

Development Management  
Bristol City Council  
City Hall  
PO Box 3176  
Bristol BS3 9FS

Our ref: PR002342

Date: 22<sup>nd</sup> January 2024

**Sent via e-mail**

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**59 Langton Road, Bristol BS4 4ER**

**Change of use from a dwellinghouse used by a single person or household (C3a) to a large dwellinghouse in multiple occupation (sui generis) for eight households/twelve people**

I write on behalf of my client, Dr Klare Davis, to apply for the change of use from a dwellinghouse used by a single person or household (Use Class C3a) to a large dwellinghouse in multiple occupation (sui generis). No external alterations are proposed, other than the erection of refuse, recycling and cycle stores. I attach the following documents as part of this application:

- Completed application and CIL forms;
- Drawing no. 4245.PL.01 – site location plan;
- Drawing no. 4245.PL2.02 rev. A – existing and proposed site plans;
- Drawing no. 4245.PL2.03 – existing plans;
- Drawing no. 4245.PL2.04 – existing elevations;
- Drawing no. 4245.PL2.05 – proposed plans;
- Drawing no. 4245.PL2.06 – proposed elevations;
- Drawing no. 4245.PL2.07 – existing garage;
- Drawing no. 4245.PL2.08 rev. A – proposed garden room.

## Site and planning history

The site comprises a mid-terrace dwelling house on Langton Road, in the Brislington West ward of Bristol. The house is set back around 2 metres from the pavement edge, with a small front forecourt area enclosed by a low brick boundary wall, a lawned garden to the rear, and a detached garage, accessed via a lane leading on to Bloomfield Road.

Planning permission was granted in 1989 (ref: 89/00131/H) for the erection of a first-floor extension above the single storey outrigger, though this was not implemented.

A certificate of lawfulness (ref: 23/01590/CP) for the dormer roof extensions, rear/side extensions and garage extensions was recently refused, as the proposed roof extension exceeded 40 cubic metres, however, this was due to an error on the proposed elevations, which showed the element to the outrigger roof to be 2.33m deep, whereas the floor plans (correctly) showed this to be 1.62m deep. In all other respects, the proposal was found to comply with permitted development rights (PDR). The application was resubmitted in December 2023 (ref: 23/04943/CP) and is pending consideration, though the applicant has since commenced works (as reflected by the existing and proposed plans).

A prior approval application for a larger rear extension (ref: 23/01597/HX), was submitted to the Council on the 25<sup>th</sup> April 2023, however, the Council failed to respond within the statutory 42 day period.

The area is predominantly residential, other than St Anne's Church, which lies opposite to the site to the south, and St Anne's Infant School, 50 metres to the north.

The site is not within any Article 4 area restricting permitted development rights from C3 to C4, not within any Conservation Area, there are no Tree Preservation Orders, and no other policy designations apply. The building is neither locally nor nationally listed. The site falls within Flood Zone 1.

There is a bus stop within a short distance (270 metres), on Newbridge Road, with the 36 service (a circular route) operating every 30 minutes towards Bristol City Centre. The proposed St Anne's Quietway Cycle Route (utilising existing footpaths through St Anne's Woods and Nightingale Valley, and connecting through to the Feeder Road canal path into Bristol City Centre) would be within 200 metres of the site.

There is a convenience store and pharmacy 150 metres to the south on Wick Road, and further retail facilities (convenience store, takeaway and barbers) within 300 metres on Bloomfield Road, whilst the Sandy Park Road Local Centre is within 800 metres to the southwest, and Avonmeads Shopping Park (including a Lidl, Food Warehouse and M&S Food Hall) is within 650 metres to the west.

## **Proposal**

My client proposes the change of use from a three -bedroom dwellinghouse used by a single person or household (Use Class C3a) to a large dwellinghouse in multiple occupation (sui generis) for up to 8 households/12 people. Notwithstanding the outcome of this application, the applicant intends to utilise Part 3, Class L PDR to use the (now extended) property as a C4 small house in multiple occupation for up to 6 people.

To facilitate the change of use, it is proposed to convert the garage to habitable accommodation.

Internally, 4no. single-occupancy bedrooms and 4no. dual-occupancy bedrooms. The four single bedrooms (rooms 2, 3, 6 and 7) would have a minimum floor area of 7.74sqm (and an average size of 9.12sqm), exceeding the minimum 6.51sqm requirement for a single HMO bedroom. The four double bedrooms (rooms 1, 4, 5 and 8) would have a minimum floor area of 11.68sqm (and an average size of 16.5sqm), exceeding the minimum 10.22sqm requirement for a two-person HMO bedroom. It should be noted that bedroom 3, at 10.99sqm, would exceed the minimum requirement for a double bedroom also, but for the avoidance of doubt, this is proposed as a single bedroom for both licensing and planning purposes.

The proposal includes a 32.73sqm kitchen/lounge/diner (no minimum communal floorspace licensing requirement is published for a 12-person dwelling, though the requirement generally increases by 2sqm per person, indicating a likely requirement of no more than 32sqm), and it should also be noted that one of the single bedrooms (room 3) and two of the double bedrooms (rooms 1 and 8, the garden room) exceed the minimum requirement for a combined bedroom/living room. Four en-suite bathrooms would be provided, together with two communal use bathrooms and one separate toilet, also exceeding the licensing requirements.

Refuse and recycling would be within the dedicate stores within the rear garden, and secure and covered cycle storage for 8 bicycles would also be provided within the rear garden.

## Planning analysis

### *Housing mix*

Policy BCS18 supports a neighbourhood with a mix of housing tenure, types and sizes to meet the changing needs and aspirations of its residents. The supporting text states that evidence provided in the Strategic Housing Market Assessment (SHMA) suggests that new developments should provide for more accommodation for smaller households. The SHMA was updated in February 2019 for the wider Bristol area. This states that single person households are expected to represent 40% of the overall household growth: an increase of 34,000 from 2016 to 2036. The proportion of single person households is therefore predicted to increase from 31.7% to 33.3%, whilst households with children are predicted to remain constant, at 26.2%. 'Other households' (which would include shared accommodation) are predicted to increase from 8.3% to 9.8%.

The 2019 SHMA states that, *"whilst there is projected to be an increase of 34,000 extra single person households, only 14,600 extra dwellings have one bedroom (5,000 market homes and 9,600 affordable homes). This reflects that many single person households will continue to occupy family housing in which they already live."* (para 2.20). It therefore follows that the provision of accommodation for single households (which HMO rooms provide) would potentially free up family housing, in addition to meeting an identified need. The SHMA predicts that the need for 1-bed accommodation will increase by 16.8% over the period, whilst the need for 3-bed houses will increase by a broadly similar figure (17.6%).

At the start of the 2022/23 academic year, UWE had 485 students on the accommodation waiting list, whilst 137 UWE students were residing at accommodation in Newport, with other students having to commute from Gloucester and Bath (Source: BBC News website). For 2023/24, in addition to the Newport accommodation, UWE was also offering 86 rooms at Shaftesbury Hall in Cheltenham, and 63 rooms at Upper Quay House, Gloucester, indicative of the shortage of shared accommodation in the city. In December 2022, *The Guardian*<sup>1</sup> reported a 25% under-provision of student accommodation within the Bristol area. More recent research<sup>2</sup> suggests that there will be a nationwide shortage of some 600,000 student bedspaces by 2026; the same report notes that, in Bristol, bed demand has increased by 15,058 during the period 2017-2023, while the number of beds has only increased by 3,511.

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<sup>1</sup> [UK student housing reaching 'crisis point' as bad as 1970s, charity warns | Student housing | The Guardian](#)

<sup>2</sup> [Students left in 'nightmare' accommodation as UK cities short of 620,000 beds by 2026 \(inews.co.uk\)](#)

In terms of rental property more broadly, Bristol City Council has publicly acknowledged that the city has a “rent crisis”<sup>3</sup>, with over one-third of the population (134,000 people) currently renting privately in Bristol. As the Council itself notes, *“Over the last decade, private rents in Bristol have increased by 52%, while wages have only risen by 24%. On average, Bristol residents now need almost nine times their annual salary to buy a house. The spiralling costs mean housing is becoming increasingly unaffordable, pushing many further away from their place of work, family, and support networks.”*

There is no doubt that a shortage of supply of rental accommodation in the city has had an impact on rentals costs. A recent (October 2023) report by Unipol and HEPI<sup>4</sup> shows that average rental costs in Bristol, at £9,200 per room for the 2023/24 period, are the highest outside London, and have increased by 9% from 2021/22. It is not outlandish to suggest that the Council’s adoption of Article 4 Directions, removing Part 3, Class L PD rights to create small houses in multiple accommodation, introduced to limit the spread of HMOs, has also contributed to rising rents, for both young people in employment and students. Restricting supply will naturally increase demand.

The Bristol City Council ‘JSNA Health and Wellbeing Profile 2023/24’ reported a doubling in the number of households in temporary accommodation from 2019/20 Q3 (573) to 2020/21 Q4 (1124). Whilst numbers dropped back to 868 in the first quarter of 2021/22, they have increased in every quarter since then, with the latest figures (2022/23 Q3) showing 1178 households in temporary accommodation. The report states, *“Temporary Accommodation is a key indicator of homelessness and poor housing supply. The number of households placed in temporary accommodation in Bristol has doubled since 2020 and without the availability of affordable move-on accommodation there are no signs of it returning to pre-pandemic levels.”*

The 2021 Census data reports that, in the Brislington West ward, 62.4% of dwellings were three bedroom or more, 23.6% two bedroom, and 14% one bedroom. This compares with city-wide figures of 55.4%, 28.4% and 16.2% respectively, indicating a relative imbalance on a local level between three-bed and one-bed dwellings in comparison with the city as a whole.

At the LSOA level, the imbalance is even higher, with only 12.7% of properties being one-bed, and 65.5% being three-or-more bedroom. As such, the local housing stock is not sufficiently

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<sup>3</sup> <https://www.bristol.gov.uk/council-homes/tackling-the-rent-crisis>



diverse enough to meet the projected needs of single persons solely through one-bedroom dwellings, which emphasises the requirement for HMO development to address this housing need. The proposed HMO use would therefore help to meet an identified need for accommodation for single households (both single people and couples), in an area where such accommodation is lacking, as can be seen through the rise in rental costs, and the increased levels of homelessness in the city.

*"Managing the development of houses in multiple occupation" Supplementary Planning Document*

The Council's 'Managing the development of houses in multiple occupation' Supplementary Planning Document identifies what constitutes a harmful concentration of HMOs. On a street level, this arises when a proposed dwelling is sandwiched between two HMOs. On a neighbourhood level, this arises when HMOs comprises 10% or more of the housing stock within a 100-metre radius.



*Extract from Council's Pinpoint website, licenced HMOs indicated by green and blue house symbols (red circle indicates 100m radius).*

With regards to the former, the SPD states that sandwiching can occur when, inter alia, there is a single HMO property in any two of the following locations: adjacent, opposite and to the rear of

a single residential property. As can be seen from the extract from the Council's Pinpoint website above, no sandwiching would result from the proposal.

In respect of the neighbourhood, there are 3 existing HMOs within 100 metres of the site, out of 117 dwellings in total, resulting in an existing proportion of 2.6%, which would increase to 3.4% under the current proposal, and therefore the proposal would not result in the proportion of HMOs in the neighbourhood rising above 10%.

The SPD also identifies a Good Standard of Accommodation, and proposes to adopt the current standards for licensable HMO properties. These state that a single bedroom should measure no less than 6.51sqm, and a double bedroom no less than 10.22sqm; the proposed development exceeds this requirement for all rooms. The SPD does not publish a figure for the amount of communal living space required for a 12 person HMO, but it is understood to be 32sqm, which the proposal exceeds. Furthermore, and as noted earlier in this letter, three of the bedrooms would exceed the minimum requirement for a combined bedroom and living room.

### *Design*

No external alterations are proposed, other than the erection of refuse, recycling and cycle storage, and the blocking off of the garage door (which would not constitute development).

### *Residential amenity*

Policy DM30 requires extensions to existing buildings to safeguard the amenity of the host premises and neighbouring occupiers. Policy BCS21 states that new development should safeguard the amenity of existing development and create a high-quality environment for future occupiers. Policy DM27 expects that new development will "*enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight*"; and "*enable the provision of adequate appropriate and usable private...amenity space, defensible space, parking and servicing where necessary.*"

Policy DM2 seeks to ensure that the conversion of properties to HMOs results in adequate residential amenity, does not result in harm due to excessive noise and disturbance, any impact upon street parking, the character of the dwelling or through inadequate refuse or cycle storage.

The requirement for a mandatory HMO licence will help ensure that the property is well-managed, and that the amenity of neighbours is not prejudiced. Whilst a common concern with regards to HMO conversions is an increase in noise and disturbance, these issues, should they

arise, can be dealt with through environmental protection legislation, and it would be considered unreasonable to request an HMO management plan in respect of this planning application, or to condition the provision of any such plan, when this separate legislation would apply in any case. In conclusion, the proposal would not give rise to significant harm to neighbour amenity.

With regards to residential amenity, all the bedrooms would exceed the requirements for a single or double bedroom (6.51/10.22sqm), and policy-compliant shared facilities (living room and kitchen) are proposed. The rear garden is large and private, and is considered sufficient for the proposed use.

#### *Parking, cycle and refuse/recycling storage*

The Council's Waste Guidance states that for every three bedrooms (NB – the guidance does not state that this requirement should be rounded up) a refuse bin, two dry recycling boxes (44ltr & 55ltr), kitchen waste bin (29ltr) and cardboard sack (90ltrs) is required. For an 8-bed HMO, this equates to 2no. refuse bins, 4no. dry recycling boxes, 2no. kitchen bins and 2no. cardboard sacks (786 litres in total). The front garden is too shallow to store the amount of receptacles required even for a single family dwelling, due to the bay window, without appearing cluttered, and therefore it is proposed to relocate this to the rear garden, utilising the access through to Bloomfield Road for collection day.

DM23 states that for both C4 and C3 dwellings, three bike storage spaces are required for properties with 3 or more bedrooms; no requirement is detailed for large HMOs. Notwithstanding, covered cycle storage for 8no. bicycles (one per household) is proposed within the rear garden, again, utilising the access from the rear garden through to Bloomfield Road via the rear access lane.

The scheme is proposed as a car-free development, given that the dwelling is within easy walking distance of bus stops, offering regular services into Bristol City Centre, and parking is generally available to both sides of Langton Road, Bloomfield Road and Buckingham Road (all within 150 metres walking distance of the site), and the south side of Salisbury Road (the majority of the properties to the north side have removed their front boundary walls to create off-street parking). The provision of one bike storage space per household is considered to mitigate any lack of parking, given that it will support sustainable transport methods to and from the site.

The Council has no adopted parking standard for large HMOs; DM23 states that the maximum number of spaces permitted for a C4 dwelling is 1.5 spaces (for properties with 3-6 bedrooms).



This is in line with the supporting text to DM23, which states, *“The approach to the provision of parking aims to promote sustainable transport methods, such as walking, cycling and public transport, as encouraged by Core Strategy policy BCS10”* (para 2.23.7). The policy also states (in line with the NPPF), that development should not give rise to unacceptable traffic conditions.

It is likely that the use as a large HMO would generate fewer vehicles than as a large family dwelling, and that the proposal would not give rise to unacceptable traffic conditions, given the levels of on-street parking available locally. This is borne out by census data, which shows that, at ward level whilst zero car ownership across all tenure stands at 21.5%, it is less prevalent within owned tenures (12.5%) and more prevalent within the private rented sector (32%). At the LSOA level, 33% of households in privately rented accommodation have no access to a car. Essentially, a rented property in the local area is 2.5 times more likely to have no access to a vehicle than an owner-occupied property. The provision of cycle storage in excess of policy requirements would help support the zero-parking approach.

The proximity of the school is noted and acknowledged, however, whilst this would generate parking pressures at drop-off and pick-up times in and of itself, these would be during working hours, and therefore unlikely to impact on the parking availability of an evening, when car users may be returning from work, or of a weekend.

## **Conclusion**

The HMO SPD was adopted not to prevent HMOs, but to ensure that they are not overconcentrated in particular neighbourhoods, and to direct them towards areas with lower concentrations. The current proposal would not result in any one property being sandwiched between existing HMOs, and the proportion of HMOs within 100 metres would remain far below 10%. As such, there can be no in-principle objection to the property being used as a large HMO, and the overwhelming proportion of properties in the area would continue to provide family accommodation.

The Council recognises, in its Equalities Screening for the HMO SPD, that, *“It is possible that a reduction in the supply of HMOs at a local level may have a disproportionate impact on the groups who typically occupy this type accommodation - i.e. younger people (e.g. students), migrants and those on lower incomes. Impacts may include possible increases in rent and/or increases in commuting distances for work or studying.”* Similarly, in respect of draft policy H6 (Houses in multiple occupation and other shared housing) of the new Local Plan, the Equality

Impact Assessment lists the potential adverse effects of the policy as, *“Deprivation/Age (younger people): People including younger people on lower incomes in need of more affordable accommodation, such as HMOs/shared housing, may experience supply issues in areas where imbalance exists between this form of housing and other housing types.”*

As this letter details, rents have risen across the city since the introduction of the HMO SPD, and supply has shrunk, and whilst correlation does not necessarily equal causation, it is axiomatic that prices rise as supply falls. In this context, it is all the more important for the Council to approve HMOs in areas where the 10% threshold has not yet been reached.

The proposals would, in effect, provide additional accommodation for 8 households, meeting a need identified in the latest SHMA, within an area where HMO and one-bedroom accommodation is currently at low levels. The provision of four, double bedrooms would also meet the needs of co-habiting couples, priced out of the single bedroom flat market but ineligible for social rental properties, who otherwise may find that they need to rent two rooms in a shared house, at additional costs. As such it would meet the aims of both BCS18 and DM2.

In the context of the Council not meeting the 2022 Housing Delivery Test (the fourth consecutive year that this has happened) and paragraph 11d of the NPPF currently being engaged, the proposal offers: social benefits through the provision of housing suitable for single person households, whilst providing communal living which can combat the acknowledged health impacts of loneliness; economic benefits through increased spending in the locality; and environmental benefits through the more efficient use of land to provide increased accommodation (over the provision of new-build one-bedroom accommodation), and reduced energy use (the heating of one large building requiring less energy than the heating of eight individual flats).

The proposal would provide a high standard of accommodation and represent a valuable addition to the housing stock in a sustainable location, within good sustainable transport links.

The fee of £568 has been paid via the Planning Portal. If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

**Stokes Morgan Planning Ltd**