that the layout in general would provide sufficient standards of domestic amenity for a temporary period in accordance with LDCP policy H1 b) iii).

#### Impact on the amenities of the surrounding area

Works to be carried out are all internal, therefore there will be no changes to the external appearance of the building, resulting in a neutral impact on the existing visual amenities. The change of use from school to HMO would result in a reduction in the

number of people on site during the day (albeit that this was some time ago) but an increase in people during the evening/night. The site is in a mixed use area and it is not considered that any noise and disturbance caused by upto 19 people at the property for a temporary period (if required) would result in significant harm, such that the proposal would be acceptable in this respect.

#### Parking/Transportation Issues

Given there is a lack of parking spaces available for this development but that this is a temporary change of use and there is no guarantee that the site would be used during the change of use, it is appropriate that any Parking, Transport or Travel Plan could be requested if the use is implemented. Subject to the attachment of a suitably-worded condition, it is considered the proposal is in compliance with LDCP policy RT7.

#### Other factors

The applicants indicate that they will carry out maintenance/repair work which would mean the building could come forward for another use in future. The building would otherwise continue to deteriorate.

The building is currently capable of being returned to a suitable on-going productive use requiring maintenance/limited works. It is considered that the proposal would enable the re-use of an existing building in an urban location which results in the sustainable use of this building while helping to protect areas such as the Green Heartland and Coastal Zones.