

FEBRUARY 2025

# HERITAGE AND PLANNING SUPPORTING STATEMENT

17 CLARENDON ROAD, BRISTOL BS6 7EX

ON BEHALF OF: **MR VISHAL SHAUNAK**

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## 1. INTRODUCTION

1.1 This Heritage and Planning Statement has been prepared by Stokes Morgan Planning Ltd on behalf of Mr Vishal Shaunak. It supports a full planning application for the sub-division of a single 13-bed large dwellinghouse in multiple occupation, to form 1no. small HMO, 1no. large (7-person) HMO, and 1no. self-contained flat. It is also proposed to erect a single-storey rear extension.

1.2 The description of development is as follows:

*"Sub-division of existing 13-bed large HMO to create 1no. small HMO at lower ground floor level (including a single-storey rear extension), 1no. self-contained flat at ground floor level, and 1no. large, 7-bed HMO at first and second floor levels."*

1.3 The purpose of this Statement is to explain the background to the scheme and provide an assessment of the key planning issues set against the context of national and local planning policy and guidance, and any relevant material considerations.

1.4 This document is structured as follows:

- Application Site and Surroundings;
- Authorised Use and Planning History;
- The Proposed Development;
- Planning Policy Analysis; and
- Conclusions.

## 2. APPLICATION SITE AND SURROUNDINGS

### **Site and location**

2.1 The application site is an end-terraced, late-Victorian four-storey dwellinghouse to the south side of Clarendon Road.

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- 2.2 As typically seen of many late-Victorian properties in the area, the dwelling is faced with pennant stone with ashlar stone window dressings and quoins. A three-storey bay extends up to eaves height, with a hipped pentagonal roof. Original sash timber windows remain in situ, however modern additions such as roof lights and a front dormer window are visible from the public realm. The rear elevation is four storey and flat in appearance, with a gable front, and pairs of windows at each level.
- 2.3 The boundary treatment comprises a pennant stone wall with a stepped access up to the front door, and steps down to the basement.
- 2.4 A Certificate of Lawfulness was recently issued (ref: 22/05293/CE) for the existing use as a 13-bed, large dwellinghouse in multiple occupation. The original layout has largely been retained, with stud partition walls erected within the bays at ground and first floor level to create additional bedrooms. The dwellinghouse has a kitchen and utility room at basement floor level, a ground floor living room, and two bedrooms at basement level, three at ground floor level, and four each at first and second floor levels.
- 2.5 More recently, planning permission was granted for a single storey rear extension (ref: 24/04069/H), to create a laundry room for the existing HMO. The single storey extension proposed as part of this current application is identical to that previously approved.
- 2.6 The site is in the Redland ward of Bristol, and is in the Cotham and Redland Conservation Area, and it is defined as being within the Environment Agency's Flood Risk Zone 1. No Tree Preservation Orders apply to the site. An Article 4 Direction applies to the area, which removes development rights permitted under both Class F of Part 1 (provision of a hard surface within the curtilage of a dwellinghouse) and Class B of Part 31 (demolition of front boundary treatment) of Schedule 2 of the General Permitted Development Order. There are no Listed or Locally Listed Buildings within the vicinity.

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**Local context**

- 2.7 The houses in Clarendon Road by-and-large have retained their original period features, including sash timber windows. Remodelling is largely to the rear of the properties, with aerial photography showing a number of rear extensions and roof alterations, including solar panels – see image, below.



*Figure 1 – rear of Clarendon Road, image courtesy of Google Maps*

### **3. LAWFUL USE & PLANNING HISTORY**

- 3.1 As noted above, the property has a lawful use as a large (13-bed) dwellinghouse in multiple occupation.
- 3.2 Previously, planning permission has been granted for sub-division into 4 flats, but this was not implemented.
- 3.3 Consent ref. 24/04069/H for a single storey extension to the HMO was granted on 7<sup>th</sup> January 2025.

### **4. THE PROPOSED DEVELOPMENT**

- 4.1 The proposed description of development is as follows:

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*“Sub-division of existing 13-bed large HMO to create 1no. small HMO at lower ground floor level (including a single-storey rear extension), 1no. self-contained flat at ground floor level, and 1no. large, 7-bed HMO at first and second floor levels.”*

- 4.2 The existing 13-bed HMO (each room is in single occupancy), would be sub-divided to create two flats at lower ground and ground floor level, and a maisonette at first and second floor levels. The lower ground floor would comprise a 3 bed/person small HMO (C4 use class), the ground floor, a two-bed flat (C3 use class), and the upper floors, a 7 bed/person large HMO (Sui Generis).
- 4.3 The only external alteration proposed is the erection of a rear extension. This would be the same dimensions as the extension recently approved under planning permission 24/04069/H), and would be approximately a third of the width of the house, 5.25 metres deep, with a dual-pitched clay-tiled roof, and would be finished in pennant stone to match the existing rear elevation. Timber doors and windows are proposed. The extension would provide a third bedroom for the lower ground floor HMO.
- 4.4 As an existing 13-bed HMO, the property is let out on a room-by-room basis. The applicant therefore seeks to provide two smaller HMOs which would be more suited to groups of friends, and likely be less transient in nature as a result. Overall, the number of bedrooms within the property would be reduced by one, to twelve.

## **5. HERITAGE AND PLANNING ANALYSIS**

- 5.1 Following on from an analysis of the setting and significance, the key policy tests and material considerations to be assessed in the determination of this proposal, are:
- Would the housing mix proposed be acceptable?
  - Would the proposal preserve or enhance the character and appearance of the Conservation Area?

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- Would the development be out of scale or incompatible with the surrounding area?
- Would the development provide suitable amenity for future occupants?
- Would the development harm the residential amenity of neighbours?
- Would the development address highways impacts?
- Are there any other issues that would warrant refusal?

5.2 These considerations are addressed separately below.

**Heritage analysis**

5.3 The application site is within the West Redland character area of the Redland and Cotham Conservation Area. The Character Appraisal notes the following predominant characteristics:

Predominant Characteristics	Architectural Treatment
<p><b>Scale &amp; Proportions</b></p> <ul style="list-style-type: none"> <li>• Residential scale, most houses semi-detached pairs, occasional terraces (Woolcott Street) and detached villas (Clyde Park)</li> <li>• 3 and 5 bay projecting bay windows either single or two storey</li> <li>• Mostly 3-storey with some room in the roof level, with dormer windows</li> <li>• A number of roads have stepped runs of houses up and down the hills, where others run along the line of the slope and overlook the adjacent roads</li> <li>• Pitched and gabled roofs, or 'M' roofs concealed behind parapets</li> </ul>	<ul style="list-style-type: none"> <li>• Gable ends with decorative bargeboards</li> <li>• Dormer windows with glazed or metal clad cheeks, some round-headed and some pointed</li> </ul> <p><b>Material Palette</b></p> <ul style="list-style-type: none"> <li>• Main facades: stucco or limestone ashlar faced in earlier buildings with limestone details; Pennant rubble with limestone dressings in later buildings</li> <li>• Boundary treatments: Sandstone rubble with limestone gate piers</li> <li>• Joinery: Timber sashes and panelled doors</li> <li>• Roof coverings: Clay double Roman tiles; natural slate</li> </ul>

5.4 In terms of the predominant characteristics, 17 Clarendon Road is a typical example of West Redland house. Whilst dwellings within West Redland as a whole are recognised as character buildings, 17 Clarendon Road in itself is not considered architecturally significant.

5.5 The elements of the Character Appraisal SWOT analysis, below, are of relevance to the application:

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- Strengths – overall strength of character by consistent material palette; interest of individual architectural treatments and decorative detailing;
- Weaknesses - Inappropriate roof-level alterations; use of unsympathetic materials: uPVC in replacement windows, doors, soffits; and painting of stone facades and detailing; and

*Heritage Impact*

5.6 The rear extension would use matching materials and would not be visible from the public realm. It would not impact on the conservation area.

*Heritage analysis - conclusion*

5.7 The proposed development would not have a harmful affect the historical or architectural significance of the buildings or the conservation area.

**Planning analysis**

**Housing mix**

5.8 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.

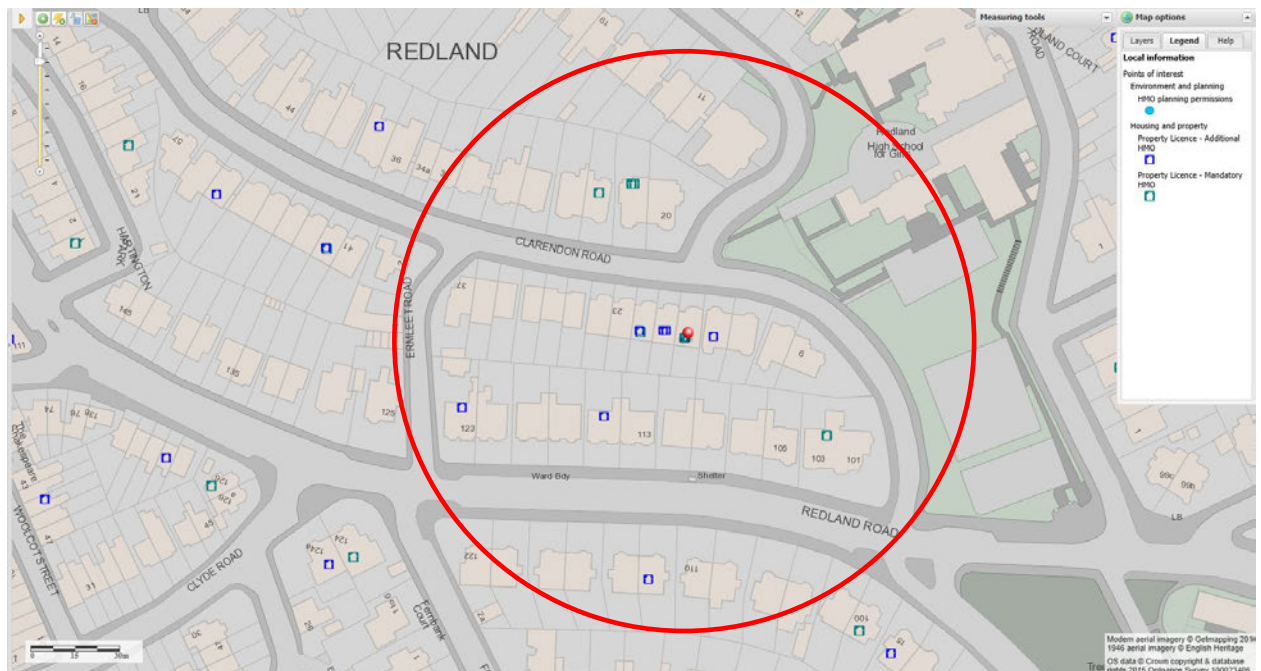
5.9 The SHMA was updated in February 2019 for the wider Bristol area. Further to this, the LPA published the 'City of Bristol Local Housing Needs Assessment Report of Findings' in November 2023, as a background paper to the new Local Plan.

5.10 Both the SHMA and the LHNAR identify that the biggest growth in housing need is for single person households (expected to represent, for the period 2020-2040, almost a third of the overall household growth (15,000, 32%), with couples without dependent children representing 29% of the growth (13,600), HMO and student households 20% (9,400), and families with dependent children 19%(9,000). the need for HMO and student households (9,400, 20%) exceeds that for families with children).

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

5.11 The LPA's 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) identifies what can constitute a harmful concentration of HMOs. On a street level, this can start to arise when a proposed dwelling is sandwiched between two HMOs. On a neighbourhood level, this can arise once HMOs comprise 10% or more of the housing stock within a 100-metre radius. The SPD also states that the intensification of existing HMOs can also lead to harmful situations.



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

5.12 The application site is one of four consecutive HMOs, with both 19 and 21 Clarendon Road comprising separate basement and upper floor HMOs. Currently, the site does not contribute towards a sandwiching situation.

5.13 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. There are currently 21 HMOs within 100 metres, and clearly there are not 210 dwellings (even



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accounting for flat conversions), and so the proportion of HMOs already exceeds 10%.

5.14 Whilst the proposal would increase the number of HMOs in the area, the number of HMO bedrooms would be reduced from 13 to 10, and in these circumstances, the proposal is not considered to result in greater levels of harm. Of relevance is a recently allowed appeal at Nailsea Electrical, 102 Gloucester Road, Bristol (APP/Z0116/W/23/3335671), a copy of which accompanies the application. 9 HMOs were proposed following the redevelopment of an existing retail unit (with extant consent for a flattened scheme of 17 dwellings), which would have raised the proportion of HMOs from 5.1% to 13%.

5.15 The Inspector in effect stated that the 10% threshold is a starting point, and it is still necessary to identify harms arising from the development, not simply to refuse because the 10% threshold has been exceeded. They concluded on this issue that, *“the threshold would only be exceeded by 3%. In the context of this particular site, which is located on a corner plot, by a busy road in an area of a significant mix of uses, 3% above the nominal percentage threshold outlined in the SPD would be minor. In addition, having regard to the findings above, the development would not result in any of the harms, set out in the relevant Policy, in terms of noise and disturbance to residents, impact on on-street parking, and the effect of physical alterations to the building.*

*Compared to the two previous schemes at the site, there would be a different mix of housing. The Council notes that the previous proposal for 17 flats was acceptable as it would increase the availability of smaller properties in an area where houses, with a greater number of bedrooms was predominant. This proposal would introduce a number of HMOs rather than small flats. However, it would still introduce more housing choice for those seeking smaller types of accommodation. Therefore, both the 17 flats scheme and this appeal scheme would increase choice, and I have no evidence that one would be significantly more beneficial than the other.*

*Taking these matters together I conclude that the concentration of HMOs in the area would not result in harm that would breach the Policy objectives. In this regard*

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*I therefore conclude that the development would accord with Policy DM2 of the SA&DMP.” (para 36-38)*

- 5.16 Given that the whilst the proposal would result in an increase in HMO units of 1, it would also result in a deintensification in terms of net HMO bedrooms, the proposal is not considered to result in increased harms to neighbouring properties or the surrounding area.
- 5.17 With regards to the creation of a two-bed C3 dwelling at ground floor level, the proposal would meet the identified need for accommodation suitable for couples with and without dependent children. It is noted that the HMO SPD states that a sandwiching situation can occur within buildings, and that the new C3 unit would be sandwiched between HMOs above and below, and also to either side. However, given that one of the purposes of the HMO SPD is to ensure that housing choice is not reduced through a shift from permanent family housing to more transient accommodation, it would seem perverse to refuse consent for a new C3 dwelling in an area with a high number of HMOs.
- 5.18 For these reasons, the proposed sub-division is considered acceptable in terms of both principle, and housing mix.

**Would the proposal preserve or enhance the appearance of the Conservation Area?**

- 5.19 Policy BCS22 requires proposals to safeguard or enhance heritage assets and the character and setting of Conservation Areas. Policy DM31 details how the council will secure the conservation of heritage assets.
- 5.20 Policy BCS21 requires development to contribute to an area's character and identity, creating or reinforcing local distinctiveness.
- 5.21 Policy DM26 requires design to respond appropriately to the existing built environment, particularly in respect to predominant materials and architectural styles. DM27 requires quality landscape design which responds to the contextual

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character, whilst policy DM30 requires development to respect the setting of the host building and the general streetscene.

5.22 The heritage analysis above has concluded that there would be no harm to the conservation area, and that the works would preserve and enhance the character and setting. Furthermore, the exact same extension has planning permission already, as noted earlier in this statement. The scheme is therefore policy compliant.

**Would the development be out of scale or incompatible with the surrounding area?**

5.23 Policy BCS21 states that new development should contribute positively to an area's character and identity, whilst policy DM30 states that alterations to existing buildings will be expected to be physically and visually subservient to the host building, including its roof form, and not dominate it by virtue of sizing or scale. Furthermore, it is required to respect the siting, scale, form, proportions, materials, details and the overall design of the host building and broader streetscene, safeguard the amenity of the host premises and neighbouring occupiers, and leave sufficient usable external private amenity space. 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, and, amongst other things, enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight.

5.24 Supplementary Planning Document 2 recommends that single-storey rear extensions should be designed to a maximum depth of 3.5 metres, however, any application should be assessed on its merits.

5.25 As previously stated, the exact same extension has already been approved on site, and the permission remains extant.

5.26 In conclusion, the proposals are compliant with the relevant design policies.

**Would the development provide suitable amenity for future occupants?**

- 5.27 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."*
- 5.28 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.
- 5.29 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.
- 5.30 With regards to residential amenity, as a licenced 13-bed HMO, all rooms currently meet or exceed the required standards. The lower ground floor HMO would have 3 en-suite bedrooms, all exceeding 9sqm (the smallest being bedroom 3, at 9.94sqm excluding the en-suite facilities), the minimum size for a combined bedroom and lounge.
- 5.31 At the Nailsea Electrical appeal, the Inspector noted that it was not clear from the HMO SPD how much discount should be given to the overall living space if private

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bedrooms exceed the guidance for combined bedrooms and living rooms, but concluded that it was logical that some effect on the overall communal space should be considered (para 17). Notwithstanding, a 36sqm lounge/kitchen/diner is proposed, easily exceeding the minimum 13.5sqm required for a 3-bed HMO. For the avoidance of doubt, whilst double beds are shown for illustrative purposes, the rooms would be single occupancy. The lower ground floor HMO would also retain access to the rear garden.

- 5.32 The ground floor flat is proposed as a two-bed, three-person unit, with one double and one single bedroom (12.5sqm and 11.4sqm), and 63sqm of internal floorspace, exceeding the minimum 61sqm NDSS requirement for a 2b3p flat.
- 5.33 Finally, the upper floors maisonette HMO would have 7 en-suite bedrooms, all exceeding 9sqm (the smallest being bedroom 3, at 9sqm excluding the en-suite facilities), again the minimum size for a combined bedroom and lounge. In addition, a 36sqm lounge/kitchen/diner is proposed, easily exceeding the minimum 22sqm required for a 7-bed HMO. Once again and for the avoidance of doubt, whilst double beds are shown for illustrative purposes, the rooms would be single occupancy.
- 5.34 All three units would be dual-aspect, with large bay windows to the communal/living space, and large, airy rooms with high ceilings, and would provide a high standard of living. Currently, all 13 bedrooms have access to the amenity space, whilst under the current proposal, only the ground floor, 3-bed HMO would have access. However, the site is within easy walking distance of designated important open spaces, including Redland Grove (150 metres to the southeast), and Redland Green (250 metres to the northwest), and as the Inspector noted at the Nailsea Electrical appeal, it is not uncommon for flatted development and shared accommodation in urban areas to be reliant on parks for outdoor recreation space (para 22). Overall, future occupants would have convenient access to outdoor amenity space, and suitable levels of residential amenity would be afforded.

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**Would the development harm the residential amenity of neighbours?**

- 5.35 Policy BCS21 requires that development safeguards the amenity of existing development, with consideration given to matters of privacy amongst other issues. Policy DM30 states that alterations to existing buildings will be expected to safeguard the amenity of neighbouring occupiers.
- 5.36 The LPA has previously accepted that the proposed extension would not harm the amenity of 19 Clarendon Road.
- 5.37 In respect of amenity issues arising from the HMO, as noted earlier in this statement, the number of HMO bedrooms would be reduced from 13 to 10, and it is not considered that the proposed internal alterations would result in any increased impacts.

**Would the development address highways impacts?**

- 5.38 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.
- 5.39 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.
- 5.40 Presently, the site provides accommodation for 13 people, with no on-site car or cycle parking. The proposed use would also see 13 people occupy the building (a 3-bed HMO, a 7 bed HMO, and a 2 bed, 3 person flat), and so there would be no net increase in parking demand.
- 5.41 Notwithstanding, the site is in an area with a Resident's Parking Zone in operation, Redland station is within 400 metres walking distance, there are bus stops within 200 metres walking distance on Redland Road (with the 71 service operating hourly between Bristol City Centre and Bristol Parkway station), and there are further bus stops outside the train station (served by both the 71, and the 72, which also

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operates hourly between the City Centre and the UWE Frenchay campus). The Gloucester Road designated town centre lies 680 metres to the east, where additional bus services are available. As such, the site falls within a highly sustainable location.

- 5.42 It is proposed to provide cycle parking for six bikes, in the form of a Sheffield stand in the front garden for visitors, and a vertical storage rack in the ground floor hallway, for five bikes. It is acknowledged that this would be a shortfall in the required number of bike spaces (which would be 8, assuming that the requirement for a 7-bed HMO would be the same as for a 6-bed HMO) and also that the Council's (unadopted) transport design guidance does not support vertical cycle storage.
- 5.43 Due to the layout of the building, there are limited options for cycle parking provision. The rear garden can only be accessed via steps and through the building, whilst cycle parking in the lower ground floor forecourt area would obstruct the window of the proposed ground floor HMO. Given this context, the hallway vertical parking is the only practical solution, and is an improvement on the current situation of no formal cycle parking.
- 5.44 With regards to refuse and recycling storage, a dedicated store would be provided within the forecourt area to the front of the property, which could accommodate all of the receptacles currently allocated to the 13-bed HMO.
- 5.45 In summary, the proposal would not result in any increased highways impacts.

**Are there any other issues that would warrant refusal?**

- 5.46 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.

- 5.47 The proposed extension would have a footprint of 15.25sqm, and in any case would replace an existing patio area (nil habitat value). The proposal would therefore be exempt from mandatory BNG.
- 5.48 The application is supported by an energy statement, which confirms that ASHPs will be installed to all three flats, achieving a 51% reduction in carbon emissions, and exceeding the 20% policy requirement under BCS14. As such, the scheme is not required to also provide photovoltaic panels.

## **6. PLANNING BALANCE AND CONCLUSION**

- 6.1 The Council does not currently have a 5YHLS, it has not passed any of the previous four Housing Delivery Tests, and the local plan is out-of-date. As a result, §11d of the NPPF is currently engaged.
- 6.2 This planning application has been prepared with full regard to the development plan, the NPPF and other material considerations.
- 6.3 It has already been confirmed (through the extant permission for the rear extension), that the proposed external alterations would preserve the appearance and setting of the conservation area and would not result in any harm to an asset of architectural significance. Similarly, works constitute high quality design and would not result in harm to the amenity of neighbouring properties.
- 6.4 The proposal would increase the mix of housing in the area, and would secure on-site cycle parking, and the provision of air source heat pumps to the three units.
- 6.5 Weighed against these benefits would be the under-provision of cycle parking, in a form not supported by the LPA's unadopted guidance, and an additional HMO in an area where there are already high number of HMOs.
- 6.6 However, as this statement details, given that presently there is no cycle parking on site, and that the number of occupants of the building would not increase, it is not considered that the harms identified above would significantly or demonstrably outweigh the benefits of development.



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6.7 For these reasons, it is hoped that the proposal can therefore be supported.