

From: Alex Firth-Williams [REDACTED]
Sent: Wednesday, May 8, 2024 6:02 AM
To: Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>
Cc: [REDACTED]
Subject: Objection to S62A/2024/0039

05/05/2024

Ref S62A/2024/0039

Application No 24/01285/PINS

Site address [396 Hotwell road BS84NU](#)

We are writing to strongly object to the planning proposal submitted for [396 Hotwell Road](#) to change the use to allow a 6 bedroom HMO.

Our property [REDACTED], one of the two terraces along Hotwell road ending at the Colonnade and Clifton Rocks Railway.

It is an 1870's terrace of nine properties. The other terrace is Georgian with 11 buildings. Both terraces overlook the river Avon and Clifton Suspension bridge.

Our objection is based on the following.

HARMFUL CONCENTRATION

The planning statement correctly points out that there are 4 existing HMOs within a 100-metre radius of the property and claims a density of 7.6% increasing to 9.6% if 396 change of use is allowed.

- 392
- 398
- 402
- 380

However, the planning statement does not include the large 8 bed student house at [372 Hotwell road](#) which meets the definition of an HMO as outlined – HMO SPD – Adopted – Final – Nov 2020

This means the concentration of HMOs is already at 9.6% and any further HMOs will push this way over the threshold of 10%

“Proposals for the introduction of new HMOs which would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application

property or site are unlikely to be consistent with Local Plan policy. In addition proposals for additional bed spaces within an existing HMO where 10% or more of the total dwelling stock is occupied as HMOs within a 100 metre radius of the application property or site are unlikely to be consistent with Local Plan policy.” HMO SPD 2020

Additionally, 374 needs to be considered. It a house managed by Alliance Housing for clients on a pathway towards independent living. And while not fully meeting the definition of an HMO it does however have many of the attributes of an HMO such as a more transient population with less community involvement and reduced social cohesion resulting from a demographic imbalance.

SANDWICHING

“4.1 Sandwiching Assessment (Street level) Proposals for the introduction of new HMOs resulting in an existing residential property or properties (Use Class C3) being sandwiched by HMOs on both sides are unlikely to be consistent with Local Plan policy.” HMO SPD 2020

The property at 394 will be officially sandwiched by 396 and 392 and therefore the application for the HMO should be rejected on these grounds alone.

Observations

The planning statement suggests that the house is unsaleable due to its location and that the house and area are not suitable for families, Painting a generally negative view of the area.

It also mentions the dangerous road, lack of parking and poor access.

There have been 5 properties sold recently in the terrace that comprises 396. Of these 4 were marketed and sold as family homes.

- 390 -2015
- 396 -2017
- 402- 2018
- 394 -2022

One other was marketed and sold as an HMO.

- 392 -2018

Clearly evidencing that well marketed properties do sell to buyers seeking good sized family accommodation, with gardens and close to Schools in the Clifton and Hotwells area of which there is a limited supply.

On street parking is available 200 metres away in and around Freeland Place.

[REDACTED]

The Planning statement also describes the road as dangerous.

However, the properties are accessed by a safe, wide, level and fenced pavement 2m above road level.

The properties are within the boundaries of the Bristol Clean Air Zone -improving local air quality – NO2 levels reduced by 26.5 % as measured at [420 Hotwell rd](#)

[Bristol City](#) Council – January 2024 Bristol's Clean Air Zone report

Conclusion

- With 3 HMOs in the terrace of Nine and a further two within a 100m radius, the threshold for HMOs has already been met.
- 394 Will be sandwiched between two HMOs
- the area has clear appeal to families based on recent sales evidence.

We hope our objections will be heard and that this planning permission will be rejected.

Should a hearing be scheduled for this application we would like the opportunity to speak at that hearing.

Catherine and Alex Firth-Williams

[REDACTED]