

From: Jonathan Dymond [REDACTED]
Sent: Friday, May 10, 2024 1:01 PM
To: Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>; [REDACTED]
Cc: [REDACTED]
Subject: RE: S62A/2024/0039 396 Hotwell Road Clifton Bristol

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Dear Leanne,

Please find our comments on this application below:

Summary: Recommend refusal on the basis that the proposed HMO would have unacceptable neighbour amenity impacts.

Response: The NPPF highlights the need to significantly boost the supply of housing and to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy BSC18 of the adopted Core Strategy reflects this guidance and states that "all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities", with reference to the evidence provided by the Strategic Housing Market Assessment, also notes that 'developments should contribute to a mix of housing types and avoid excessive concentrations of one particular type'. The policy wording states that development 'should aim to' contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists.

Bristol comprises a diverse range of residential neighbourhoods with significant variations in housing type, tenure, size, character and quality. A wide range of factors influence the housing needs and demands of neighbourhoods. Such factors include demographic trends, housing supply, economic conditions and market operation. The inter-relationship between these and other factors is often complex and dynamic. In the circumstances, housing requirements will differ greatly across the city and will be subject to change over time. With this in mind an overly prescriptive approach to housing mix would not be appropriate. However, it has been possible to identify broad housing issues that are applicable to many neighbourhoods.

Analysis of the city's general housing needs and demands has identified a number of indicative requirements for each of 6 city zones. The zones reflect sub-market areas used in the Strategic Housing Market Assessment (SHMA). The intention is to provide a strategic steer for all sizes of residential scheme within each zone. A local area-based assessment is required to assess the development's contribution to housing mix as a smaller scale will not provide a proper understanding of the mix of that area; a larger scale may conceal localised housing imbalances. As a guide the neighbourhood is defined as an area equivalent to the size of a Census Lower Level Super Output Area (average of 1,500 residents).

Development of HMOs is covered by Bristol City Council Site Allocations and Development Management (2014) Policy DM2. The policy provides an approach to addressing the impacts and issues that may result from this form of development and aims to ensure that the residential amenity and character of an area is preserved and that harmful concentrations do not arise. This policy does not permit new HMOs or the intensification of existing HMOs where development would

create or contribute to a harmful concentration within a locality. The policy identifies a harmful concentration as a worsening of existing harmful conditions or a change to the housing mix that reduces housing choice.

The Council has adopted a Supplementary Planning Document (SPD) relevant to the determination of applications concerning houses in multiple occupation (HMOs): *Managing the development of houses in multiple occupation, SPD (Adopted) November 2020* - referred to hereafter as the SPD. The SPD provides guidance in applying Policy DM2 (see above), relating specifically to houses in multiple occupation. Please see: <https://www.bristol.gov.uk/files/documents/2671-hmo-spd-adopted-final/file>

The document recognises that HMOs form part of the city's private rented housing stock and contribute positively to people's housing choice. This form of accommodation is generally more affordable and flexible and therefore suitable for younger people, including students, and other households that are not living as families. It is however recognised that HMOs are more intensive form of accommodation than traditional flats or dwellings. Typically this increases dependent on the level of occupancy.

General issues associated with HMOs include:

- Noise and disturbance
- Detriment to visual amenity (through external alterations and poor waste management)
- Reduced community facilities
- Highway safety concerns (from increased parking)
- Reduced housing choice
- Reduced community engagement
- Reduced social cohesion

The SPD expands on DM2 to provide a definition of what represents a 'harmful concentration' in the wording of the policy. This relates to two principles; local level and area level. At local level, a harmful concentration is found to exist where 'sandwiching' occurs. This is where a single family dwelling (use class C3) becomes sandwiched with HMOs at both adjacent sites. This can happen within a flatted building with HMOs above and below also. With regards to the wider area, a harmful concentration is found to exist where a threshold proportion of 10% HMOs within a 100m radius of the site occurs. This is generally identified as a tipping point, beyond which negative impacts to residential amenity and character are likely to be experienced and housing choice and community cohesion start to weaken.

An assessment should also be undertaken as to whether shared housing is disproportionately represented in the Lower Super Output Area.

The Council also has access to data in relation to the number of Licenced HMOs (Mandatory and Additional Licences) plus any HMOs that have been given planning permission and do not currently have a licence. This data indicates that within 100m of the application site there are 58 residential properties and 2 properties in HMO use. This results in a percentage of HMOs within 100m of the property of 3.45%.

This means that the percentage of HMOs within 100 metres of the site is below the 10% desirable threshold quoted within the SPD. As per the SPD guidance, this suggests that negative impacts to residential amenity and character are not likely to be experienced and housing choice and community cohesion is not currently starting to weaken. With regards to purpose built student

accommodation, it is also noted there are no properties in use for this purpose within 100m of the site.

At street level, the SPD advises that a harmful concentration is found to exist where 'sandwiching' occurs. This is where a dwelling (Use Class C3) is sandwiched on both sides by HMOs. The HMO SPD states that a potential sandwiching situation can include where single HMO properties are located in any two of the following locations; adjacent, opposite and to the rear of a single residential properties. The SPD states sandwiching situations apply irrespective of limited breaks in building line, such as a vehicle or pedestrian access, apart from a separating road.

In this instance there appears to be an existing licensed HMO at 392 Hotwell Road, meaning that 394 Hotwell Road would be sandwiched (please see attached). It is therefore considered that the application should be refused on this basis as the proposed HMO would give rise to unacceptable neighbour amenity impacts as described in the HMO SPD.

It is also considered that compliance with other aspects of relevant policy should be assessed including the acceptability of cycle storage provision and refuse arrangements.

Any comments received from consultees can be viewed on the Council's Planning Online file at the following address: <https://pa.bristol.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SBCZY4DN00K00>

Regards,

Jonathan

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