

Application Reference Number: S62A/2025/0102

Site Address: 87A Redland Road Bristol BS6 6RD

Change of use of existing maisonettes into single house in multiple occupation containing 10 bedrooms.

As the occupiers of [REDACTED] we object to the proposed change of use to an HMO.

The application is basically a repeat of the previously refused application for 2no HMOs, under a different name with 10 rather than 13 residents. The objections are unaltered.

The applicant's case rests on limited argument:

- *It is one HMO not two.*
- *There is a shortage of single person accommodation.*
- *That the density of HMOs does not trigger a refusal under the 10% guidelines in the HMO SPD.*
- *That there is no "sandwiching" of existing properties as defined by the HMO SPD.*
- *It is one HMO not two.*

This is a cynical attempt to ensure ease of compliance with the 10% rule and "sandwiching" of properties. The reduction of legal residents proposed under the licence from 13 to 10 will not be of any significance in terms of the imbalance and disruption it will cause to us or our neighbours.
- *There is a shortage of single person accommodation.*

The applicant argues that there is a need for an increase in single households to free up family space. The maisonettes subject of this application are ideal for family use with good space standards and gardens.

The argument is nonsensical – family accommodation is proposed to be destroyed not "freed up" by this application contrary to the assertion otherwise.

It is argued that a shortage of single person accommodation is increasing the cost of renting. The Universities have a lot to answer for this, but it is disingenuous to suggest that this application is made on ethical social values rather than just a case of cashing in on the market.
- *That the density of HMOs is within the guidelines at less than 10%*

The 10% density is considered "the tipping point for dominance" in a neighbourhood and being supposedly below this level as claimed, should not give carte blanche approval. There are other factors that need to be considered to determine whether the application is acceptable. Density is not just an issue of HMOs.

In 2017 Bristol City Council approved a Planning Approval to convert 91 Redland Road to flats. Approval was granted to 4no 1 person flats at ground and first floor level contrary to their own planning policy of banning this form of flat deemed unacceptable. The upshot of this is that the property has a legal occupation for 12 persons (greater than the HMO applied for), but this does not take account of sharing these 1 person flats, so it is reasonable to assume the number of residents at No 91 exceeds 12 persons.

We therefore consider that the density of occupants within our immediate neighbourhood is already excessive and an approval for the HMO at No 87A will harm the character and amenity of the area and impact us personally. We will have 12 persons in the nearest residential property to the north and 10 persons [REDACTED] at 87A.

We contend that the applicant's statistics for licensed HMOs does not account for there being unlicensed property locally.

Part of this neighbourhood falls in the Cotham Council Ward for which current statistics (4 years out of date) state 1,050 exist.

The applicant also takes into account a radius of 100 metres which is convenient as crossing the boundary of this 100 metres shows a completely different picture in regards to HMO density.

- *That there is no sandwiching of existing properties*

The applicant takes issue with the previous appeal decision stating that the inspector was incorrect in assessing the “sandwiching” by not including the dental surgery at 89A in the count of properties between HMOs.

We believe the previous inspector to be correct in her assessment because as the applicant quotes – “existing **residential** properties”. The key word is residential and the inspector is correct in considering the dental surgery as non residential and as a benign intervention.

It is also important to note the HMO SPD acknowledges it “considers other sandwiching situations could arise” and it is not necessarily cut and dried.

86 Redland Road Upper Maisonette is also not listed as an HMO on the application but it is being used as one.

We believe that the application should be rejected:

- The change from two to one HMO is no improvement
- The previous inspector correctly applied the “sandwiching” guidelines
- The 10% rule needs to be considered with other defining issues that will impact the neighbourhood. Article 4 restrictions on HMO development in this area is an acknowledgement by the council of the continuing problems caused by HMOs and supposed compliance with HMO SPD guidelines should not give automatic consent.
- Control of licensed premises is not as such a planning issue. However over occupation of HMOs is not closely monitored by BCC. The office at ground floor shown on the drawings is likely to be occupied as a further bedroom and all the bedrooms are capable of being shared. We do not have faith in BCC having any active control over this property once approved.
- Comments to recycling storage areas reference 91 Redland Road and bike storage area of 91 Redland Road - this was said in the planning permission for this property years ago but these facilities are never used. With bike stores not being used the amount of vehicles will lead to even more issues parking in the area even with permits due to the location being on the border of 3 other parking zones and a busy dental practice. Currently, it is almost impossible to park within 100 metres of our property.
- In the last year the garden fence in 87a Redland Road has blown down and has not been repaired. In recent months they have held several large parties in the garden that have gone on to the early hours of the morning. Without the garden fence, this means a large group of people have unrestricted view into 89 Redland Road leading to a lack of privacy.

We ask that you refuse the application on the above grounds.