

# Planning Officer's Report on Modification - LDCA Special Meeting 23 JULY 2026

|                          |                                                                                                                                                                                                                               |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>APPLICATION</b>       | <b>2025/78</b> – Change of Use from Use Class D1 to "House of Multiple Occupation" (Sui Generis) - Modification 2 ( <b>2025/78/Mod2</b> ) to amend Conditions 1 and 2 and delete Condition 3                                  |
| <b>PERMISSION SOUGHT</b> | Full Permission                                                                                                                                                                                                               |
| <b>REGISTERED</b>        | (26 August 2025)/Modification request received 3.7.26 (plans received 8.7.26)                                                                                                                                                 |
| <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>       | Vacant/preparations for change of use                                                                                                                                                                                         |
| <b>PUBLICITY</b>         | The application was originally 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 (original)                                                                                                                                                                                                  |
| <b>REPRESENTATIONS</b>   | None                                                                                                                                                                                                                          |
| <b>DECISION ROUTE</b>    | <del>Delegated</del> / <b>LDCA</b> / <del>EXCO</del>                                                                                                                                                                          |

## **A. CONSULTATION FEEDBACK (Original feedback, remains relevant)**

|                                    |                          |
|------------------------------------|--------------------------|
| 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**

### **Background**

Temporary development consent was granted for the proposed change of use under Development Application 2025/78 on 10.11.25 until 09.05.26. Consent was granted on a temporary basis for two reasons: 1) that the proposed use was temporary – for a period of 6 months only at the time the application was submitted and; 2) As the accommodation was needed urgently, in line with a Memorandum of Understanding with the UK Government to provide accommodation for potential migrants from the British Indian Overseas Territory, but would provide bedspace for 19 people which would not meet the Standards in the Housing Strategy for long-term living.

A Modification request (Ref. 2025/78/Mod1) was received on 6 May 2026 to change Condition 1 to extend the time period only for upto 24 months. Given that there was little information available, the extension to the British Indian Overseas Territory (BIOT) agreement had yet to be confirmed and that the HMO accommodation would be expensive to convert to suitable social housing in future, LDCA Members considered the request under Section 30 of the LPDC Ordinance, 2012 at their meeting on 7.5.26. Given that the original temporary period was imminently due to expire, the Authority agreed (Decision Notice dated 8<sup>th</sup> May 2026) to a 3-month further time period ending on 10<sup>th</sup> August 2026 to enable the applicants to provide further information and, possibly revised plans.

This second Modification request (Ref 2025/78/Mod2) was received on 3.7.26 together with a Plan showing a different layout to the original approval. Further plans including elevations were received on 7.7.26. Revised plans were received on 8.7.26. These latter plans form the basis of this consideration. This Modification Request is as follows:

#### **Condition 1 – Extension of Time Period**

A further modification is sought to the timeframe approved under the Section 30 modification dated 08 May 2026. It is requested that the permission for the temporary change of use be extended until 30 April 2028.

#### **Condition 2 – Approval of Revised Internal Layout**

A modification is sought for consideration of a revised internal layout for the north-facing building and external changes to the building to accommodate 14 people.

### Condition 3 – Removal of Condition

It is requested that Condition 3 be removed from the permission as the revised accommodation design now complies with relevant housing standards and policy requirements.

### LOCALITY AND ZONING

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 and Longwood Historic Conservation Area.

**Diagram 1: Location Plan**



### THE ORIGINAL PROPOSAL AND MODIFICATION REQUEST

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 (an office/storage use falling in Class B1: Business, storage and distribution was indicated previously, however there did not appear to be any planning history relating to the use within B1 Use Class).

The originally approved dormitories were more like a hostel accommodation, with all occupiers sharing the same facilities. The proposed modification reduces the number

of bed spaces to 14 (from 19), increases the number of kitchen/living/dining room to 2 (from 1) but continues to have rooms with 3 or 4 bedspaces which is considered more hostel-like; notwithstanding, it is considered that the proposal remains overall within a House of Multiple Occupation (HMO). The proposal (as proposed to be modified) remains 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 country 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 (following the extension to the MoU) that accommodation is made available for a period of time ending in approximately 24-months' time. The applicants indicate that they may then wish to use the accommodation for social housing 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: Existing 3-D View



FRONT VIEW

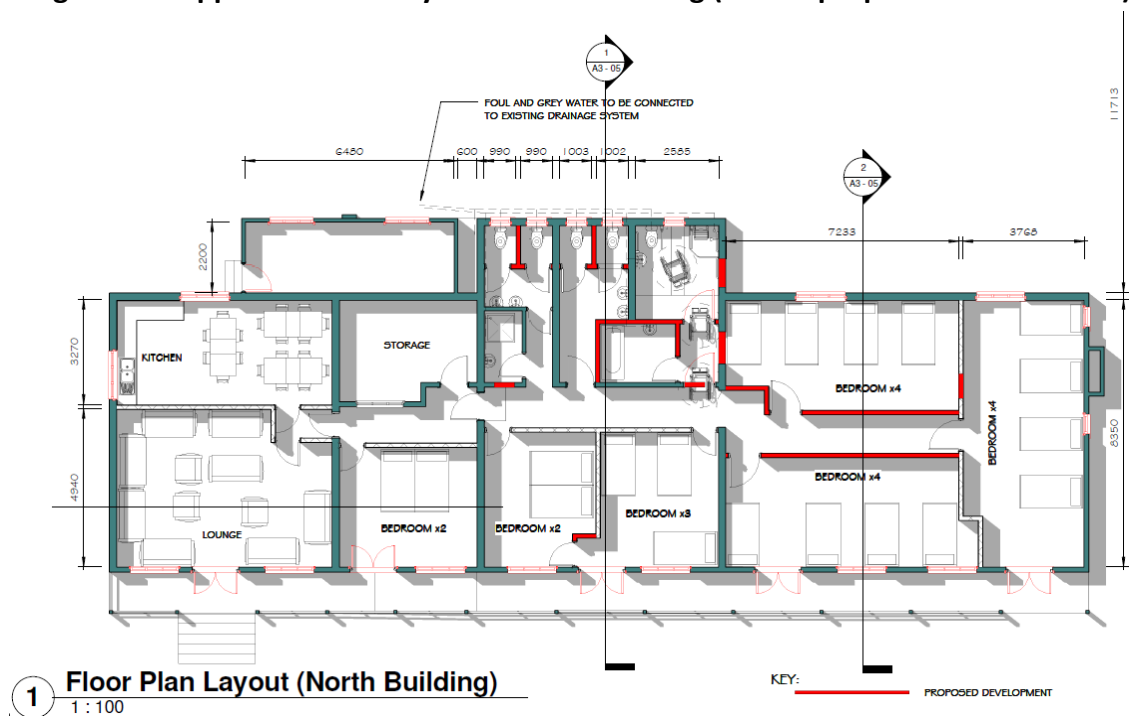
### Existing N & S Elevations:



The proposal consisted of internal changes to the front (north) building only so no proposed elevation plans were submitted. For this modification some minor changes are proposed to the external appearance of the building. The rear building was originally shown to be used as 4 storage rooms with no changes to the internal arrangements or external appearance. Notwithstanding, since this application was considered previously, an application for the conversion of the back (south) building to 2, 3-bedroom flats has been submitted (Development Application Ref.: 2026/83); this application has yet to be determined but could be used to provide additional accommodation relating to the BIOT agreement given the loss of 5 bedspaces proposed in this modification.

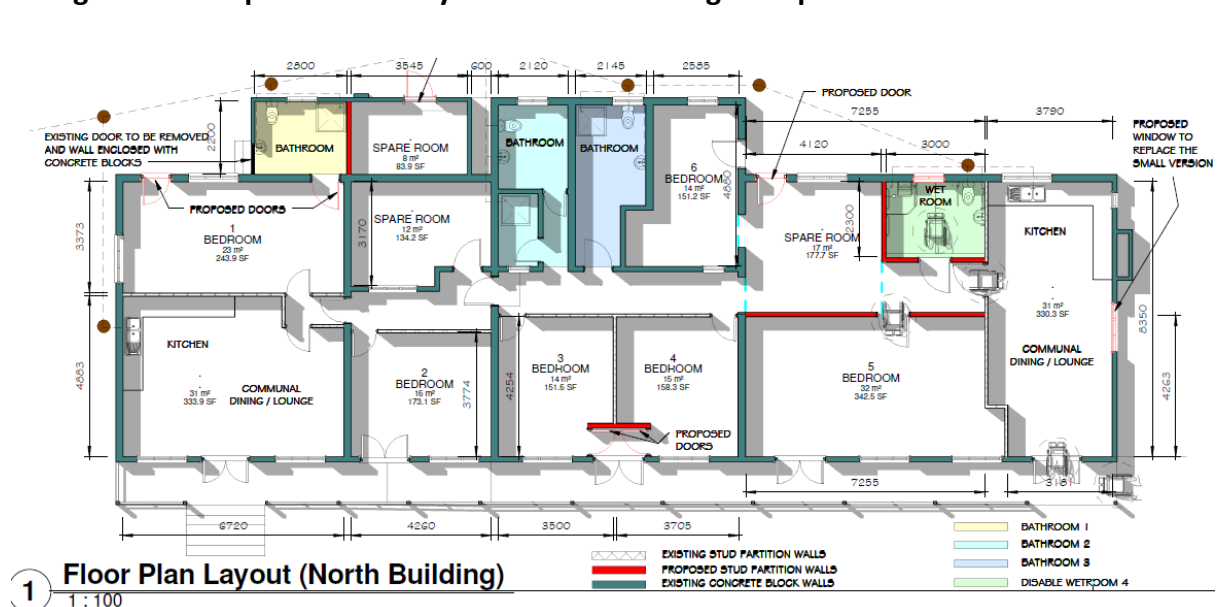
The original proposal provided 3 bedrooms (2 doubles and a triple) and 3 dormitories of 4 beds each; totalling 19 bedspaces, 2 shower/bath rooms, 4 WCs, a disabled access wet-room/WC, a storage space and communal spaces providing dining/kitchen and lounge areas. An externally accessed room was not marked for any particular use. The proposal indicated 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 4a: Approved Floor Layout – North Building (before proposed Modification)**



Modification No. 2 proposal would provide 6 bedrooms, including one dormitory of 3 beds and another of 4 beds (totalling 14 bedspaces), 4 shower/bathrooms/wet room (including one en-suite), 2 communal spaces providing dining/kitchen/lounge areas and 3 "Spare" rooms (one non-contained off the main corridor and one accessed from outside the building). The modification proposal indicates new partitions to provide the dormitory/new internal corridor etc.

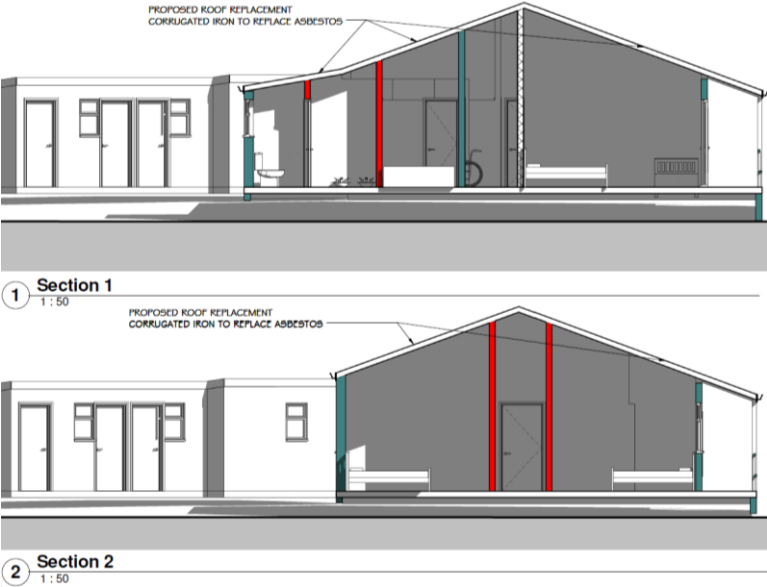
**Diagram 4b: Proposed Floor Layout – North Building – Proposed Modification**



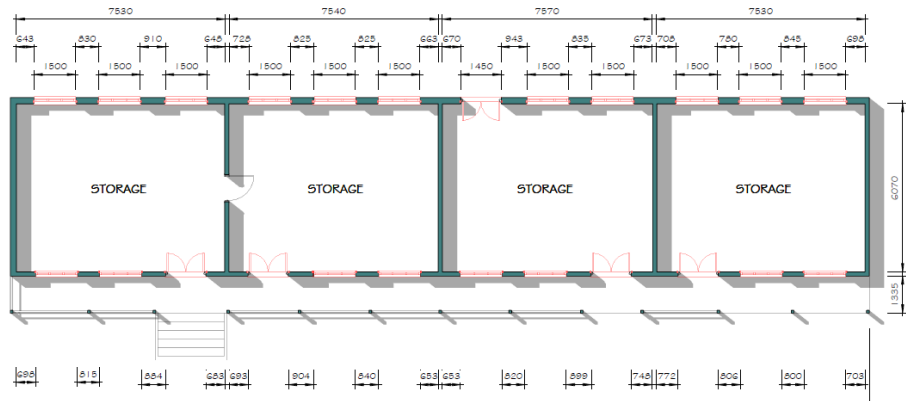
**Diagram 5: Proposed N & S Elevations (as per modification 2)**



**Diagram 7: Approved Sections (at the time of preparing this report no new sections have been provided in relation to the proposed modification)**



**Diagram 5: Approved Floor Layout – South Building (note: building is no longer part of the proposal as separate application submitted to convert to residential use)**





The proposed bedroom dimensions will be as follows:

- Bedroom 2 (2 beds) – 16m<sup>2</sup>
- Bedroom 3 (2 beds) – 14m<sup>2</sup>
- Bedroom 4 (2 beds) – 16m<sup>2</sup>
- Bedroom 6 (1 bed) – 14m<sup>2</sup>

The proposed dormitory dimensions will be as follows:

- Bedroom 1 (3 beds) – 23m<sup>2</sup> (with ensuite bathroom)
- Bedroom 5 (4 beds) – 32m<sup>2</sup>

Again, 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 and there are food and other shops and outdoor areas (Longwood Green) within walking distance of the application site.

#### The specific changes requested to the original Decision Notice

The Modification request is to change planning conditions 1, 2 and 3 of the original approval. It is not proposed to amend the other planning conditions (i.e., 4, 5, 6 and 7 – see below Recommendation section for retained wording).

To summarise, the proposed Modification would result in the following changes to the original Decision Notice:

Modify Condition 1 to the following:

This permission is for a temporary period of ~~6 months from the date of the Decision Modification Notice~~ ending on 30 April 2028

**Reason:** Given that ~~the proposal does not fully meet the Housing Strategy minimum room sizes for long term, permanent accommodation and the~~ The Memorandum of Understanding only extends for ~~6~~ 22 further months and this proposal is only considered to provide a reasonable level of accommodation (HMO/Hostel) for a limited period.



Modify Condition 2 as follows:

The development shall be implemented in accordance with the details specified on the Application Form and the Plans as stated below, as stamped and approved by the Chief Planning Officer, on behalf of the Land Development Control Authority, unless the prior written approval is obtained for a minor amendment to the approved details under Section 29 "Minor Variations" of the Land Development Control Ordinance, 2013

| Drawing No.                             | Rev | Title                                                      | Date on Plan                            | Date Received                |
|-----------------------------------------|-----|------------------------------------------------------------|-----------------------------------------|------------------------------|
| LWS0022<br>Location Plan                | -   | Location Plan                                              | 27th August<br>2025                     | 26.9.25                      |
| <del>A3-01</del> BIOT –<br>07/26 – A301 |     | <b>Plan and Elevations – North<br/>Building - Proposed</b> | <del>August<br/>2025</del> July<br>2026 | <del>26.9.25</del><br>8.7.26 |
| <del>A3-02</del>                        | -   | <del>Plan Layout – South Building</del>                    | <del>August<br/>2025</del>              | <del>26.9.25</del>           |
| <del>A3-01</del>                        | -   | <del>Elevations – Proposed</del>                           | <del>August<br/>2025</del>              | <del>26.9.25</del>           |
| A3-04                                   | -   | 3D Views                                                   | August<br>2025                          | 26.9.25                      |
| <del>A3-05</del>                        | -   | <del>Section Details – Proposed</del>                      | <del>August<br/>2025</del>              | <del>26.9.25</del>           |

**Reason:** Standard condition to define the terms of the development and to ensure that the development is implemented in accordance with the approved details.

Delete Condition 3:

~~The proposed development shall be used solely for the accommodation of for people to be accommodated under the Memorandum of Understanding in accordance with the approved details.~~

~~**Reason:** The proposed development is designed for temporary shared accommodation unsuitable for other occupation types in line with Policy H.5 of the Land Development Control Plan Adopted Revised Plan, April 2012 and St Helena Housing Strategy Manual 2015.~~

## **STAKEHOLDER FEEDBACK & REPRESENTATIONS (original feedback)**

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 ?

**In relation to the proposed modification:** There is no amendment to the description of development for the approval which is for a change of use. No consultation is required to be undertaken specifically in relation to the proposed modification and the above comments remain relevant to the change of use. However, the proposed modification will now require approval under the Building Regulations (previously exempt) which will, among others, require a fire certificate issued by Fire and Rescue Services; the layouts are considered below in relation to available housing standards, as appropriate.

## **POLICY CONSIDERATION**

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

- Intermediate Zone: Policies IZ.1 a, b, g)
- Built Heritage: Policies BH1, BH.2
- Social Infrastructure Policies SI.1 a, b, SI.4, SI.12
- Housing Policies H.1 a), b), H.9 & H.11
- Road and Transport: Policies RT.7
- St Helena Housing Strategy Manual 2015

### **OFFICER ASSESSMENT on the proposed modification**

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. 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

This has previously been approved. There is no modification change in the proposal which would affect the principle of development.

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

#### Proposed layout (as per the modification request)

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

- Single bedrooms – 7m<sup>2</sup>
- Double bedrooms – 12m<sup>2</sup>
- Living rooms – 15m<sup>2</sup>
- Dining Rooms – 7m<sup>2</sup>
- Kitchen – 9m<sup>2</sup>
- Bathroom – 4m<sup>2</sup>

The proposed 1-bed and double bedrooms would meet the minimum bedroom sizes indicated in the SHG Housing Strategy Manual.

Neither Triple occupancy nor 4-person dormitory accommodation is mentioned in the Housing Strategy, however if using the UK Regulations (The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 – which amended The Housing Act 2004)), Regulation 2 of the Regulations, 2018 it specifies for bedrooms, a minimum size for each person for houses in multiple occupation (HMOs) as follows:

***“(a)to ensure that the floor area of any room in the HMO used as sleeping accommodation by one person aged over 10 years is not less than 6.51 square metres;***

The plan submitted by the applicant offers triple occupancy at 23m<sup>2</sup> which, using the above, by using the above definition and multiplying, this would require this to equate to 19.53 m<sup>2</sup>. On a purely size basis, it is considered that the 3-person dormitory would meet the minimum space requirement for three persons. Similarly, for 4-person

bedrooms - the UK standard would suggest a minimum of 26m<sup>2</sup>; the 4-bedspace dormitory at 32m<sup>2</sup> would exceed this minimum space/person.

Kitchen/dining and living spaces have been increased from the earlier version of the proposal with two such areas now proposed. At 31m<sup>2</sup> and 31m<sup>2</sup> respectively for the two combined K/L/D rooms, this meets the St Helena Housing Strategy minimum design standards for Kitchen – 9m<sup>2</sup>, Living room – 15m<sup>2</sup> and dining space 7m<sup>2</sup> (together 31m<sup>2</sup>); and bathrooms would be at least 4m<sup>2</sup>. It is therefore considered that they would be acceptable for the purposes proposed.

The plans show provision for a disabled tenant with access into the building, one of the kitchen/dining/lounge areas, a wet room and wheelchair access into the 4-bed dormitory. While it is not ideal for physically-disabled people to share bedrooms with others, bedroom 6 could be designated to provide greater privacy for care reasons and this should be investigated, as necessary with health-care professionals, if needed. This would also mean that any conversion later into social housing would be capable of meeting requirements for wheelchair users.

It is considered that this would be temporary accommodation in relation to a need which might not be realised. The proposed modification does meet the Housing Standards (including those for larger bedspaces contained in the English Regulations which is used as a proxy). Any people arriving on the British Indian Overseas Territory needing accommodation could be provided for, at least in part, at the application site albeit that other solutions may be needed either from the UK Government or in conjunction with St Helena if the term of stay on St Helena is longer than the identified period.

On the above basis, the modifications to the original proposal would comply with the design standards listed within St Helena's Housing Strategy Manual for minimum room sizes for the 1- and 2-bedroom sizes and the kitchen/lounge/dining provision and bathroom/WC provision is considered to meet the requirements, including for wheelchair users. The proxy use of the UK standard for person space in larger bedrooms including the 3 and 4 bed dormitory provision would meet the size but still provide multi-user rooms which are only considered to provide sufficient standards of domestic amenity for a temporary period. As such, there remains a requirement to restrict the proposal to temporary provision, which is already covered by Condition 1. Therefore, while the hostel/dormitory accommodation remains generally unsuitable for long-term use by local residents in housing need (as otherwise contrary to LDGP policy H1 b) iii)), Condition 3 can be removed entirely as requested.

### Impact on the amenities of the surrounding area, including the Conservation Area

The proposed modifications include mainly internal works, however, there are also external works which include changing window openings to doors, inserting some windows and blocking in an existing door. Works to be carried out do not involve any extensions of the buildings and would not result in any loss of privacy for existing residential occupiers. It is therefore considered that the external changes would not result in any adverse impacts, including on existing visual amenities, or on the character and appearance of the Longwood Historic Conservation Area.

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 14 (previously 19) people at the property for a temporary period (if required) would result in significant harm, such that the modified 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 a Parking, Transport or Travel Plan could be requested if the use is implemented. A suitable condition has been attached to the approval and it is considered the modified proposal remains 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.