

Section 62A
Applications Team
The Planning Inspectorate
3rd Floor
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

July 30th 2024

Reference: S62A/2024/0050

Dear member of The Planning Inspectorate,

I strongly object to planning application [24/02509/PINS](#), your reference S62A/2024/0050, to create a large HMO (sui generis), on the following grounds:

- 1. Discrepancy in plans/number of residents:** The application is supposedly for up to 8 people, but the [Proposed plans](#) (including the double occupancy [garden room](#)) show room occupancy for 9 people, not 8.
- 2. Additional discrepancy in plans:** The [Proposed Plan for the application 24/00349/CP](#) (certified 30th January 2024) shows the 2nd floor as having 1 bathroom and 2 single occupancy bedrooms. The [Existing Floor Plan for this application](#) shows the 2nd floor as having 1 bedroom, 1 "office" and 2 off-suite bathrooms. In other words, the current plan doesn't match what was permitted originally.

Comment: If you look closely at the differences between the plans submitted to BCC's Planning Team and those proposed to the Planning Inspectorate now, you will notice that the HMO owner has simply changed 'Two Persons' to 'One Person' in the three double bedrooms inside the main house and has re-named one of the bedrooms 'Office' (2nd floor) with a split, double bathroom arrangement in the 2nd floor to accommodate the supposed 'Office'. If the creation of a large HMO is granted, no changes will need to be made to the layout of the property to accommodate more people in the property – 18 to 45 year-old-people may rightly get into relationships, as the formerly marked 'Two person' rooms already contain double beds for just such occasions, bringing the total back to the original aim of accommodating not 9 (although it is supposedly 8) but in fact 12 people at the property, plus the use of the 'Office' as another bedroom, making it 13 tenants in total – without having to make any structural changes from supposedly 8 people. It is therefore not an increase of 33% (from 6 to 8

people), but an increase of likely up to 117% increase from the current small HMO licence conditions.

The licence already granted by BCC is already in full use (see Spare Rooms ref below), with weekend parties, waste not put out at the right time (leading to the pavement having bins on it for several days) and at least 3 cars already having been added to the street's already difficult parking situation due to its close proximity to the two primary schools at either end of the road.

I object to the increase in occupancy, and the granting of a large HMO licence, as it would be very difficult for BCC or the Planning Inspectorate to monitor the landlord's and tenants' adherence to the limits in the proposed plans, with a strong likelihood of many more people than permitted living at the address at 59 Langton Road in future.

3. Garden Room: Page 9 of the [Officer Report for application number 24/00271/F](#) states: "...The use of the former garage as a double room raises concerns". This application has been re-submitted with no changes in this regard, so all the reasons this was originally rejected (e.g. no cooking facilities for the garden room, overlooking No.57, "...Poor outlook and inadequate light", etc) still stand.

Comment: I would like to add to this that the garden room is meant for two people to occupy. The garage conversion does not contain any kitchen or living room facilities. The other people in the house will be able to make food in the kitchen area and if they don't feel sociable, will be able to remove themselves from the kitchen and go to their room to eat. The two people in the garden room will not only have to go through the garden to get to the kitchen or communal areas, but will have to do so come rain or shine! In addition, the back lane of the property is a shared, private lane that is in use by lots of people – but it is an unlit, not particularly well maintained access point to get to gardens and garages. I propose that it would be very likely that the people who would be living in the so called 'Garden Room' would inevitably feel that they are intruders in the main house (as they would have to let themselves into the back of the house) and that they would be very likely to set up a kitchenette of sorts and just live in the Garden Room. This would mean that they would enter and exit the property only via the garden, rather than the front of the house and that any of their visitors would also come round the back of the house – why would they use the house, if they are only in the Garden Room? They would also have to make special arrangements to put their rubbish out, as it gets collected from the front of the house. Where would they park their car(s)? Probably not round the front – and they cannot park it in back lane (not enough space) and there is only limited space on Bloomfield Road, because of the proximity and restrictions around St Anne's Infant School and After School Club provisions.

This point was summarised in line with Bristol City Council guidance in the rejection of the original large HMO application:

The proposed development would fail to provide a high-quality and adequate living environment for future occupants due to cramped living conditions, poor outlook, and inadequate light, particularly in relation to bedroom 7 in the attic and bedroom 8 in the converted garage. The proposal is therefore contrary to Policy BCS21 of the Bristol Development Framework, Core Strategy (2011), and Policies DM2 and DM30 of the Bristol Local Plan, Site Allocations and Development Management Policies (2014).

I strongly object to people being put in a situation where the likelihood is that they will feel uncomfortable and subsequently create cooking facilities and full living quarters in the Garden Room, which in addition to the points above, are also likely to create additional fire hazards, making living in a garden room dangerous for tenants and adjoining/neighbouring properties.

4. **Noise:** The first paragraph of page 4 of [the cover letter](#) states "*The second reason for refusal related to impact on neighbours due to the high number of occupants proposed. Occupancy has now been reduced from twelve to eight, and given that this would only be an increase in two from the present situation, it is not considered harmful to residential amenity.*"

Comment: Although I am not an adjoining neighbour, the noise coming from music, parties (increasing with more people moving in) can still be clearly heard by us in the front and back inside our property, keeping me awake at night. I know no 57 and 61 have already started making recordings. I am monitoring the situation and will also start recording if noise levels persist.

I object to the granting of a large HMO licence because more people will mean more noise and more difficulties for families with children – the immediate homes from Buckingham Road to Bloomfield Road (no 35 – 67 Langton Road) have at least 15 children living on the same side – not counting the under 20s still living with or frequently returning to their parents' homes or children living opposite (on the even side), which would bring the number closer to 35 children and young people.

This point was summarised in line with Bristol City Council guidance in the rejection of the original large HMO application:

The proposed development would have a harmful impact on neighbouring amenity due to the loss of privacy, noise transference, and disturbance as a result of the high number of occupants proposed. This is contrary to Policy BCS21 and BCS23 of the Bristol Local Plan, Core Strategy (2011), and Policies DM2, DM30, and DM35 of the Site Allocations and Development Management Policies (2014), as well as the requirements of the NPPF.

5. **This unwelcome change to our home has already taken a significant toll on my mental health.** We are not only under mental and emotional strain because of the 6 tenants already living there, but we live in

fear of a *suis generis* application being approved, which would pave the way for up to 12 (or more) tenants to be moved into the existing space.

As such, we **strongly** reject the applicant's assertion that an increase of 2 more residents would "*not [be] considered harmful to residential amenity*". This would in fact be an increase of 33% to the already unacceptable levels of noise and stress we are already being subjected to on a daily basis. And, as stated above, it is likely that the granting of a *suis generis* application could in fact easily lead to an increase of occupancy of 59 Langton Road of up to 117% compared to the status quo.

One more note on this subject: Despite assurances from [REDACTED] that she would have sound insulation installed along the adjoining wall, we know from the immediate neighbours to the property have experienced absolutely no evidence of this having been done whatsoever. Our neighbours spoke to the owner of the construction company about this proposed insulation, and he explained that should it be installed it would be pretty much useless anyway, due to the thickness/type of insulation they could realistically install in this type of property.

6. **Parking:** Page 5 of the [cover letter](#) states that "*...of the six current tenants, only one owns a car*". This is false; we have observed that at least 3 of the current tenants (that we know of) own and use a car, and we have already noticed an increase in difficulty trying to park outside in the street. Furthermore, if and when these tenants eventually move out and are replaced by new tenants, there is nothing stopping them all bringing a new car to the street. In fact, despite the applicant's original assurances (in their [application for a 12 person HMO](#)) that this was to be a "*car free development*" [page 8], [the property's listing on Sparerooms.co.uk](#) states that there is "*On street parking with no restrictions or permits needed*". Additionally the applicant has no ability to enforce a no-car policy and has not demonstrated any attempt to do so.

Furthermore, the cover letter incorrectly states that the church hall opposite the property is only used by local clubs, 4 nights a week. In fact, as evidenced by [the schedule on the church hall's website](#) and the attached photograph of the noticeboard outside, the church hall is in use 7 days a week, for a variety of clubs and private bookings throughout the day. We also reject the applicant's presumption that the clubs and events "*...Would most likely be attended by local children, and as such parents would generally walk rather than drive their children there.*" As residents who live diagonally opposite, we regularly observe large numbers of cars fighting for spaces and dropping children off in the road. The applicant has failed to take into account not only the many visitors from outside the immediate area, but also what happens in bad weather, when even local families will be more likely to drive to the venue. These same points can also be applied to parents during school pick-up/drop-off times.

The cover letter also states (on page 5) that they attach "*... A recent appeal decision at 15 Hollywood Road ... where the Inspector was satisfied that a*

9-bed HMO would not generate any more on-street parking than a large family dwelling, given the pattern of car ownership in the area identified within the 2021 Census." This is a misrepresentation of the Inspectors comments. They actually said (on page 18 of the same letter) that they were *"...Not convinced that the proposed development would generate four additional cars on the highway network"*, which is not the same as saying that 9 separate dwellings would generate the same number of vehicles as 1 large family. We also would like to point out that this 2021 census was conducted during the Covid pandemic, an anomaly that would likely have impacted people's answers re: their living situations and the number of vehicles at any one residence.

Additionally, the cover letter claims (on page 4) that *"Neighbours stated that the use of the church opposite the site, and the proximity of the primary school, resulted in parking stress, but provided no evidence"*. This statement is also false; [REDACTED] [REDACTED] at No.57 submitted photographic evidence, taken around school use hours, of parking stress in the street. This was submitted as evidence under application [24/00271/F](#) but since this application has been refused, the neighbours' objections seemed to have been removed from public view.

The applicant has re-submitted exactly the same [on-street car parking stress survey](#) (dated March 2024), which again claims that *"The application proposals will be car-free"*. This was rejected by TDM on 11/4/24 as the *"Parking survey does not fully assess the impact of parking at the peak parking times"*, and that *"There is insufficient evidence that the impact of unrestricted parking arising from the development proposal on the local street will not cause road safety issues"*. We feel that the original view of the TDM remains valid, particularly as the survey was originally conducted after 10pm. We feel it should be noted that any new parking survey which the applicant may submit between now and September 2024 will not be able to take into account additional parking stresses created by school/church term-time-only activities.

This point was summarised in line with Bristol City Council guidance in the rejection of the original large HMO application:

The application has failed to provide sufficient information to demonstrate that the proposed development would not result in harm to the amenities of the local area and would not exacerbate unacceptable traffic and highway safety conditions. This is due to the density of development, site context, and likely increase in demand for on-street parking in an area with limited on-street parking. The application is therefore refused due to conflict with the Council's 'Managing the Development of Houses in Multiple Occupation' Supplementary Planning Document (2020); Core Strategy (2011) Policy BCS10; Site Allocations and Development Management Policy (2014) DM23 and DM35; and the National Planning Policy Framework (2023).

7. Refuse storage: Page 5 of the [cover letter](#) states that *"Policy-compliant storage (1 set of containers for every three bedrooms, equating to two sets of containers) is now proposed to the front forecourt."* This property has had

6 tenants / bedrooms in effect for more than a month now, and they still only have one set of containers/bins, with excess refuse being left out on the street when the refuse collectors decline to take it. This assurance that they will get more bins if they get 2 or 3 more tenants lacks any evidence.

Comment: Please also consider that the tenant who lives in the front room on the ground floor, adjacent to the front door cannot look out of their window, as the glass in the window up to above head height has been frosted (permanently, not film). This means that the person cannot see into the street – and nobody can look into their room – however, they also have two huge racks with bins right in front of their window (currently without the sufficient and stated number of bins supposedly provided to tenants). – If recent experience is an indication of the future and a large HMO licence is granted, this tenant, and maybe the one immediately above, are likely to have to put up with the waste and smells of what I suspect is more likely to be 12 (or even 13) people than 8 (see above). HMO tenants at the address have already shown that they are less likely to recycle and more likely to forget to put bins out (or in) and the people in the front rooms, and the neighbours either side, are likely to experience the smells and sight of waste significantly more than they would with just 6 adults in the house – the small HMO licence granted number of people permitted.

This point was summarised in line with Bristol City Council guidance in the rejection of the original large HMO application:

The proposed development fails to make adequate and practical provision for the movement and storage of bins from the highway to the storage location within the curtilage. This is contrary to Policy DM2, Policy DM23, and Policy DM32 of the Bristol Local Plan, Site Allocations and Development Management Policies (2014), as well as the Council's 'Designing for Cycling' guidance, Cycle Infrastructure Design (LTN1/20), and Waste Management guidance.

I appreciate your consideration of the above points and would urge you to refuse this and any further applications seeking to increase the number of dwellings or residents at No.59 Langton Road.

Yours sincerely,

Iris Partridge