

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

T: [REDACTED]
E: [REDACTED]

Our ref: PR01881

Your ref:

Date: 23rd April 2025

Sent via e-mail only

Dear Sir/Madam,

Town and Country Planning Act 1990

87A Redland Road, Redland, Bristol. BS6 6RD

Change of use of existing maisonettes into single House in Multiple Occupation (HMO) containing 10no. bedrooms (sui generis), with associated bin and bike storage.

We write on behalf of our client, GHJ Properties Ltd, to apply for a change of use of the above property, from 2no. self-contained maisonettes (Use Class C3) to a single large house in multiple occupation (HMO, sui generis), containing 10no. single-occupancy bedrooms. The only external alterations to the building involve the removal of the external stairs and infilling of the first-floor side doorway. 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 7th April 2025.

We can confirm that the development would not generate any CIL liability. This letter forms a proportionate Heritage and Planning Statement. As well as this letter, we submitted the following plans and documents as part of this application: -

- Completed Application Form and Ownership Certificates;
- CIL Form 1;
- Drawing no. PL01 – Site Location Plan;
- Drawing no. PL02 – Existing Site Plan;

- Drawing no. PL03 – Existing Lower Ground and Ground Floor Plans;
- Drawing no. PL04 – Existing First and Second Floor Plans;
- Drawing no. PL05 – Existing Elevations;
- Drawing no. PL06 – Proposed Site Plan;
- Drawing no. PL07 – Proposed Lower Ground and Ground Floor Plans;
- Drawing no. PL08 – Proposed First and Second Floor Plans;
- Drawing no. PL09 – Proposed Elevations;
- Drawing no. PL11 – Existing and Proposed Streetscene Elevations;
- Drawing no. PL12 – Proposed Second Floor Sections;
- Drawing no. PL13 – Proposed Cycle Store;
- Recycling Box Storage Unit “Bellus 4” Details; and
- BNG Exemption Statement.

Site and planning history

The site forms one of a pair of semi-detached properties, arranged as two maisonettes. The lower ground floor and ground floor maisonette currently provides 6no. rooms (ranging in size from approximately 11.5sq.m to 24sq.m), a separate kitchen, a rear conservatory, and two bathrooms. The first and second floor maisonette, accessed via the external staircase, includes 5no. rooms (ranging from approx. 11.5sq.m to 23sq.m), a separate kitchen, and two large bathrooms. The site benefits from a private rear garden and a front yard.

The site is in Flood Zone 1, the lowest risk of flooding, within an Article 4 area controlling the creation of new small-HMOs (C4), and within the Cotham and Redland Conservation Area. No other relevant policy designations apply to the site.

The site lies on the north side of Redland Road one of the main routes through Redland from the Downs to Gloucester Road. As such, there are bus stops, in both directions, within 200m of the site, serving multiple routes between Temple Meads/Bristol City Centre and the north of Bristol (Frenchay and Aztec West). Furthermore, Redland train station is 100m away and provides a frequent local service.



Above: Aerial image, courtesy of Google Maps, showing the site, indicated by the red pin

There is a local shop on Zetland Road (280m to the east), which also marks the edge of the Gloucester Road Town Centre designation, which provides a wide range of services and facilities. Cotham Gardens (park) open space and children's playground is 200m southwest of the site along South Road. The site is within a highly accessible urban location.

This application seeks to overcome the concerns of an Inspector following a dismissed appeal in March 2025 (ref. APP/Z0116/W/24/3341445). The appeal proposal was for the conversion of the property from two maisonettes, into 2no. HMOs, 1no. six-bedroom and 1no. seven-bedroom. The Council originally refused the application (ref. 22/01845/F) on 4no. grounds – (i) mixed and balanced communities/concentration of HMOs, (ii) cycle parking provision, (iii) car parking provision/highway safety, and (iv) living conditions for future occupants. The Inspector upheld reasons (i), (ii), and (iv), but found there to be no prospect of impact on highway safety arising from car parking demand. The Inspector's decision is appended to this letter, along with the refused floor plans and site layout.

Proposal

The application is a response to the Inspector's decision and seeks to overcome the outstanding concerns with regards to HMO concentrations (resulting in harm to residential amenity), cycle parking provision, and living conditions.

It is now proposed to amalgamate the two self-contained maisonettes into a single HMO containing 10no. bedrooms (sui generis). For the avoidance of doubt, as the Inspector previously assumed (paragraph 10 of their decision) that there could be more occupants than bedrooms; the bedrooms are proposed as single occupancy.

The HMO would be accessed from the existing ground floor main entrance to the side of the property, with the internal staircase now accessing all floors. The redundant external staircase would be removed, and the first-floor entrance filled in and the wall made good to match the existing.

Internally, the HMO layout works with the existing room layout within the maisonettes, aside from the first-floor rear, where a bedroom, bathroom, and the hall from the former first-floor entrance, are combined to create a 33sq.m shared kitchen/dining/living space. At lower ground floor level, there are 2no. bedrooms at the front, a shared bathroom, the existing kitchen becomes a utility room, the conservatory remains a shared living space, and the existing rear bedroom, with window into the conservatory, becomes a shared workspace for the HMO residents. At ground floor level there are 4no. bedrooms. At first-floor level there are 2no. bedrooms, a shared bathroom, and the main shared kitchen/dining/living room (with sound proofing on the party wall). At second floor level, within the roof space, the two existing bedrooms and bathroom are retained as existing.

To the rear of the property, in place of an existing outbuilding, the application includes a dedicated cycle shed, hosting 10no. accessible cycle parking spaces, facilitated by 5no. Sheffield stands and a 1.2m wide doorway. The shed itself is a simple, domestic mono-pitched roof structure. At the front of the property, 3no. timber recycling stores ("Bellus 4") are proposed, to host the required three-sets of recycling receptacles issued by the Local Authority. 3no. wheelie bins would also be kept within the front yard, behind the existing soft landscaping but still accessible to the footway for collection.

See plans for full details.

Planning analysis

The current proposal seeks to address the issues raised by the Inspector, in respect of (i) mixed and balanced communities and the effect of HMO concentrations on residential amenity, and ultimately the land-use principle of development. The proposals also seek to resolve the (ii) cycle

parking provision, which was deemed to be inadequate on the recent submission, and the (iii) proposed living conditions for future occupiers of the property.

As, in all other respects, the proposal was found to be acceptable, it is hoped that this new proposal will also be found similarly acceptable, and result in consent being granted.

(i) Mixed and Balanced Communities – principle of development

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."* (paragraph 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 one-bed accommodation will increase by 16.8% over the period, whilst the need for three-bed houses will increase by a broadly similar figure (17.6%).

Further to the 2019 SHMA, the Council has 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.

In terms of rental property more broadly, the Local Authority has publicly acknowledged that the city has a “rent crisis”¹, 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 report by Unipol and HEPI² (October 2023) shows that average student 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 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 2021 Census data reports that, at the Lower Super Output Area (LSOA) geography level ('Zetland Road' E01014670), 24.0% of properties were one-bedroom, 19.9% were two-bedroom, 13.8% three-bedroom, and 42.2% four-or-more-bedrooms (like the existing maisonettes), compared with city-wide figures of 16.2%, 28.4%, 38.8%, and 16.6% respectively. As such, the proposal would contribute towards the identified need for smaller units suited for single people, in an area with a high proportion of multi-bedroom properties, without exacerbating any local imbalance, and the aims of BCS18 would be met. Furthermore, and as noted later in this letter, the proposal would provide HMO accommodation in an area where such accommodation is significantly under the 10% threshold at which harmful concentrations may begin to arise. In this context, the provision of an HMO would therefore help to meet an identified need for accommodation for single-person households.

'Managing the development of houses in multiple occupation' Supplementary Planning Document - The Council's HMO Supplementary Planning Document (HMO SPD) identifies what constitutes a harmful concentration of HMOs. On a street level, this arises when a dwelling is

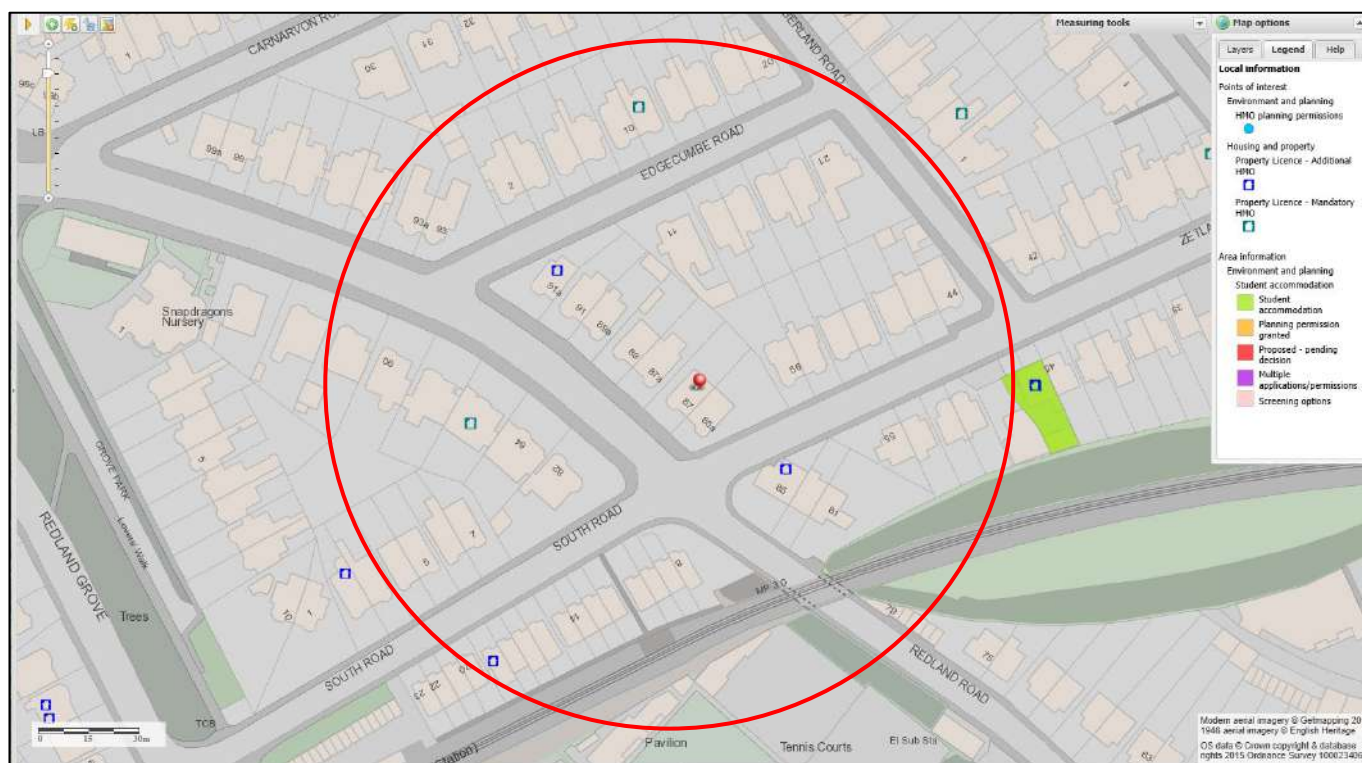
¹ <https://www.bristol.gov.uk/council-homes/tackling-the-rent-crisis>

² <https://www.hepi.ac.uk/2023/10/26/student-rents-now-swallow-up-virtually-all-of-the-of-the-average-maintenance-loan-as-market-reaches-crisis-point-in-affordability/>

sandwiched between two HMOs. On a neighbourhood level, this arises when HMOs comprise 10% or more of the housing stock within a 100-metre radius.

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 are required to manually calculate this figure. Like the appeal proposal, there are currently 6no. HMOs within 100 metres (including the application site itself, if approved), out of 130 dwellings. Below, these HMOs are denoted by the blue/teal house symbols on the map extract and a red pin indicates the application site.

The proportion of licensed HMOs would be less than 5%, and still well within the 10% trigger point threshold, which was common ground for the recent appeal. The only difference in this case, is that there is a newly licenced HMO at No.12 Zetland Road (north of the application site), and the proposals only seek to create a single HMO this time, as opposed to two.



Map, Courtesy of Bristol Pinpoint Mapping, showing site (red pin) and registered HMOs (see map legend) and 100m radius from site (red circle)

In respect of sandwiching, the HMO SPD states, at 4.1, that proposals resulting in *“an existing residential property or properties (Use Class C3) being sandwiched by HMOs on both sides are unlikely to be consistent with Local Plan policy”*, and provides a number of worked examples, including up to three single residential properties between two single HMO properties, but also notes that other sandwiching situations could arise. It was between these two situations where

the Inspector arrived in their assessment of the previous proposal, and they considered there to be three properties between the HMO at No.91A Redland Road, and the application site (although not in a linear sense as set out in the HMO SPD). These would be 2no. ground floor flats at No.91 Redland Road, and the single ground floor flat adjoining the application site at No.89 Redland Road (see illustration, below).

However, the Applicant respectfully disagrees with this assessment, and as assessed on the ground, the Inspector did not to take account that in between Nos.91 and 89, there is a large dental practice, at No.89A, which effectively 'breaks' the sandwiching count of existing residential properties (Use Class C3). Additionally, whilst the Inspector noted at, paragraph 9, that the pairs of properties are separated by generous gaps, the Inspector did not consider the 30m separation between the HMOs as mitigation (see below) and concluded there to be a sandwiching relationship.



Second Floor/Roof	Flat	Flat	Dental Practice	Maisonette	10-Bed HMO	Flat	Flat	
First Floor	Flat	2x Flats				Flat	Flat	
Ground Floor	3-Bed HMO	2x Flats		Flat		Flat	Flat	
Lower Ground Floor	Flat	Flat		Flat		Flat	Flat	
Edgecumbe Road	No.91A	No.91	No.89A	No.89	No.87A	No.87	No.85A	Zetland Road

Approx. 30m

Above: Aerial image, courtesy of Google Maps, of the application site and near neighbours, with the insert (below) showing the breakdown of accommodation type

The Applicant maintains that there is no sandwiching relationship occurring. Especially so, now that only a single HMO is proposed. Notwithstanding, it is important to bear in mind that the HMO

SPD only states that sandwiching *can* result in harmful concentrations at a localised level, and an extract from the HMO SPD, listing the potential harms that can arise, is included below: -

- **Reduced community engagement from residents** resulting from an increase in the transient population of an area;
- **Noise and disturbance** resulting from intensification of the residential use and/or the lifestyle of occupants;
- **Overlooking and loss of privacy** resulting from poorly considered internal layouts and intensification of use;
- **Detriment to visual amenity** resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- **Reduced community services** resulting from a shift in the retail/business offer towards a narrower demographic;
- **Highway safety concerns** resulting from congested on-street parking and poor waste management.

Above: Extract (page 2) from the HMO SPD

It was only at the second bullet point, where the Inspector raised concerns regarding the 2no. HMO/13-bedroom scheme, noting that *"Occupants would be likely to have their own individual routines and carry out activities independently of other occupants within the building. This would be unlike a family operating a single dwelling who would be more likely to do shared activities. There would therefore likely be significantly more comings and goings associated with the HMOs and an intensification of the use throughout the day and into the evening. This would be apparent within the neighbourhood but particularly for the neighbouring occupiers at No 87 who, whilst not sandwiched between HMOs, would be adjacent to two sizeable HMOs and the main entrances to these."* (paragraph 10).

The Inspector considered the various controls available, including licensing, Environmental Health, and a Premises Management Plan, but concluded these would not *"prevent the cumulative impact of 13 or more individuals going about their daily business including their visitors and deliveries."* (paragraph 11).



Above: Photo of the side of No.87 Redland Rd

Before setting out the alternative proposals for consideration, it should be noted that No.87 Redland Road is arranged as 4no. flats and also uses a communal ground floor entrance to the side of the building. The property is listed on Council Tax records as hosting basement, ground, first, and second floor flats. The second floor, within the roof, is listed as band B, with the others listed as band C. So, mirroring the layout of the application site, it is likely, these three band-C flats are larger possibly two-bedroom units. The side elevation of No.87 includes the entrance, a ground floor window, a pair of first-floor windows, and similarly a pair of windows at second floor (roof) level within a dormer (see image, left).

It can be seen by the presence of the soil and vent pipe (SVP) and obscure windows, that bathrooms are located on this side of the property at first and second floor levels. The principal windows for No.87 lie at the front and rear of the property (see photo sheet appended to this letter).

In this context, it is reasonable to consider that as 4no. flats, with likely at least seven bedrooms across the property, No.87 will generate a certain level of activity through individual comings and goings via its own side entrance, beyond that of a single dwellinghouse. Therefore, the nature of activity along the side of these properties is already communal.

Moving to the current proposals and what has been done in response to the Inspector's decision, principally, the proposed occupancy has been reduced from 13no. bedrooms to 10no. bedrooms, a 23% reduction – and for completeness, these would be single occupancy, and as a single shared house.

As well as the reduction in residential use, the proposals incorporate soft-close mechanisms on the main entrance doorway and the cycle shed, to ensure their use, becomes unnoticeable.

Finally, with the amalgamation of the two maisonettes into one shared house, it is possible to remove the external staircase and re-route communal access via the main internal staircase. As can be seen from the image below, and the photos appended to this letter, this staircase provides a platform for significant levels of overlooking, and when in use as a primary access, no doubt leads to noticeable activity – at unusually high level.



Above: Photo from top of external stairs – looking towards Redland Road

The existing maisonettes at the appeal property are substantial and could easily host 4no. bedrooms each without any reconfiguration, therefore there is a baseline level of activity already associated with the two properties. Whilst the Inspector noted that HMO occupants will go about their individual daily lives, it is also true that as a shared house, they would also do things as a group or in friendship groups, which is not uncommon for shared houses, or family dwellings with older children, all with their own work and/or education timetables.

The reduction in bedrooms/people to 10no. from 13no. on the last application, makes a material difference in activity levels, especially centred only on one ground floor entrance for the shared

house. Comings and goings will now not be substantially greater than that of the two large maisonettes. With the removal the external stairs and the use of the soft-close mechanism on the main entrance, even with a level of activity associated with 10no. individuals at ground floor level, the overall result is a betterment in terms of impact on the neighbouring flats at No.87.

The comings and goings of the HMO residents would be domestic in scale and nature and not out of character with an urban location such as the application site. Whilst the Inspector dismissed the licensing regime as a means to protect neighbours; 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. As a requirement of the licensing conditions, the license holder must comply with the 'West of England Code of Good Management Practice', which at condition 8 of the licensing requirements, in relation to neighbours, notes: -

"The Licence holder must take reasonable steps to minimise any nuisance, alarm, harassment or distress that may be caused to neighbours by the way the property is used. The licence holder will provide occupiers of the immediately neighbouring properties a contact telephone number, address or e-mail address to report any problems..." – source Bristol City Council Standards for HMO properties³

The Applicant takes their role as landlord, and a potential license holder, seriously and would adhere to these licensing requirements, as well as the standards set out with regards to room sizes and tenant amenity (covered later in this letter).

In conclusion to the issue, the Applicant maintains that there is no sandwiching relationship created by the current proposals, therefore, there is no requirement for the second step (policy DM2) assessment required, in terms of harm arising from over concentrations of HMO accommodation and any resulting impacts on mixed and balanced communities.

However, should the current proposals be deemed to trigger such an assessment once again, then only the issue of noise and disturbance, solely from comings and goings, is left outstanding. The Applicant has reduced the applied-for occupancy levels, and confirmed that single-occupancy rooms are proposed, whereas the previous Inspector considered that more than 13no. occupiers would have been possible. That is not the current case, and the proposed single HMO replaces two large maisonettes, each with their own associated comings and goings.

³ <https://www.bristol.gov.uk/business/licences-and-permits/property-licences/licences-standards-and-conditions>

The Applicant has also sought to limit activity to the ground floor main entrance, which is to be fitted with a mechanised closing system to mitigate any increase in usage. Furthermore, the removal of the external staircase results in a tangible betterment for the neighbouring four flats within No.87 (whose principal windows are not located within the side elevation in any event).

There is demonstrably not an overconcentration of HMOs at neighbourhood level, and the Applicant maintains a similar stance at street level. In any event, the levels of activity associated with the proposed shared house for ten people, against the existing use of the application site, does not present an identifiable harm, especially with the proposed removal of the external staircase, the use of door closing mechanisms, and the requirement for a mandatory HMO licence, which is a recognised means to control how the property is used.

As such, the proposals would not harm residential amenity and the character of the area, resulting in an unacceptable concentration of HMOs. Furthermore, the proposals would comply with policies BCS18 and DM2 of the Local Plan, which (i) seek to maintain, provide or contribute to a mix of housing tenures, types and sizes and ensure the conversion of properties into HMOs, and (ii) prevent development that would harm the residential amenity or character of the locality.

(ii) Cycle Parking Provision (and Highways)

Whilst previously, the Council objected to the proposal on the grounds of vehicle parking (highway safety), this was not supported by the Inspector (paragraphs 27-32). With the current proposals seeking a reduced overall occupancy, there can be no objection to a car free development once again.

Similarly, it was not considered inappropriate that refuse and recycling storage be located within the front yard of the property, which is once again proposed. The storage of recycling is formalised within 3no. timber stores and wheelie bins are also kept within the front yard, within easy access to the pavement for collection days. Refuse and recycling are provided in accordance with the Council's guidance.

The Council does not have an adopted parking standard for large HMOs (*sui generis*). The Council's Transport Development Management Guide provides advice but is not part of the adopted Local Plan. Notwithstanding, the adopted local plan and the National Planning Policy Framework (the Framework) seek to encourage people to use alternative means of sustainable

transport to private vehicles. Previously, the Inspector held that there was insufficient cycle parking provided, and not in a format that they considered universal for all occupiers.

It can be reasonably assumed that with the entrance to the property up 5-6 existing steps, then residents will have a certain level of mobility, and traversing the 1-2 steps to the rear of the property to access a cycle parking facility would not be a hindrance. In this instance, the Architect has redesigned the cycle parking, which previously made use of an existing shed, and proposes a dedicated cycle shed, with one-for-one parking ratio (10no. spaces) and internal dimensions to meet the Council's guidance. All 10no. spaces are accessible.

As a result of the redesign, the proposals provide appropriate levels of, and suitably located, cycle facilities, which meet the objectives of local policies and the Framework.

(iii) Living Conditions

The appeal decision on the previous scheme found that the lower-ground floor rear-facing bedroom (formerly 'Bedroom 1', with re-positioned window) was not appropriate in terms of living conditions for future occupiers of the site (paragraphs 33-36). This bedroom has been omitted from the proposals, and a shared workspace, akin to a home office, is proposed in its place. This area for home working provides residents an alternative to bedrooms or living room spaces. As a shared communal space, it is also proposed to sound-proof this room on the party wall. This shared workspace is an attractive feature of the HMO and makes a good alternative use of a room with an unconventional window arrangement.

Similarly, the Inspector found that the subdivision of the second floor (roof) front bedroom, within the upper maisonette, to form two HMO bedrooms was unacceptable as each bedroom would be served only by a single rooflight each. However, the Inspector did note that within the existing bedroom, the *"...ceilings are high and whilst the roof is sloping, with light entering from both rooflights, the space appeared light and quite spacious when I visited the site."* (paragraph 37).

The current proposals do not seek to subdivide this bedroom any more, and it is proposed to retain it as a 17.6sq.m bedroom (now Bedroom 10), complete with two rooflights facing southwest and southeast.

The Architect has provided sections of Bedroom 10, and confirmed that floor-to-ceiling heights, beyond the sloping sections, are 2.64m, and the sill of the rooflights are 1.50 and 1.36m above the finished floor level (FFL).

At paragraph 38 of the appeal decision, the Inspector found that whilst the rooflights would provide adequate outlook whilst standing, if one were to sit down, then one would have to look up to take in a view of the sky, and concluded this was an unacceptable arrangement as the *“availability of outlook from shared spaces would not compensate.”* Firstly, the Applicant respectfully disagrees that this is an unacceptable arrangement, especially now as Bedroom 10 replaces an existing bedroom, with no subdivision of the space.

Furthermore, the second floor is not dissimilar to a mansard-style roof, served by rooflights, and it is logical that with the Framework placing emphasis on utilising upward extensions, like mansard roofs, there would be a national presumption that this sort of window arrangement is acceptable. Below are photos of the existing bedroom, and more are provided at the end of this letter. It is the case for the Applicant that the proposed Bedroom 10 provides adequate, dual aspect, outlook whether sitting or standing. Furthermore, the outlook of communal spaces, i.e., the conservatory onto the private rear garden and the shared kitchen/dining/living room at first floor level (rear), also provide excellent outlooks.



Above: photo (1) from within the existing second floor (front) bedroom, proposed to be Bedroom 10



Above: photo (2) from within the existing second floor (front) bedroom, proposed to be Bedroom 10

The Council's HMO SPD identifies, at 4.3, that to “...achieve a good standard of accommodation proposals for the development... of HMOs should be consistent with relevant Local Plan policies and guidance, as identified in section 3.2, and have regard to the standards set out at Appendix B or as current.” These standards refer to the current ‘Minimum Room Size Standards for HMO Development.’

The proposals have been designed in accordance with these standards, and generally surpass them, given that the proposals will require a mandatory HMO licence. As such, it can be demonstrated that the scheme complies with “a good standard of accommodation” as required by the HMO SPD and the application provides a good residential environment for future occupiers of the property, in accordance with policies BCS21 and DM2.

(iv) Other issues

Design and Heritage – The installation of the recycling stores at the front of the property would be domestic in character and appearance, appropriate for the residential setting, and have a neutral impact on the conservation area i.e., a timber structure replacing multiple sets of loose recycling receptacles.

The removal of the external staircase represents a visual improvement to the building, and the streetscene. The stairs are an anomalous feature and detract from the character and appearance of the host property. Their removal (and making good the redundant entrance) will be an environmental benefit arising from the scheme, which in turn, will enhance the character and appearance of this section of the conservation area.

The cycle store to the rear, replaces another domestic outbuilding. It is screened from public view and is set within the context of rear gardens with other domestically scaled outbuildings, sheds, and stores. The cycle store is designed to be an understated structure, yet secure, and clearly subservient to the host property. As such, the proposals are visually acceptable and would ultimately enhance the character and appearance of the Cotham and Redland Conservation Area.

Sustainability - Whilst a change of use proposal (with no element of subdivision) is not required to provide renewable energy sources or detail measures within an Energy Statement; the reuse of an existing building for a more efficient form of residential occupation, in an appropriate location, is a sustainable form of development.

Biodiversity net gain (BNG) – The application site is largely developed and hard surfacing, with the recycling stores and cycle store being sited on existing sealed surfaces. As such, the scheme would be exempt from mandatory 10% BNG. However, should a gain in biodiversity be required, the Applicant would accept the imposition of planning conditions to install bat and/or bird boxes on the property (or cycle store) to encourage nature conservation.

Planning balance and 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 harm arising from any potential sandwiching, and the proportion of HMOs within 100 metres would remain far below 10%. As such, and given the existing use of the site as two large residential maisonettes, there can be no in-principle objection to the property being used as a HMO for ten people, 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 of 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 decisions to grant HMOs in areas where the 10% threshold has not yet been reached.

The proposals would, in effect, provide additional accommodation for 10no. single-person households, meeting a need identified in the latest SHMA and the Local Housing Needs Assessment. As such it would meet the aims of both BCS18 and DM2.

In the context of the Council not having a 5-year housing land supply, not meeting the 2024 Housing Delivery Test (for the 4th consecutive year) and paragraph 11d of the Framework 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; minor economic benefits through increased spending and patronage 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 the visual enhancements arising from the removal of the external stairs.

The proposal would provide a high standard of accommodation and represent a valuable addition to the housing stock in a highly sustainable location, with excellent sustainable transport links. Notwithstanding, cycle parking provision has been provided on a one-for-one basis within a dedicated store with accessible spaces.

The fee will be paid directly to the Planning Inspectorate. If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

Stokes Morgan Planning Ltd



Appeal Decision

Site visit made on 25 February 2025

by Rachael Pipkin BA (Hons) MPhil MRTPI

an Inspector appointed by the Secretary of State

Decision date: 10 March 2025

Appeal Ref: APP/Z0116/W/24/3341445

87A Redland Road, Redland, Bristol BS6 6RD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Haiyan Xu of GHL Properties Ltd against the decision of Bristol City Council.
 - The application Ref is 22/01845/F.
 - The development proposed is Conversion of existing maisonettes into 2no. Houses in Multiple Occupation (HMO) containing 6no. bedrooms (Use Class C4) and 7no. bedrooms (sui generis) respectively, with associated bin and bike storage.
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Decision

1. The appeal is dismissed.

Preliminary Matter

2. The appellant submitted updated plans in respect of the internal space as part of their submission. As these make no alterations to the proposal but provide additional clarity and detail, I am satisfied that no party would be prejudiced by these being considered as part of the appeal. I have proceeded on that basis.

Main Issues

3. The main issues are:
 - the effect of the proposal on mixed and balanced communities, with particular regard to the concentration of houses in multiple occupation (HMOs) and their effect on residential amenity and the character of the area;
 - whether the proposal makes satisfactory provision for cycle parking;
 - the effect of the proposal on highway safety, with regard to car parking provision; and
 - whether the proposal provides satisfactory living conditions for future occupiers, with regard to outlook, natural light and internal space.

Reasons

Mixed and balanced communities

4. Policy DM2 of the Bristol Local Plan Site Allocations and Development Management Policies 2014 (the SADMP) seeks to ensure that new HMOs would not harm residential amenity and the character of the area and seeks to avoid harmful concentrations of HMOs from occurring. Part ii) of the policy sets out the circumstances when a harmful concentration would occur. How this applies in

practice is explained in the Council's Managing the development of houses in multiple occupation Supplementary Planning Document (2020) (the SPD) which applies two tests, one relating to a street level assessment 'the sandwich test', the other a threshold assessment at neighbourhood level, the '10% test'. It is common ground that this neighbourhood assessment has been met.

5. The 'sandwich test' will not be met in a number of situations. Relevant to the circumstances of this appeal are when up to three single residential properties in a street would be located between two single HMOs and/or a single residential property would be sandwiched between two HMOs, either adjacent, opposite and to the rear.
6. Number 87A is a large semi-detached dwelling set over four storeys. It is subdivided into two maisonettes; the lower maisonette would be converted into a seven-bedroom HMO and the upper maisonette into a six-bedroom HMO. It is located in a row of seven similar properties between two side roads. Within this, the ground floor of No 91A, at the end of the row, is a three-bedroom HMO.
7. There are three properties between No 91A and the appeal building. No 89A is a dental practice and Nos 91 and 89 are subdivided into a total of nine flats. In terms of the scenarios set out within the SPD and against which the Council made its assessment, based on numbers of dwellings between the existing and proposed HMOs, there would be nine dwellings in the intervening properties and the dental practice. This would exceed the test of up to three single residential properties. On the other hand, the proposal would result in these properties being sandwiched between three HMOs because of the stacked nature of the proposed accommodation. Alternatively, at ground floor level, there would be three properties between the HMO at 91A and the proposed ground floor HMO. It is evident that the exact scenarios as set out in the SPD do not apply here.
8. The SPD notes that variations to the scenarios it sets out in respect of sandwiching may occur and that is the case here. Given this, it is appropriate to come back to the purpose of the tests which is to deliver on Policy DM2 as referred to above. It is therefore necessary to consider the proposal in terms of its effect on residential amenity and the character of the area to establish whether a harmful concentration of HMOs would occur. The policy explains how harm may arise which includes impacts from noise and disturbance; on-street parking impacts; cumulative detrimental impacts of physical alterations to buildings and structures; or inadequate storage for recycling/refuse and cycles.
9. The area is predominantly residential with Redland Road itself being a relatively busy thoroughfare. Properties are semi-detached with a generous gap separating each of the pairs. The HMOs would be accessed from the side elevation. The entrance to No 87 is opposite the ground floor entrance to the larger HMO and the external staircase to the upper HMO. There are also windows facing towards the appeal property from this elevation.
10. The HMOs would, in combination, provide 13 bedrooms and at least an equivalent number of occupants, potentially more given the large size of some of the rooms. Occupants would be likely to have their own individual routines and carry out activities independently of other occupants within the building. This would be unlike a family operating a single dwelling who would be more likely to do shared activities. There would therefore likely be significantly more comings and goings

associated with the HMOs and an intensification of the use throughout the day and into the evening. This would be apparent within the neighbourhood but particularly for the neighbouring occupiers at No 87 who, whilst not sandwiched between HMOs, would be adjacent to two sizeable HMOs and the main entrances to these. The gap between No 87 and the appeal property would provide a degree of separation but not sufficient to overcome the harm that would arise from the high occupancy of the property by unrelated individuals.

11. There are other controls in place to address possible issues with HMOs including through the Council's licensing of HMOs, Environmental Health legislation as well as the proper management of the HMOs. The appellant has provided an HMO Premises Management Plan for this proposal. This may avoid anti-social behaviour and unacceptable noise and disturbance arising within the property. However, it cannot prevent the cumulative impact of 13 or more individuals going about their daily business including their visitors and deliveries as well as bicycles being brought through the side passage to the rear cycle store and the general level of disturbance that would arise from this.
12. The Council has drawn my attention to a dismissed appeal¹ for an HMO at Number 38 Toronto Road, Bristol where the Inspector applied the guidance in the SPD and concluded there would be an intensification of activities compared to that associated with a family house. I accept the appellant's point that the arrangement of properties along Toronto Road are much closer than in the case here where the appeal property is semi-detached and separated from the neighbour at No 87. Nevertheless, this does not alter my findings that harm would arise from the appeal proposal for the reasons I have set out above.
13. I recognise that the dental practice at No 89 gives rise to frequent comings and goings throughout the day. However, this is during the daytime only during weekdays and the impact is not comparable to that which would arise from the HMOs.
14. There is no evidence of complaints associated with the HMO at No 91A. However, this does not mean additional HMOs in close proximity to this would be appropriate.
15. Evidence drawn from Census 2021 data relating to the Redland Ward in which the appeal property is located indicates a higher proportion of larger properties compared to the city average and a slightly lower proportion of one-bedroom properties. Redland Ward also has a higher proportion of flatted accommodation. The Council has stated that the loss of two existing dwellings would have an impact on the choice of homes in the area but has not addressed the evidence submitted. I do not reach any firm conclusions on this matter as I do not have the full dataset before me. Whilst the proposal would result in too many HMOs within the immediate vicinity of the appeal site which would be harmful to mixed and balanced communities in this location, there is nothing before me to suggest that the proposal would materially impact the choice of housing in the wider locality.
16. It is common ground that the alterations to the property are limited and would not be harmful. The Council has raised no concerns about the proposed arrangements for recycling and refuse storage. I address matters in respect of parking and cycle storage in my next main issue.

¹ APP/Z0116/W/21/3281047 – 38 Toronto Road, Horfield, Bristol BS7 0JP

17. For the reasons I have set out, I conclude that the proposal would harm residential amenity and the character of the area resulting in an unacceptable concentration of HMOs. The proposal would therefore conflict with Policy DM2 of the SADMP as referred to above. It would also conflict with Policy BCS18 of the Bristol Development Framework Core Strategy 2011 (the CS) which seeks to maintain, provide or contribute to a mix of housing tenures, types and sizes.

Cycle Parking

18. The proposed six-bedroom HMO on the upper floors would fall within Class C4, attracting a requirement for three cycle spaces under the Council cycle parking standards. The lower HMO, being larger and categorised as *sui generis*, would require an unspecified number of spaces but at least three.
19. The Council has indicated a need for an absolute minimum of six cycle spaces for residents plus a requirement for visitor parking but argued that with parking difficulties locally as well as the proposal that the scheme should be car free, there should be flexibility for additional cycle spaces up to the number of bedrooms provided.
20. In terms of visitor cycle parking, the standards set a requirement from a threshold of 10 dwellings. As this relates to dwellings, it does not fully align with the proposal here. However, given there would be 13 unrelated individuals occupying the entire property, it is not unreasonable for the Council to require some provision for visitor cycle parking.
21. The proposal makes provision for cycle parking. This would be within the existing secure store in the rear garden which would provide space for at least six bicycles, utilising a semi-vertical cycle rack.
22. The Council's Transport Development Management (TDM) cycle parking guidance² is clear that vertical, angled or hanging storage systems for bicycles are not acceptable because they are difficult to use and can cause damage to bicycles. The proposed use of semi-vertical cycle storage would not be supported, particularly as they are less accessible to those people with impaired mobility, upper body strength or for use with non-standard cycles.
23. The cycle storage within the rear garden would be available to future occupants who could access it through the side gate into the garden. Being positioned in the rear corner of the garden, it would not be in the most convenient location but would nevertheless be capable of providing some secure cycle parking. However, the proposed semi-vertical cycle storage would not meet the required standards. The appellant has argued that since any occupiers would need to traverse several steps to access the property, they would therefore be capable of bumping the front wheel into the cycle rack. However, bikes would need to be partially lifted to insert the front wheel within the rack and this could be difficult for some less mobile or less strong future occupiers. I therefore agree with the Council's concerns that the proposed cycle storage would not be suitable.
24. The appellant has suggested that due to the lower HMO having direct garden access, internal space at both lower and ground floor level as well as some large bedrooms, there would be space for additional cycle storage within the HMO itself

² Bristol Transport Development Management Guide – Cycle Parking, October 2022

if required. However, this would involve either bringing bicycles up the stairs to the ground floor front door into the hallway or bringing them through the garden into the shared living space in order to access the bedrooms. This would not be a satisfactory arrangement particularly as it is likely there would be furniture and other obstacles in the way as well as other residents trying to use the shared space for relaxing outside their bedroom. It would also not meet the needs of people with mobility impairments or those who may require a larger or non-standard bicycle.

25. The TDM guidance requires cycle parking to be accessible and does not support this type of arrangement whereby cycles are brought into the building. The National Planning Policy Framework (the Framework) also requires developments to address the needs of people with disabilities and reduced mobility in relation to all modes of transport. The cycle parking as proposed fails to achieve this. As such, the scheme falls short of the required cycle parking and would therefore not encourage people to cycle regularly.
26. I conclude that the proposal would not make satisfactory provision for cycle parking. It would therefore conflict with Policies DM2 and DM23 of the SADMP, Policy BCS21 of the CS and the SPD which together require proposals to make parking provision in accordance with standards and for development to support cycling provision.

Highway safety

27. Redland Road and the surrounding residential streets lie within a residents' parking scheme area where parking is controlled. Residents have access to parking permits but parking for other drivers is pay and display on weekdays between the hours of 0900 and 1700. The parking scheme is in place to restrict on-street parking in the area which the Council has stated experiences high levels of parking stress. Local residents have similarly highlighted parking issues locally.
28. The appeal property does not benefit from off-street parking. Any occupants of the proposed HMO with cars would therefore need to park on the street. Increased parking arising from the proposal would add to the existing parking stress in the area. This could cause highway safety issues from people driving around looking for spaces or parking inconsiderately given rise to an increased risk of conflict between users of the highway.
29. The appellant has stated that the occupants of the HMO would be unlikely to have a vehicle. Evidence for this is drawn from 2021 Census data indicating that dwellings in this part of the city have a lower than the City-wide average for car access and that privately rented properties, in which category the HMOs would fall, have a significantly higher level of no car availability. The appellant has also relied on a 2019 report produced by a neighbouring local authority³, showing low average numbers of vehicles per HMO household. The evidence is indicative of a lower level of car access or ownership for this type and tenure of property.
30. The site is in accessible location, close to bus stops and a railway station. It is in walkable distance to Gloucester Road Town Centre which provides a wide range of services and facilities. Future occupants may not therefore require access to a

³ Bath & North East Somerset Parking Policy Review – Student, HMO and New Housing Development Research 2019

car. I also accept that as two family-sized maisonettes, occupants may well have had one or two cars.

31. It is proposed that the properties are car-free in that the residents of the HMOs would not have access to the residential parking permits in the area. Permits are issued by the Highways Authority. I appreciate that occupants could get round this by using the pay and display on street parking during the daytime. However, this is unlikely to be a sustainable solution in the long term, particularly as it only permits parking for 3 hours.
32. On balance and taking all these factors into account, it seems unlikely that the proposal would give rise to a significant increase in demand for car parking locally. It would not harm highway safety due to increased on-street parking. It would therefore accord with Policies DM2 and DM23 of the SADMP, Policy BCS21 of the CS and the SPD insofar as they relate to car parking. Together these require appropriate levels of parking, having regard to the parking standards and the parking management regime and to provide a safe built environment.

Living conditions

33. Bedroom 1 of the lower HMO would be located on the lower ground floor. The existing window to the room opens onto a conservatory which would become part of the communal living area for occupants of the HMO. This would be blocked up and a new, tall window would be installed in the rear elevation of the building between the conservatory wall and the shared boundary with the neighbouring property. This window would face northeast.
34. I observed the bedroom to be somewhat gloomy due to the position of the existing window and its enclosure by the conservatory. The proposed window in opening onto the external space may provide more natural light than this. However, it would also be enclosed by the boundary and conservatory walls which are perpendicular to the rear elevation. The room would likely remain gloomy and future occupants would need to rely on electric lighting.
35. The outlook would also be limited due to the enclosing nature of the existing conservatory and boundary. Future occupants would have little in the way of meaningful outlook. Whilst the occupant would have access to the shared kitchen and living room within the conservatory where they could gain outlook onto the garden, this would not compensate for the absence of a decent outlook from the occupant's only private living space.
36. Together, the limited natural light and outlook would result in unsatisfactory living conditions for the future occupant of bedroom 1.
37. Bedrooms 5 and 6 within the upper HMO would be located within the roofspace. Currently they are part of the same room served by two rooflights within the sloping ceiling. The ceilings are high and whilst the roof is sloping, with light entering from both rooflights, the space appeared light and quite spacious when I visited the site. The proposal would subdivide the room to create two bedrooms with additional space to bedroom 6 taken from the existing adjacent bathroom, each would be served by a single rooflight.
38. The bottom of the rooflights are positioned approximately 1.5 metres above floor level. At this height, for someone standing there would be some outlook from the

window, if sitting, they would need to look upwards towards the sky for outlook. This would not provide a satisfactory outlook for occupants of both bedrooms as this would be their only private space. The availability of outlook from shared spaces would not compensate for the substandard outlook here.

39. The submitted floorplan is annotated to show bedroom 5 with a floorspace of 10.98 square metres (sq.m) and bedroom 6 with 8.26 sq.m based on the that available floorspace with at least 1.5m of headroom. The licencing standard is for a minimum of 6.51 sq.m for a single bedroom. Based on these figures, the bedrooms would have sufficient floorspace without restricted head height.
40. The rooms are therefore an acceptable size. They would also benefit from good levels of natural lighting due to the size and orientation of the windows. However, given my findings on outlook, the accommodation would be unsatisfactory.
41. The proposal would not provide satisfactory living conditions for future occupants in respect of natural light and outlook to bedroom 1 of the lower HMO and outlook to bedrooms 5 and 6 of the upper HMO. It would therefore conflict with Policy BCS21 of the CS which requires development to create a high-quality environment for future occupiers. Policy DM29 of the SADMP is cited in the decision notice but as this relates to new buildings, it is not relevant to the proposal before me.

Other Matter

42. The appeal site lies within the Cotham and Redland Conservation Area (the CRCA) which is described as a leafy suburb characterised by its individually developed urban streets, dominated by high-quality Victorian townscape. The appeal property forms part of this historic townscape and contributes to the significance of the CRCA. Whilst the proposal would give rise to some additional activity around the site, there would be limited physical changes to the building which would retain its residential character. The proposal would therefore preserve the character and appearance of the CRCA which I am required to pay special attention to in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning balance

43. The Council cannot currently demonstrate a five year housing land supply and the policies in respect of the delivery of housing are deemed to be out of date. The presumption in favour of sustainable development under paragraph 11d) ii) of the Framework is therefore applicable.
44. The proposal would make a contribution to single-person housing, rental accommodation and potentially, student accommodation, of which there is a shortage within the Bristol area. The availability of such accommodation may help tackle levels of homelessness in the city. This would be in an accessible location. There would be some social benefits from shared living which may help combat the effects of loneliness. Some economic benefits would be derived during conversion works and subsequently through an increased number of individual households using local services and facilities. The proposal makes use of some energy efficiency measures, helping to reduce carbon emissions. Together these combined benefits attract modest weight in favour of the scheme.

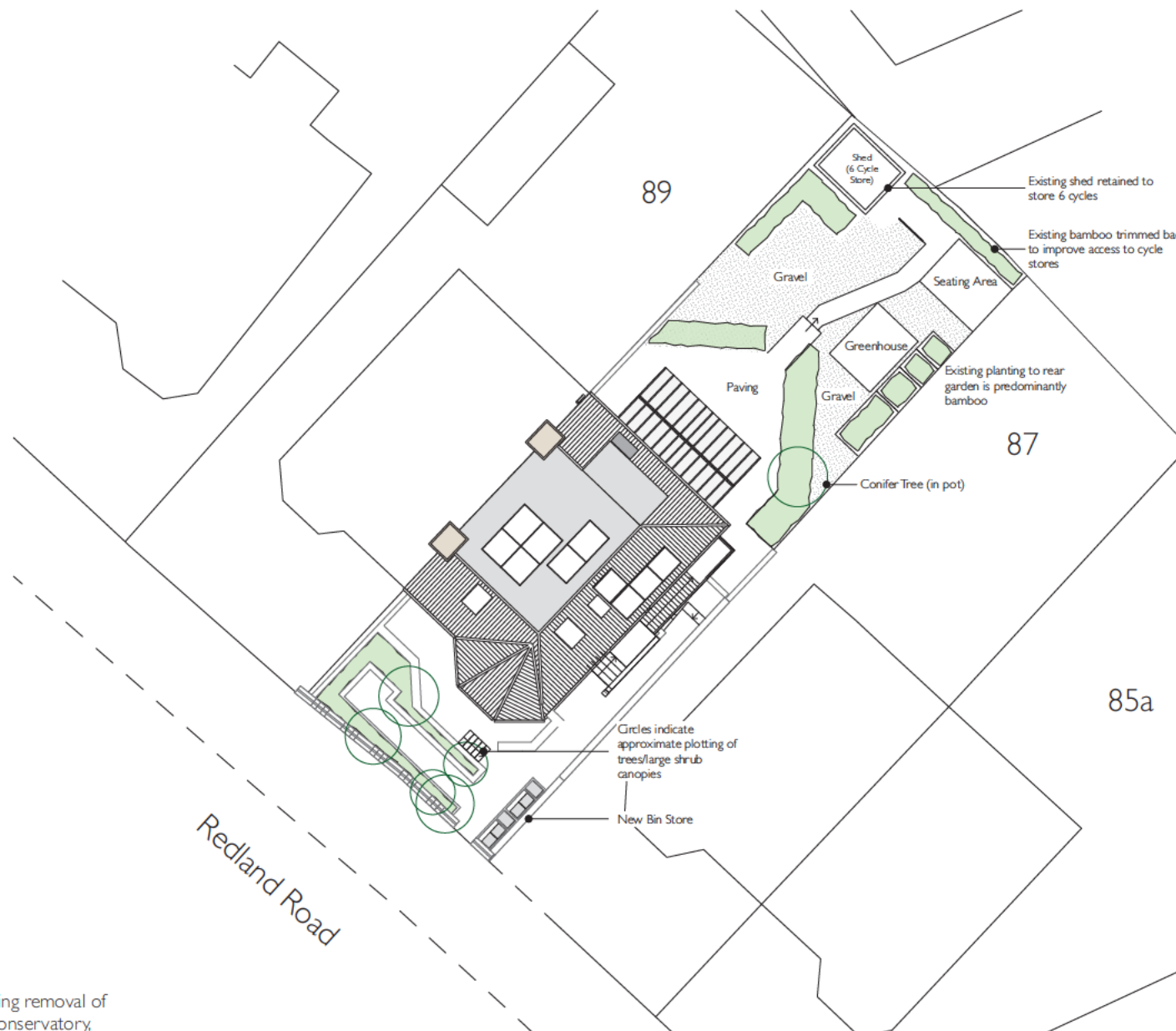
45. The absence of harm to on-street parking and highway safety is a neutral factor. The building is not vacant nor is its lawful use, Class C3 residential, no longer required. Therefore, the scheme does not make effective use of land for housing. This neither weighs for or against the scheme.
46. Weighing against the benefits of the scheme, the proposal would result in a harmful concentration of HMOs with adverse impacts on residential amenity and the character of the area. It would fail to provide satisfactory cycle parking and living conditions for future occupants. These harmful impacts are matters of very substantial weight and importance in the planning balance.
47. My finding is that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. Therefore, the proposal would not constitute sustainable development with regard to paragraph 11d) ii) of the Framework.

Conclusion

48. I find that the proposed development would be contrary to the development plan and there are no material considerations that outweigh this conflict. Consequently, with reference to Section 38(6) of the Planning and Compulsory Purchase Act 2004, the appeal should be dismissed.



INSPECTOR



Revision History

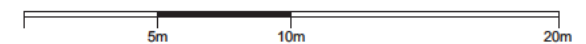
Rev.A 21/03/22 Design updates including removal of new extension and retention of existing conservatory, redesign of bin store and reduction in cycle store size.

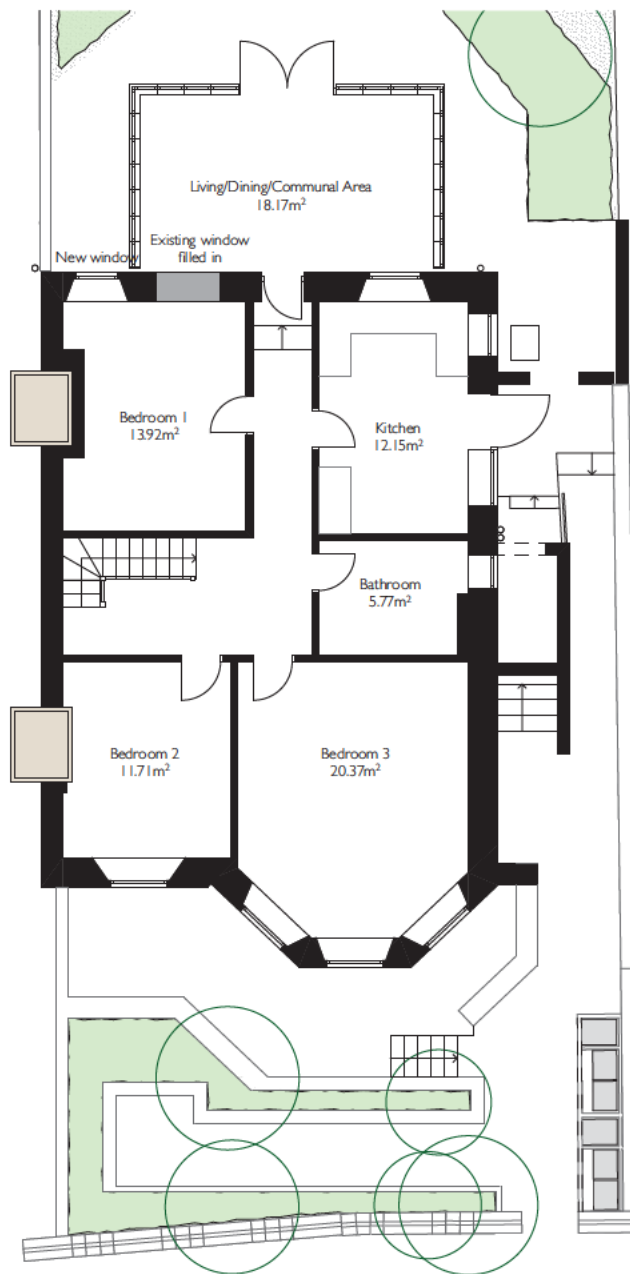
87A Redland Road, Bristol, BS6 6RD

PL06 Rev A
Proposed Site Plan

Scale 1:200 @ A3

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87A Redland Road, Bristol, BS6 6RD

Proposed Lower Ground Floor Plan

PL07 Rev A
Proposed Lower Maisonette Floor Plans

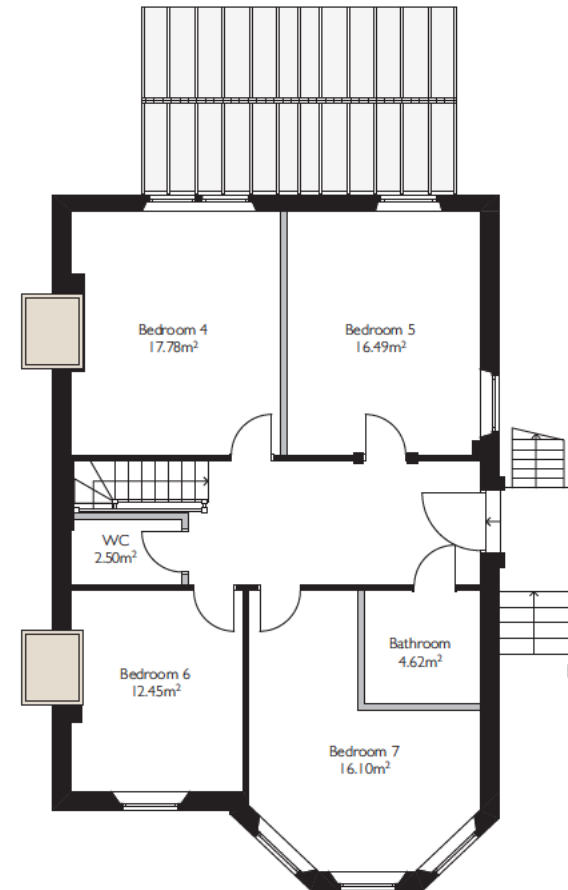
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Revision History

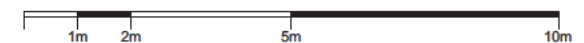
Rev.A 21/03/22 Design updates including removal of new extension and retention of existing conservatory and re design of bin store.

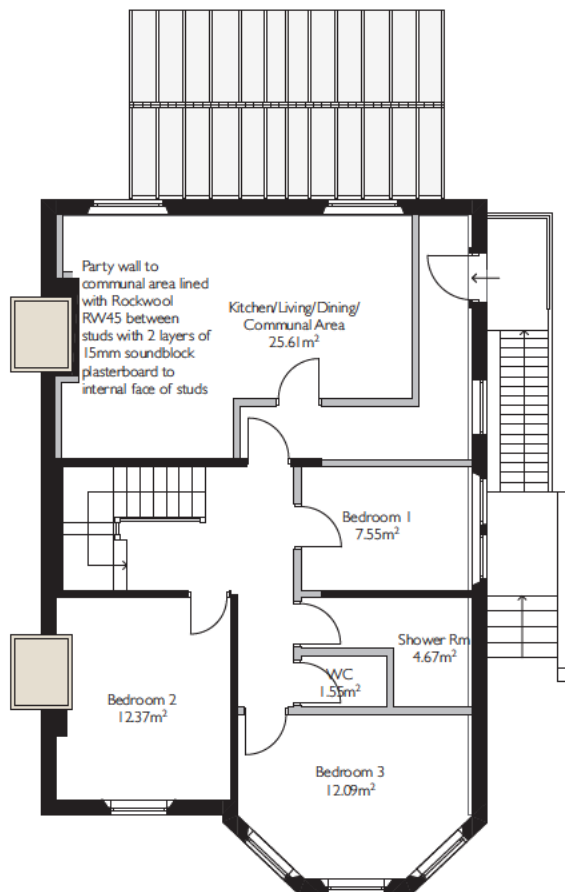


Proposed Ground Floor Plan

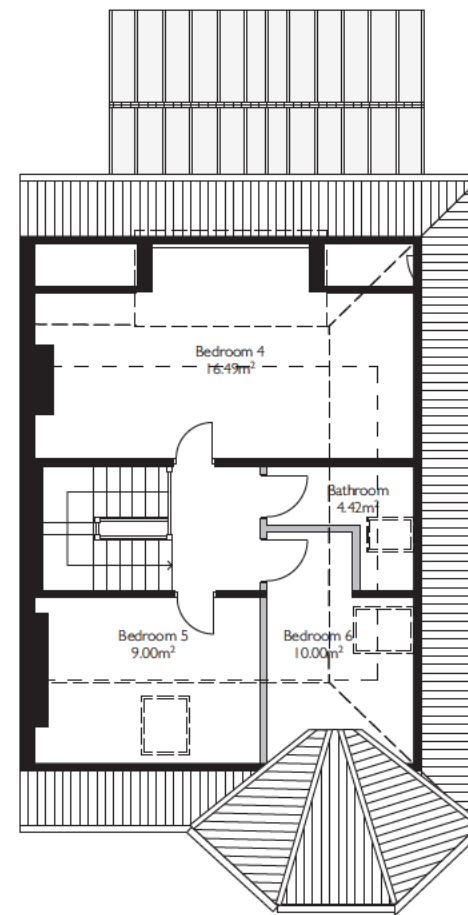
Bin Provision to Each Maisonette

- 1x General Waste Bins 180L each (480x720x1060h)
- 1x 40L kerbside green recycling box (450 x 550 x 450h)
- 1x 40L kerbside black recycling box (450 x 550 x 450h)
- 1x Kerbside tarp sack for cardboard (450x550x450h)
- 1x 25L kerbside organic waste bin (350 x 400 x 450h)

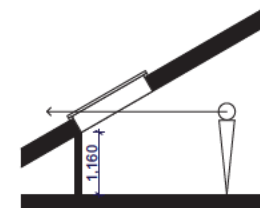




Proposed First Floor Plan



Proposed Second Floor Plan



Note: Eaves 1160mm high internally, view from Velux Rooflights at eye level in Bedrooms 5 and 6

87A Redland Road, Bristol, BS6 6RD

PL08 Rev A
Proposed Upper Maisonette Floor Plans

Scale 1:100 @ A3

Revision History

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Rev.A 21/03/22 Design updates including removal of new extension and retention of existing conservatory.



Photo Sheet



Property frontage (1) – No.87A left and No.87 right



Property frontage (2) – No.87A left and No.87 right



Application site frontage – lower ground floor (front) windows



Application site frontage



Rear elevation and garden of application site



Rear elevation of application site (right), side and rear of No.87 (left)



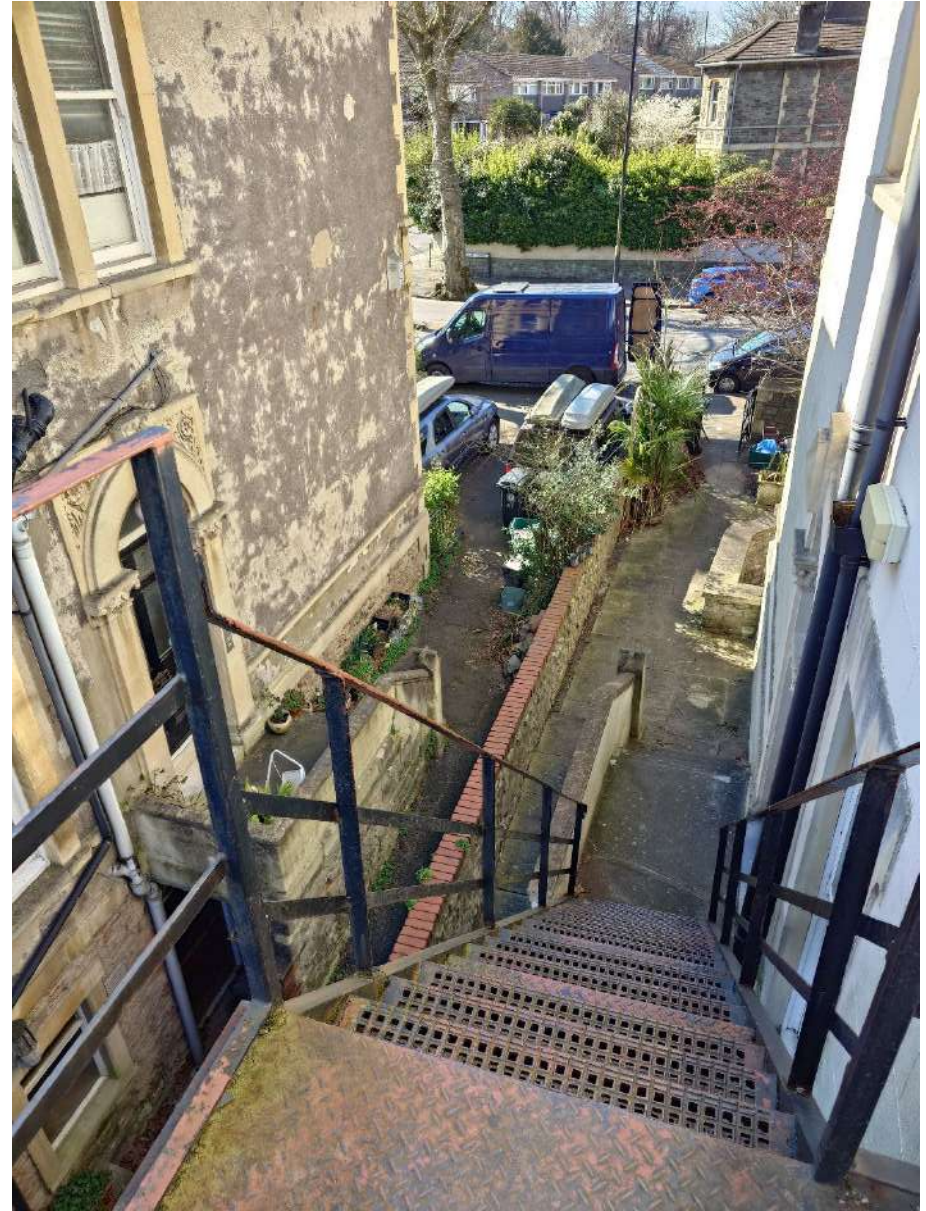
Existing shed in rear garden (to be replaced by cycle shed)



Existing seating area in rear garden



Side access to rear garden and main entrance (left)



View (1) back down from external stairs



Main entrance to 4no. flats at No.87



View back down towards No.87 from external stairs



View of rear gardens from external stairs



View of No.87's rear garden from external stairs



View (2) back down from external stairs



View of side and rear of No.87 from rear garden



Existing second floor (front) bedroom – view 1



Existing second floor (front) bedroom – view 2



Southwest facing rooflight – second floor bedroom



Southeast facing rooflight – second floor bedroom



Second floor bedroom (front) – image from sales particulars prior to Applicant purchase