

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

Our ref: PR0002866

Date: 5th November 2025

Sent via e-mail

Dear Sir/Madam,

Town and Country Planning Act 1990

26 Sturdon Road, Bristol BS3 2BA

Change of use from a dwellinghouse used by a single person or household (Use Class C3a) to a small dwellinghouse in multiple occupation (Use Class C4), including the erection of a cycle and refuse/recycling stores

I write on behalf of my client, Bristol Design Properties Ltd, to apply for the change of use of 26 Sturdon Road, from a dwellinghouse used by a single person or household (Use Class C3a) to a small dwellinghouse in multiple occupation (Use Class C4), including the erection of cycle and refuse/recycling storage. 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 22nd October 2025. I can confirm that the development would not include CIL chargeable development if submitted to the LPA.

I attach the following documents as part of this application:

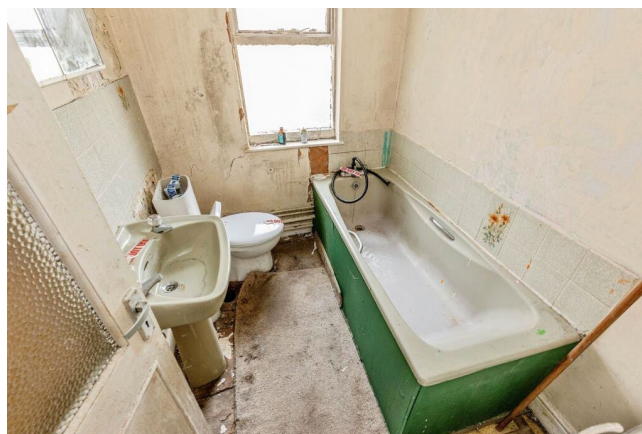
- Completed application and CIL forms;
- Drawing no. 4451.PL.01 rev A – site location plans;
- Drawing no. 4451.PL-02 rev B – existing and proposed block plans (including refuse/recycling and cycle storage details);
- Drawing no. 4451.PL-03 rev A – existing floor plans and elevations;
- Drawing no. 4451.PL-04 rev A – proposed floor plans and elevations;

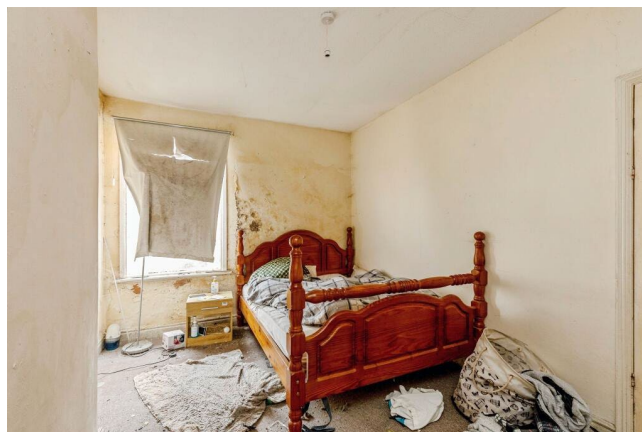
- BNG exemption statement.

Site and planning history

The site comprises an end-terrace dwellinghouse on the north side of Sturdon Road, 30 metres to the east of its junction with Duckmoor Road. There is a two-storey outrigger to the rear, a small enclosed forecourt to the front of the property, and a paved garden to the rear.

There is no relevant planning history, though planning permission was refused for the change of use to 2no. flats in 1988 (ref: 88/01569/F). The property is currently vacant, and in need of complete modernisation, as the photographs below illustrate.





The surrounding area is primarily residential. Luckwell Park (designated Important Open Space) lies at the eastern end of the street, within 50 metres.

The site is covered by the South Bristol Article 4 Direction restricting permitted development rights (PDR) from C3 to C4. There are no Tree Preservation Orders, and no other policy designations apply. The building is neither locally nor nationally listed. The site falls within Flood Zone 1.

The North Street/Southville designated town centre boundary lies 325 metres to the northeast. There are bus stops on Duckmoor Road (within 90-110 metres walking distance) with the 24 service operating every 15 minutes in both directions between Ashton Vale and Southmead Hospital, via Bristol City Centre, whilst Parson Street railway station lies 700 metres to the southeast.

Proposal

My client proposes the change of use from a dwellinghouse used by a single person or household (Use Class C3a) to a small dwellinghouse in multiple occupation (Use Class C4) for 3-6 people. The dwelling would provide six, single occupancy bedrooms. Other than a renewal of the existing fenestration (including sash windows to the front elevation in place of the existing aluminium windows with top-opening fanlights), no external alterations are proposed or required. All bedrooms (which range in size from 8.23sqm to 11.54sqm, with an average room size of 9.2sqm) would exceed the minimum 6.51sqm requirement for a single HMO bedroom.

A 21.68sqm lounge/kitchen/diner is proposed, exceeding the 20sqm minimum total living space and 9sqm minimum kitchen size requirement. Two bathrooms (one per floor) and a separate toilet are proposed.

Refuse and recycling would continue to be stored within the paved area to the front of the house, but within dedicated stores (providing storage for two sets of containers), and a secure and covered cycle store for six bicycles would be provided within the rear garden.

Planning analysis

Housing mix

Policy BCS18 supports a neighbourhood with a mix of housing tenure, types and sizes to meet the changing needs and aspirations of its residents. The supporting text states that evidence provided in the Strategic Housing Market Assessment (SHMA) suggests that new developments should provide for more accommodation for smaller households. The SHMA was updated in February 2019 for the wider Bristol area. This states that single person households are expected to represent 40% of the overall household growth: an increase of 34,000 from 2016 to 2036. The proportion of single person households is therefore predicted to increase from 31.7% to 33.3%, whilst households with children are predicted to remain constant, at 26.2%. 'Other households' (which would include shared accommodation) are predicted to increase from 8.3% to 9.8%.

The 2019 SHMA states that, *"whilst there is projected to be an increase of 34,000 extra single person households, only 14,600 extra dwellings have one bedroom (5,000 market homes and 9,600 affordable homes). This reflects that many single person households will continue to occupy family housing in which they already live."* (para 2.20). It therefore follows that the provision of accommodation for single households (which HMO rooms provide) would potentially free up family housing, in addition to meeting an identified need. The SHMA predicts that the need for 1-bed accommodation will increase by 16.8% over the period, whilst the need for 3-bed houses will increase by a broadly similar figure (17.6%).

Further to the 2019 SHMA, the LPA 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, Bristol City Council 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 recent (October 2023) report by Unipol and HEPI² 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 PDR to create small houses in multiple accommodation, introduced to limit the spread of HMOs, has also contributed to rising rents, for both young people in employment and students. Restricting supply will naturally increase demand.

The Bristol City Council ‘JSNA Health and Wellbeing Profile 2024/25’ reported a near-trebling in the number of households in temporary accommodation from 2019/20 Q3 (573) to 2024/25 Q1 (1554).

In this context, the provision of an HMO would therefore help to meet an identified need for accommodation for single households.

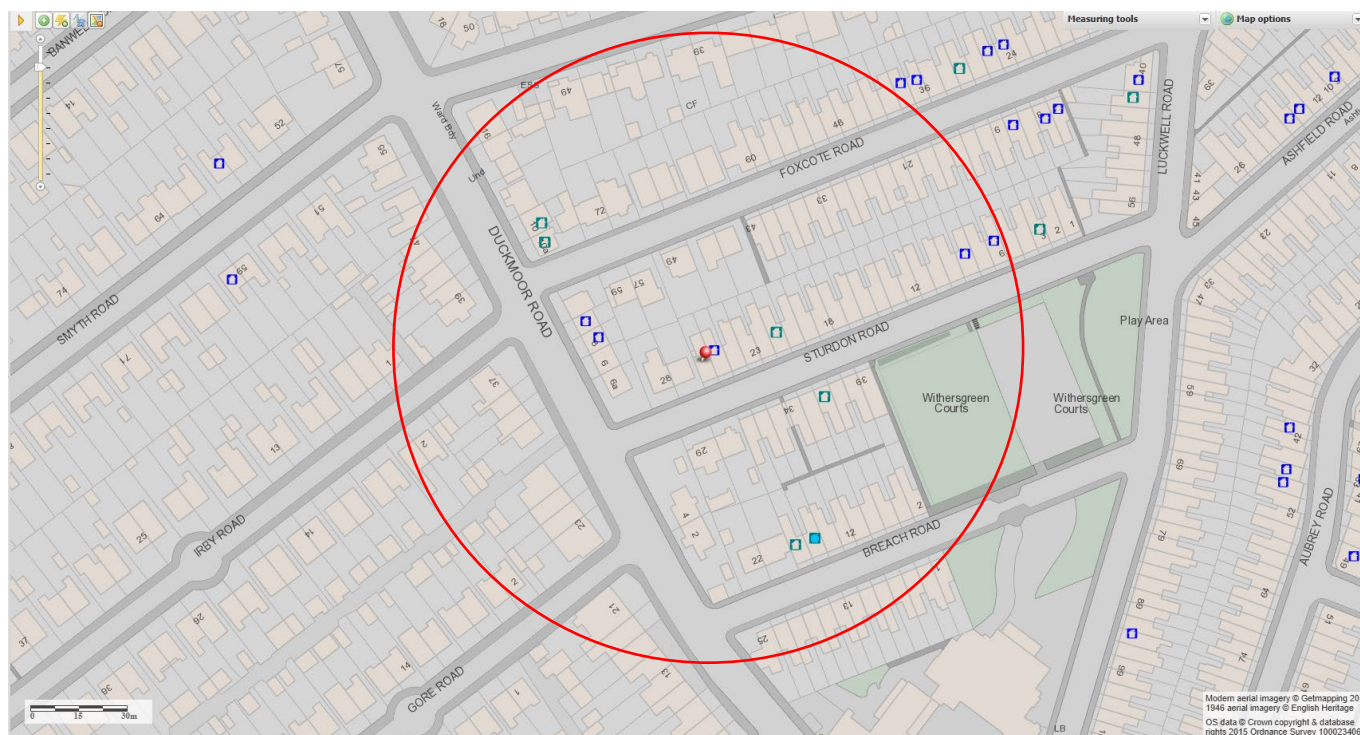
“Managing the development of houses in multiple occupation” Supplementary Planning Document

The Council's ‘Managing the development of houses in multiple occupation’ Supplementary Planning Document identifies what constitutes a harmful concentration of HMOs. On a street level, this arises when a proposed dwelling is sandwiched between two HMOs. On a neighbourhood level, this arises when HMOs comprises 10% or more of the housing stock within a 100-metre radius.

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/>

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 11 HMOs within 100 metres out of 136 dwellings (accounting for flat conversions). The current proportion of HMOs therefore stands at 8.1%. If permission was granted at the application site, the proportion of HMOs would increase to 8.8%. As such, the 10% threshold would not be breached in any scenario.



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

In respect of sandwiching, the SPD provides six examples of where sandwiching situations can occur, none of which apply in this instance. It should be noted that 49 Foxcote Road, to the rear of the site, comprises 2no. self-contained flats, and, whilst not showing on the OS mapping layer, the rear garden appears to have been sub-divided between the two properties. Whilst one of the flats may in theory share boundaries with two HMOs (the application site, and 25 Sturdon Road), these would be in the same direction, and cannot be considered to be a sandwiching situation by any reasonable interpretation of the word. Furthermore, the proposed cycle store would provide a buffer between the two gardens, and 49 Foxcote Road would be separated from the only two windows facing the property by 18 metres (bedroom 6) and 25 metres (bedroom 4). In the case of the latter, the outrigger would also act as a noise break.

It is important to bear in mind that the SPD only states that sandwiching or a breach of the 10% threshold can have *the potential* to create harmful impacts. An extract from the 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.

As the number of HMOs would remain below the 10% recommended threshold, it would not impact harmfully on community engagement, whilst potential noise issues would be mitigated by physical barriers (the outrigger and cycle store) and the layout of the windows. The site is currently vacant and uninhabitable, and therefore its redevelopment would enhance the visual amenity of the area.

With regards to overlooking and loss of privacy, no additional windows are proposed. The only additional development (in respect of visual amenity), would be the refuse/recycling stores, which are policy requirements to address any potential highway concerns, and would be partially screened by the front boundary wall. Given the absence of intensification, and the highly sustainable location, the proposal is unlikely to generate significantly more vehicle movements as a C4 dwelling than as a C3 dwelling, and there is no evidence of a reduction in community services locally, with the nearby Town Centre continuing to more than adequately serve both HMO and non-HMO residents alike.

The SPD also identifies a Good Standard of Accommodation, and proposes to adopt the current standards for licensable HMO properties. It has been demonstrated earlier in this letter that the proposal would exceed HMO accommodation standard requirements.

In summary, none of the potential harms identified with HMOs are present in this particular instance, and there would be no conflict with the relevant local plan policy (DM2).

The principle of HMO accommodation in this location is therefore acceptable, subject to an analysis of neighbour impact, design and parking, which is included below.

Design

Policy BCS21 requires development to contribute to an area's character and identity, creating or reinforcing local distinctiveness.

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

The proposal is for a change of use only, with the only physical alterations comprising the erection of cycle and refuse/recycling stores, the former in the rear garden and the latter within an area currently used for informal refuse storage, and partly screened by the existing boundary wall. As such, the proposal would not unduly impact on the character and appearance of the area. The refurbishment of the property, including new sash windows, would enhance the character and appearance of the area.

Residential amenity

Policy DM2 seeks to ensure that the conversion of properties to HMOs results in adequate residential amenity, does not result in harm due to excessive noise and disturbance, any impact upon street parking, the character of the dwelling or through inadequate refuse or cycle storage.

The requirement for a mandatory HMO licence will help ensure that the property is well-managed, and that the amenity of neighbours is not prejudiced. Whilst a common concern with regards to HMO conversions is an increase in noise and disturbance, these issues, should they arise, can be dealt with through environmental protection legislation, and it would be considered unreasonable to request an HMO management plan in respect of this planning application, or to condition the provision of any such plan, when this separate legislation would apply in any case. In conclusion, the proposal would not give rise to significant harm to neighbour amenity.

With regards to residential amenity, all the bedrooms would exceed the requirements for a single bedroom, and policy-compliant shared facilities (living room and kitchen) are proposed. The rear garden (41sqm) would be available to all occupants, and the site is within 50 metres walking distance of Luckwell Park, a designated important open space, and so future occupants would have reasonable access to outdoor amenity space.

Parking, cycle and refuse/recycling storage

The Council's Waste Guidance states that for every three bedrooms (NB – the guidance does not state that this requirement should be rounded up) a refuse bin, two dry recycling boxes (44ltr & 55ltr), kitchen waste bin (29ltr) and cardboard sack (90ltrs) is required. Storage for 2 sets of containers is proposed.

DM23 states that for both C4 and C3 dwellings, three bike storage spaces are required for properties with four or more bedrooms. Secure and covered cycle storage for 6no. bicycles (one per bedroom, in excess of the policy requirement) is proposed within the rear garden. Whilst this would require occupiers to wheel their bikes through the house, the route is relatively straight, and occupation as a C3 dwelling would require the same arrangement, though with no opportunity to secure cycle storage by way of condition.

DM23 states that the maximum number of spaces permitted for a C4 dwelling is 1.5 spaces (for properties with 3-6 bedrooms). This is in line with the supporting text to DM23, which states, "*The approach to the provision of parking aims to promote sustainable transport methods, such as walking, cycling and public transport, as encouraged by Core Strategy policy BCS10*" (para 2.23.7). The policy also states (in line with the NPPF), that development should not give rise to unacceptable traffic conditions.

It is unlikely that the use as an HMO would generate any more vehicle movements than as a similarly-sized C3 dwelling, or that the proposal would give rise to unacceptable traffic conditions, given the highly sustainable location.

Other issues

Biodiversity net gain

The Environment Act 2021 introduces the mandatory "biodiversity net gain" (BNG) requirement for new housing and commercial development in England, subject to any exemptions that may

apply. The exemptions that apply to the BNG requirements are habitats below a 'de minimis' threshold of 25 metres squared; or five metres for linear habitats like hedgerows.

As the proposal is for a change of use only and the cycle store and refuse/recycling would be erected on an existing sealed surface. The proposal would be exempt from the BNG requirement. If the Inspector considers that the NPPF§187d requirement to provide net gains for biodiversity applies to the application site, then the provision of bird and/or bat boxes could be secured by condition.

Sustainable energy

The application is for a change of use only that involves no increase in floorspace or subdivision of units. As such it is exempt from the requirement for a sustainability and energy strategy, and the need to achieve a 20% reduction in carbon emissions, or to follow the heat hierarchy. The Policies BCS13-15 do not therefore apply in this instance.

CIL

As the proposal is for a change of use with no additional floorspace, the proposal would be exempt from CIL.

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 below 10%. As such, there can be no in-principle objection to the property being used as a small HMO, 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 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 to approve HMOs in areas where the 10% threshold has not yet been reached.

The proposals would, in effect, provide additional accommodation for six households (at a recent appeal at Nailsea Electrical, 102 Gloucester Road, Bristol (ref: APP/Z0116/W/23/3335671), the Inspector concluded that a development of 9no. large and small HMOs would "*introduce more housing choice for those seeking smaller types of accommodation*" (para37)), 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.

The Council has had a housing supply shortfall since June 2021, when changes to the standard method published in December 2020 came into force. At the time, its supply was at 3.7 years, and it has not updated its website with a five year housing land supply report since June 2021. It has dropped as low as 2.2 years, and the latest position made available is 4.14 years (BCC Examination note – 5 year housing land supply (prepared in response to Inspectors' document IN9), as part of the current Local Plan examination). Furthermore, its housing delivery test results for the last six years are (in chronological order from 2018 to 2023) are 99%, 87%, 72%, 74%, 88% and 75%.

With §11d of the NPPF thus engaged, the proposal offers: social benefits through the provision of housing suitable for single person households, whilst providing communal living which can combat the acknowledged health impacts of loneliness; economic benefits through increased spending in the locality; and environmental benefits through the complete refurbishment of an uninhabitable house, and more efficient use of land to provide increased accommodation (over the provision of new-build one-bedroom accommodation). In the context of the Council's current Housing Delivery and Land Supply issues, this should be given significant weight.

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