

Section 62A Applications Team  
The Planning Inspectorate  
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Bristol  
BS1 6PN

Our ref: PR02578

Date: 4<sup>th</sup> November 2024

**Sent via e-mail**

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**23 Hillsborough Road, Bristol BS4 3QW**

**Provision of an additional bedroom within an existing 7-bed House in Multiple Occupation, to create an 8-bed HMO**

I write on behalf of my client, Habibo Homes Ltd, to apply for the provision of an eighth bedroom within an existing large dwellinghouse in multiple occupation (*sui generis*). No external alterations are proposed. The applicant has chosen to take the Section 62A route and submit the proposal directly to the Planning Inspectorate. Notice of this intention was given on the 21<sup>st</sup> October 2024. I can confirm that the development would not be liable for CIL. I attach the following documents as part of this application:

- Application forms and certificates;
- Drawing no. 23/HR/B/00/P – site location plan;
- Drawing no. 23/HR/B/101/P – existing front elevation;
- Drawing no. 23/HR/B/102/P – proposed front elevation (no changes);
- Drawing no. 23/HR/B/103/P – existing and proposed side elevation (no changes);
- Drawing no. 23/HR/B/104/P – existing side elevation;
- Drawing no. 23/HR/B/105/P – proposed side elevation (no changes);

- Drawing no. 23/HR/B/106/P – existing rear elevation;
- Drawing no. 23/HR/B/107/P – proposed rear elevation (no changes);
- Drawing no. 23/HR/B/108/P – proposed ground floor plan;
- Drawing no. 23/HR/B/109/P – existing ground floor plan;
- Drawing no. 23/HR/B/111/P – existing and proposed first floor plan (no changes);
- Drawing no. 23/HR/B/14/P – existing and proposed site plan (no changes);
- Drawing no. 23/HR/B/14/P – refuse/recycling store details (no changes);
- Drawing no. 23/HR/B/15/P – garage/bike store details.

### **Site and planning history**

The site comprises a 7-bed, large dwellinghouse in multiple occupation, approved in 2020 (ref: 20/02380/F). The house has also been extended to the rear (two-storey). The applicant obtained a certificate of lawfulness from the LPA for this extension in 2019 (ref: 19/06117/CE).

### **Proposal**

My client proposes to convert a communal dining room to the ground floor rear extension to an eight bedroom. No other alterations are proposed. The approved 7-bed scheme included refuse and recycling storage, and cycle storage within the garage. The LPA has since updated its guidance on cycle storage, and to address this, it is proposed to provide 4no. Sheffield Stands within the garage.

The additional bedroom is proposed as a single-occupancy bedroom, and would measure 8.6sqm, exceeding the minimum 6.51sqm requirement for a single HMO bedroom.

The existing HMO includes a 24.4sqm kitchen/lounge/diner, which exceeds the 24sqm Licensing requirement for an 8-bed HMO. Five of the rooms currently have en-suite bathrooms, and there is also a separate shared toilet and a shared shower room, also exceeding the licensing requirements.

Refuse and recycling would continue to be provided within the dedicate store within the rear garden, and secure and covered cycle storage for 8 bicycles would be provided within the existing garage.

## 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%).

Further to the 2019 SHMA, the LPA has recently published the 'City of Bristol Local Housing Needs Assessment Report of Findings' (November 2023), as a background paper to the new Local Plan. This predicts that, for the period 2020-2040, single person households will represent almost a third of the overall household growth (15,000, 32%), couples without dependent children will represent almost a further third of the growth (13,600, 29%), whilst families with dependent children will make up approximately one fifth of the overall household growth (9,000, 19%). Pertinent to the application, the need for HMO and student households (9,400, 20%) exceeds that for families with children.

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.

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 Permitted Development, 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.”

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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 \[REDACTED\]](#)

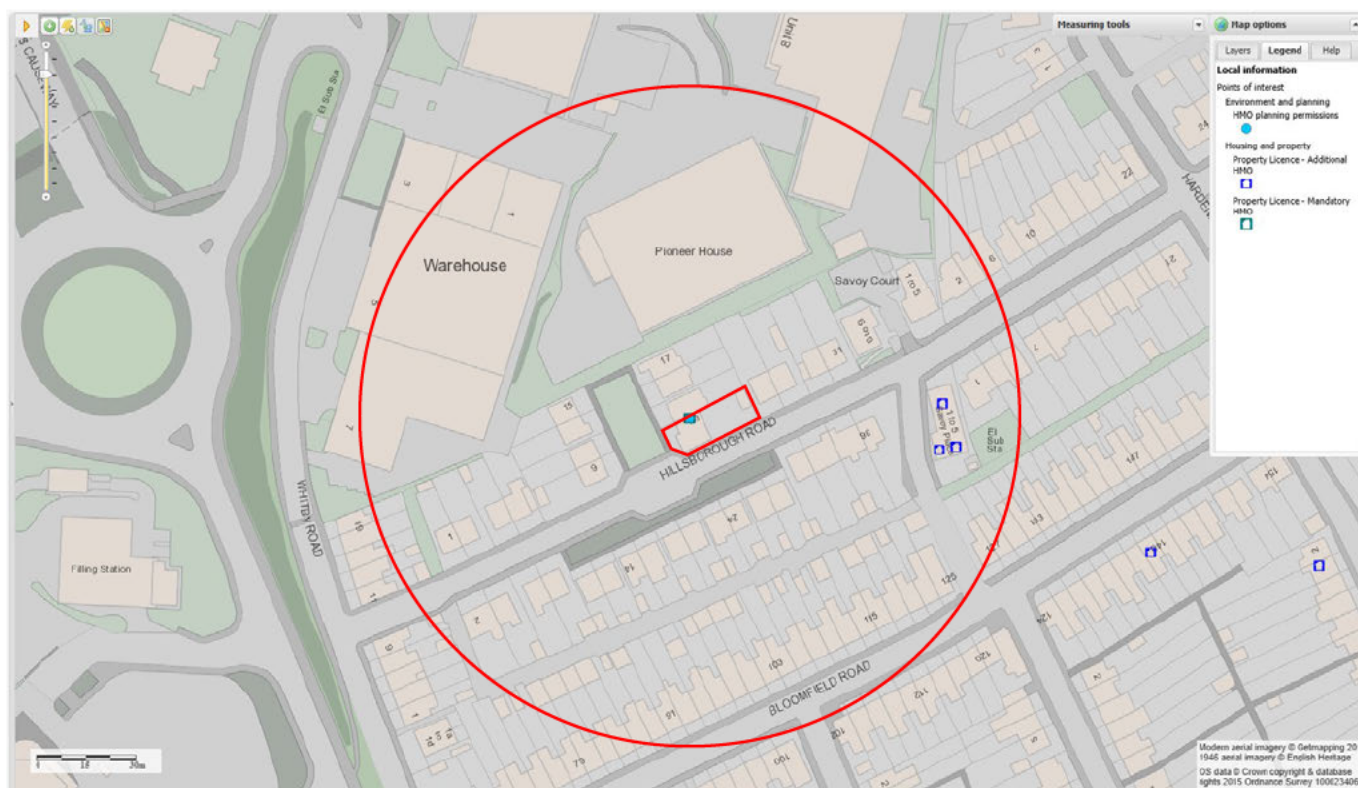
<sup>3</sup> <https://www.bristol.gov.uk/council-homes/tackling-the-rent-crisis>

<sup>4</sup> [REDACTED]

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.

As such, the local housing stock is not sufficiently 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 additional room would therefore help to meet an identified need for accommodation for single households, 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*



*Extract from Council's Pinpoint website (red circle indicates 100m radius).*

The Council's 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) 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.

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. However, it also goes on to say that sandwiching cannot occur across a separating road. As can be seen from the extract from the Council's Pinpoint website above, there are no existing HMOs within the vicinity, and therefore no sandwiching would result.

In respect of the neighbourhood, the Council does not provide a tool for calculating the number of HMOs within 100 metres of a site, and therefore applicants/appellants are required to manually calculate this figure. In this case, the figures have been arrived at by drawing a 100-metre radius on the above map, and then checking Council Tax records for the number of dwellings within that area (including flat conversions, which count as separate dwellings).

Including the application site, there are only 5 existing HMOs within 100 metres of the site (there are 4 registered HMOs at Savoy Place), out of 82 dwellings in total, resulting in an existing proportion of 6.1%. As the proposal is to increase the occupancy of an existing HMO, the proposal would not increase this figure.

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; the proposed development exceeds this requirement for all rooms. The standards also require 24sqm of communal living space for an 8-person HMO, which the proposal exceeds.

### *Design*

Policy BCS21 states that new development should contribute positively to an area's character and identity, whilst policy DM30 states that extensions will be expected to respect the siting, scale, form, proportions, materials, details and the overall design of the host building and broader streetscene. In a similar vein, policy DM26 requires development to respect the local pattern and characteristics, and to respond to the height, scale, massing, shape, form and proportions of existing buildings. Finally, policy DM27 requires development to respect the layout and form of existing development.

No external alterations are proposed.

### *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 bedroom, and policy-compliant shared facilities (combined 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. As the proposal seeks to add an additional bedroom to an existing 7-bed HMO, there would be no increase in bin storage requirements, and the existing refuse storage would continue to suffice.

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, secure cycle storage for 8no. bicycles (than one per bedroom) is proposed within the existing

garage (as per the existing arrangement), with 4no. Sheffield Stands to be installed, a minimum 1 metre apart, and a minimum 600mm from any wall.

The 7-bed scheme was approved with two parking spaces, on the basis that the site was sustainably located, and that there was a good level of on-street parking available locally. No additional off-street parking is proposed, and 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.

Compared to the current 7 residents at the property, it is likely the proposed 8 person HMO would generate only a modest additional demand for on-street parking. Residents of the HMO would not be highly reliant on private car travel given the urban location, and the opportunities to walk from the property to local services and facilities. including larger shops at Avon Meads Shopping Park, a Sainsbury Superstore at the end of the road, and smaller shops and bus stops on Sandy Park Road. The HMO would be located where sustainable travel patterns can be achieved, in line with Core Strategy policy BCS10.

## **Other issues**

### *Biodiversity net gain*

The Environment Act 2021 introduces the mandatory "biodiversity net gain" (BNG) requirement for new housing and commercial development in England, subject to any exemptions that may apply. The exemptions that apply to the BNG requirements are habitats below a 'de minimis' threshold of 25 metres squared; or five metres for linear habitats like hedgerows.

As the proposal is for a change of use only, the development would be exempt from BNG requirements.

### *Coal mining risk*



The site falls within the coal mining high risk development area. However, as the works are internal only, no CMRA has been provided.

## **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 continue to remain below 10%. As such, there can be no in-principle objection to the occupancy rate of the property being increased by a single bedroom.

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 provide additional accommodation for a single person within an existing HMO, meeting a need identified in the latest SHMA and the Local Housing Needs Assessment, within an area where HMO and one-bedroom accommodation is currently at low levels. 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 £293 will be paid directly to the Planning Inspectorate (based on the application not being a material change of use, and the LPA considering that HMOs do not constitute residential development, and therefore the rate for building works of less than 40sqm applying). If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

**Stokes Morgan Planning Ltd**