

**Reference:** S62A/2024/0039

**Application No.:** 24/01285/PINS

**Site address:** 396 Hotwell Road, Bristol, BS8 4NU

Date: 07/05/2024

We are writing with regards to the planning proposal submitted for 396 Hotwell Road to change the use of the dwelling to allow a 6 bedroom HMO. We are writing to strongly object to this proposal.

We base the objection on the following:

**1. Harmful Concentration - HMO Sandwich**

Currently 392 is registered and functioning as an HMO. Should the application for 396 be approved, the residential property 394 Hotwell Road will be sandwiched between two HMOs. As stated in HMO SPD [\[link\]](#):

Proposals for the development or intensification of houses in multiple occupation are unlikely to be consistent with Local Plan policy where the development would create a harmful concentration of such uses as a result of any residential property or properties being located between two houses in multiple occupation as described in section 4.1.

The sandwiching of residential property 394 Hotwell Road is unlikely to be consistent with Local Plan policy and the application should therefore be rejected on these grounds.

**2. HMO Threshold Assessment (Neighbourhood level)**

The property is located on what was formerly known as St. Vincent's Parade consisting of nine terraced houses built in the 1870s: 390 - 408 Hotwell Road. Adjoining this terrace to the south is St Vincent's Terrace which is a row of eleven Georgian houses: 372 - 388 Hotwell Road. Within point 1.6 of the planning application, three properties within St Vincent's Parade are listed as HMOs - 392, 398 and 408. The planning application hints at one additional property being an HMO on St. Vincent's Terrace. Our understanding is that there are two properties on St. Vincent's Terrace that are HMOs, number 372, and number 380. Number 372 may not be formally registered as an HMO, but it is clearly set up to be an active HMO based on the flowchart provided on page 4 of the document HMO SPD [\[link\]](#). Number 380 has just undergone extensive renovation marketing itself as an upscale student accommodation with 16 bedrooms allowing a maximum of 20 students. [\[link\]](#)

There are therefore five existing HMOs (licensed, with pending licence applications or unlicensed) in 'the linear line of existing flats, student houses and dwellings comprised within the two terraces fronting Hotwell Road and other dwellings broadly defined within a 100 metre radius of the application site'. Based on five HMOs we are already at 9.6% HMOs within a 100 metre radius of the application policy. An additional HMO would increase the proportion of HMOs to well over 10% which is unlikely to be consistent with Local Plan policy as stated on the document HMO SPD 2020 [\[link\]](#).

**3. Property Market Analysis and Recommendations**

Point 5.4 in the application document states that the property 'cannot be sold as a family home as it is not conducive to family living due to its location and parking and garden

issues'. We would like to draw attention to the fact that of the last five properties sold on this terrace, four have been sold as family homes, with one (392) sold as an HMO. [REDACTED] This suggests that there is an appetite to buy well sized affordable family housing with gardens and in the vicinity of schools.

An estate agent with more emphasis on family homes might have more success in selling the property to families as opposed to the current estate agent which appears to primarily market itself to landlords. [REDACTED]

**4. Changes to the local character and distinctiveness of the area**

Point 6.3 in the planning application states that the proposed change of use would not 'be likely to create excessive noise or disturbance to the single dwellings that do remain'. Due to the transient nature of rented properties like HMOs, it can be considered that there might be a less than ideal relationship between the tenant and the general outside tidiness. On this strip of Hotwell Road refuse is collected from bin bags which are placed directly on to the wide, fenced pavement raised 2 metres above the road. A lack of food recycling by some of the HMOs on this street regularly results in bin bags being ripped up by foxes and seagulls and strewn down the street, resulting in rat infestations. The council is regularly contacted by residents to clean up the mess. Further HMOs may well add to these disturbances. The view from Cumberland Basin towards the Clifton Suspension Bridge which also includes this terrace is one of the most iconic vistas of Bristol and it is in Bristol City council's benefit to maintain the picturesque nature of this area.

Finally, students tend to not join the resident community instead being part of the university community. With the start of the new academic year, it is likely that at least 16 students will be moving into number 380. Potentially adding another six students from this planning application will lead to an imbalanced and unsustainable community and can damage the residential amenity and character of the surrounding area. (HMO SPD [\[link\]](#))

We hope you will consider our objections and reject this planning application. Should a hearing be scheduled for this application we would like the opportunity to speak at that hearing.

Mr Jasper Deen and Dr Maria Pippias

[REDACTED]  
[REDACTED]  
[REDACTED]