

**From:** Penelope Harnett [REDACTED]  
**Sent:** 10 June 2025 15:22  
**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>  
**Subject:** Section 62A Planning Application: S62A/2025/0102 87A Redland Road, Redland, Bristol, BS6 6RD

Objection to Planning Application for 87A Redland Road.

**Section 62A Planning Application: S62A/2025/0102 87A Redland Road, Redland, Bristol, BS6 6RD**

This is the fourth application for the conversion of 2 maisonettes into an HMO, with the last two applications being rejected on appeal. Many of the main reasons for the rejection of the application have not been adequately addressed in this fourth application.

There are already several HMOs in this area of Redland Road and the conversion of this building will lead to an imbalance in the provision of accommodation which supports the community and is in keeping with the residential nature of the area.

The conversion is at odds with avowed aim of the Cotham and Redland Conservation Area Appraisal 10.25 to encourage the appropriate re-instatement of suitable family dwellings.

We note that the number of children attending our local primary school is decreasing sharply. Recent Ofsted reports for Cotham Garden Primary School indicate that the number of pupils on roll has decreased from 543 on 10-12 January 2023 to 482 10-11 December 2024. This is a significant reduction within a year and indicates that there is lack of suitable family housing in the neighbourhood for children to attend the school.

The proposed conversion is being targeted at the student population. There is already a high proportion of student dwellings in this area and the recent Bristol development plans have identified the harmful effects on local communities when student accommodation reaches saturation point.

The problems which occur when communities are affected by excessive HMOs are well documented in Bristol and in the national press, particularly in terms of excessive noise, disturbance and in the accumulation of rubbish from overflowing bins. There has been no satisfactory resolution to these problems in Bristol from the authorities. We are not convinced that the proposal has taken sufficient account of these issues in the application. Residents in Redland Road, Zetland Road, South Road and Edgecumbe Road are already subjected to late night noise and the creation of further HMOs will only exacerbate this.

The Cotham and Redland Conservation Area acknowledges that the continued conversion of dwellings into HMOs causes increased pressure on the public realm, notably for parking and wastage and recycling provisions. Areas with a high proportion of property lettings and absentee landlords can lead to maintenance issues of houses and gardens (8.2.2.)

Issues arising from the applicant's letter which attempt to address the Planning Officer's rejection of the appeal.

Page 4 – The bedrooms are proposed as single occupancy - this might be the case – but it is highly likely that occupants might choose to share bedrooms with partners/ friends. In addition,

the provision of workspace/living rooms could also result in these spaces being shared within a wider social group other than the 10 tenants of the HMO. Both factors indicate that it is likely there could be more than 10 occupants regularly using the building with attendant overcrowding and noise.

Page 5 Mixed and Balanced Communities.

The applicant uses data from The Wider Bristol Strategic Housing Market Assessment identifying a growth of 34,000 extra single person households 2016 – 2036, but no mention is made that over 25% of the figure 34,000 is accounted for by the 9,300 extra single households needed for those aged over 85 (para 2.17).

This is particularly relevant as the applicant argues, '*Pertinent to the application, the need for HMO and student households (9,400, 20%) exceeds that for families with children.*' This claim does not consider the needs of elderly for one bedroomed accommodation, thereby reducing the 20% claim. Nor the combined needs of families with and without dependent children which is significantly more at 41%.

Page 6. The applicant acknowledges Bristol Council 's claim that there is a rent crisis, but this is not relevant as the application provides no indication as to how the proposal would mitigate the rent crisis.

Similarly, the applicant states, '*It is not outlandish to suggest that the Council's adoption of Article 4 Directions..... has contributed to rising rents, for both young people and employment and students.* We would respectfully suggest that this is not the cause of rising rents. The chief cause has been the expansion of the number of students at both the Universities of Bristol and West of England.

Page 7. The applicant rightly indicates it is difficult to assess the number of HMOs in the area. For examples, we draw attention to the retrospective applications for lawful development certificates currently being lodged with Bristol City Council, including those for 112 Redland Road. 25/11619/CE; 25/11508/CE.

The details on the pinpoint mapping therefore on page 7 are open to debate.

The claim that the application is for only one HMO is irrelevant since the objection is not to the HMO per se, but the number of occupants who will live in the building and also be visiting and working there.

Pages 8-10. The objections raised by the Planning Officer concerning sandwiching are not addressed in this new proposal. The proposed HMO will significantly increase the comings and goings of occupants and an intensification of the use throughout the day and into the evening.

Page 10. The application draws on unsubstantiated conclusions concerning the occupancy of 87, arguing that, '*the nature of activity along the side of these properties is already communal*', This is not the issue - since our objection is that there will be an increase in the comings and goings associated with 87A.

Page 10. The application is requesting a single HMO for '*completeness.*' There is no indication what completeness indicates in this context.

Page 11. The incorporation of soft-close mechanisms to the main entrance doorway is welcomed but this provides no guarantees against the creation of excessive noise - since it is

the noise of and voices of occupants which create the problem, not the excessive slamming of doors.

Page 12. Although The Code of Good Management Practice requires licence holders to take reasonable steps to minimise nuisance etc., in Bristol, particularly in nearby areas such as Chandos Road, this has proved impossible to enforce. Specific arrangements for policing accommodation with the universities have not been fully successful in curtailing noise and nuisance arising from HMOs.

Page 13. The evidence to support the comment. *'There is demonstrably not an overconcentration of HMOs at neighbourhood level and at street level,'* is not supported by any robust data.

Page 13. Cycle Parking. The addition of cycle racks is welcomed. The property is situated in a residential parking zone with limited parking on the roads. This becomes a particular issue at weekends and in the evening when the zone does not operate. It is likely that 10 occupants will have a detrimental effect on parking availability, not necessarily through ownership of vehicles for themselves, but of the number of visitors which 10 occupants will attract to the area. It will also put pressure on existing residential parking and on the paid parking spaces which are important for the Redland Dental Practice and for those wanting to shop and use the nearby amenities on nearby Gloucester and Zetland Roads.

Page 13. Living Conditions. Ground Floor; the shared workspace/home office and utility rooms do not have any outside windows. Bedroom 1 will be very dark with only a small window. On the ground floor there is no toilet or bathroom on the plan. Second Floor Plan - the slant of the roof means that the size of bedrooms 9 and 10 are considerably reduced and the light in the winter will be particularly low.

We urge this planning application to be rejected on several grounds.

- Reduced housing choice resulting from housing type/ tenure imbalance and a shift from family accommodation to accommodation for a more transient population
- Noise and disturbance resulting from the intensification of the residential use/ and or lifestyle of the occupants
- The increase of HMOs in the area; there will still be 10 occupants at least occupying the building even though there is now only one entrance planned and a request for one HMO.
- Potential detrimental impact to availability of parking on the highway.

Penelope Harnett