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Kate Cottrell

S62A/2025/0125
28 November 2025

Dear Sir/Madam

LPA STATEMENT

Application No: 25/14098/PINS
Proposal: Change of use from a dwellinghouse occupied by people to be regarded as forming a single household (Use Class C3a) to a small dwellinghouse in multiple occupation for 3-6 people (Use Class C4), including the erection of a cycle and refuse/recycling stores.
Site Address: 16 Elmgrove Road Fishponds Bristol BS16 2AX

SITE DESCRIPTION

The application site is 16 Elmgrove in Fishponds. The proposal site is a terraced dwelling within an area of the city subject to Article Four Directive, which requires planning permission for change of use to C4, a House in Multiple Occupation (HMO). It is noted that here is an existing HMO property at no.22 Elmgrove Terrace and numerous others within the locality.

APPLICATION

Change of use from a dwellinghouse occupied by people to be regarded as forming a single household (Use Class C3a) to a small dwellinghouse in multiple occupation for 3-6 people (Use Class C4), including the erection of a cycle and refuse/recycling stores.

RELEVANT HISTORY AND OBSERVATIONS

21/01295/F Change of use to a House in Multiple Occupation (HMO) with alterations and loft conversion works, including a rear roof extension. REFUSED 24.09.21 on the following grounds:

1. The proposed development would result in the sandwiching of no.s 18 and 20 Elmgrove Road between two HMO properties being the existing at no. 22 and the proposed at no. 16. In addition the proposed would exceed the 10% threshold requirement of HMOs within a 100m radius of the proposal site. This is considered to

be a harmful concentration of houses in multiple occupation in the locality contrary to sections 3.1, 4.1 and 4.2 of the Managing the development of Houses in Multiple Occupation Supplementary Planning Document Adopted 3 November 2020 and the NPPF 2021

2. The application has failed to demonstrate adequate refuse, recycling and bicycle storage facilities which is contrary to policies DM2 and DM32 of the Bristol Local Plan Site Allocations and Development Management Policies (2014) and the NPPF 2021

The above decision was subsequently appealed under Appeal Ref: APP/Z0116/W/22/3292393. This appeal was DISMISSED on the basis that:

When compared to the standards applied by the Council, the proposed development would exacerbate an existing overconcentration of HMOs in the area. As a result, the proposed change of use would have an adverse effect on the mix and balance of housing in the area. The development therefore conflicts with Policy DM2 of the SADMP, and the guidance contained within the SPD, which seek, amongst other things, to ensure that developments create sustainable, balanced, and mixed communities and prevent harmful concentrations of HMOs.

Notably the Inspector stated the following in paragraphs 8 and 9 of the appeal decision:

8. *The Council and the appellant are in dispute with regards to the number of HMOs within the 100-metre radius. The Council consider that 13.92% of dwellings are HMOs. The appellant has drawn a different figure of 11.4%, however this is still above the threshold identified in the SPD. Whilst the appellants figure is only a marginal increase above the 10% threshold, it would nevertheless reduce the choice of family homes in the area, exacerbate the existing conditions and undermine the objectives of SADMP Policy DM2 and the SPD.*
9. *Additionally, the SPD states that existing residential properties being sandwiched by HMOs are unlikely to be consistent with policy. The SPD provides examples of sandwiching scenarios, with one example being up to three single residential properties in a street located between two single HMO properties. No 22 Elmgrove is an existing HMO property and the conversion of No 16 to an HMO would sandwich No's 18 and 20 between them*

In respect of refusal reason two, the Inspector concluded:

During my site visit I noted that there was sufficient space in both the front and rear gardens to accommodate cycle and refuse storage. Whilst some detailed information had not been provided with the submission, this could be conditioned, were I minded to allow the appeal. However, as I am dismissing the appeal on other issues, I have not pursued this matter further.

For the reasons set out above I consider that the development would make adequate provision for cycle and refuse storage. Accordingly, I find no conflict with Policies DM2 and DM32 of the SADMP.

It is noted that the proposals subject of the Section 62a application is almost identical to that previously refused and subsequently dismissed. Where circumstances have changed this will be indicated below.

INTERNAL CONSULTEES

BCC Transport Development Management commented as follows

Whilst the cover letter mentions a refuse store being installed, this is not shown within the site plan. However, we have no concerns that this could fit within the front porch area and could be conditioned. Therefore, TDM have no objections to this application subject to the following conditions:

1. Further details of Refuse Storage and Recycling Facilities before occupation:

"No building or use hereby permitted shall be occupied or use commenced until detailed designs of the following have been submitted to and approved in writing by the Local Planning Authority:

- Dedicated, suitably screened, ventilated and secure storage for a 180L refuse bin, two dry-recycling boxes (44L & 55L), a kitchen waste bin (23L) and a cardboard waste sack (90L) that complies with the Council's Waste & Recycling Guidance.

The detail thereby approved shall be carried out in accordance with that approval, and thereafter all refuse and recyclable materials associated with the development shall either be stored within this dedicated store/area, as shown on the approved plans, or internally within the buildings that form part of the application site. No refuse or recycling material shall be stored or placed for collection on the adopted highway (including the footway), except on the day of collection.

Reason: To safeguard the amenity of the occupiers of adjoining premises; protect the general environment; prevent any obstruction to pedestrian movement and to ensure that there are adequate facilities for the storage and recycling of recoverable materials."

2. C13A Completion and Maintenance of Cycle Provision – Shown on approved plans

BCC Pollution Control commented as follows:

I have checked our records and cannot see that any noise complaints have been made against this property.

As there does not appear to be any significant intensification of residential use with the change of use from a 5 bedroom single dwelling house to a 5 bedroom HMO I have no objection to this application.

KEY ISSUES

IS THE DEVELOPMENT ACCEPTABLE IN PRINCIPLE?

The NPPF (2024) highlights the need to significantly boost the supply of housing and to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Policy BSC18 of the adopted Core Strategy reflects this guidance and states that "all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities", with reference to the evidence provided by the Strategic Housing Market Assessment, also notes that "developments

should contribute to a mix of housing types and avoid excessive concentrations of one particular type'. The policy wording states that development 'should aim to' contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists.

Bristol comprises a diverse range of residential neighbourhoods with significant variations in housing type, tenure, size, character and quality. A wide range of factors influence the housing needs and demands of neighbourhoods. Such factors include demographic trends, housing supply, economic conditions and market operation. The inter-relationship between these and other factors is often complex and dynamic. In the circumstances, housing requirements will differ greatly across the city and will be subject to change over time. With this in mind an overly prescriptive approach to housing mix would not be appropriate. However, it has been possible to identify broad housing issues that are applicable to many neighbourhoods.

Analysis of the city's general housing needs and demands has identified a number of indicative requirements for each of 6 city zones. The zones reflect sub-market areas used in the Strategic Housing Market Assessment (SHMA). The intention is to provide a strategic steer for all sizes of residential scheme within each zone. A local area-based assessment is required to assess the development's contribution to housing mix as a smaller scale will not provide a proper understanding of the mix of that area; a larger scale may conceal localised housing imbalances. As a guide the neighbourhood is defined as an area equivalent to the size of a Census Lower Level Super Output Area (average of 1,500 residents).

Development of HMOs is covered by Bristol City Council Site Allocations and Development Management (2014) Policy DM2. The policy provides an approach to addressing the impacts and issues that may result from this form of development and aims to ensure that the residential amenity and character of an area is preserved and that harmful concentrations do not arise. This policy does not permit new HMOs or the intensification of existing HMOs where development would create or contribute to a harmful concentration within a locality. The policy identifies a harmful concentration as a worsening of existing harmful conditions or a change to the housing mix that reduces housing choice.

The Council has an adopted Supplementary Planning Document (SPD) relevant to the determination of applications concerning houses in multiple occupation (HMOs): Managing the development of houses in multiple occupation, SPD (Adopted) November 2020 - referred to hereafter as the SPD. The SPD provides guidance in applying Policy DM2 (see above), relating specifically to houses in multiple occupation.

The document recognises that HMOs form part of the city's private rented housing stock and contribute positively to people's housing choice. This form of accommodation is generally more affordable and flexible and therefore suitable for younger people, including students, and other households that are not living as families. It is however recognised that HMOs are more intensive form of accommodation than traditional flats or dwellings. Typically, this increases dependent on the level of occupancy.

General issues associated with HMOs include:

- Noise and disturbance
- Detriment to visual amenity (through external alterations and poor waste management)
- Reduced community facilities
- Highway safety concerns (from increased parking)

- Reduced housing choice
- Reduced community engagement
- Reduced social cohesion

The SPD expands on DM2 to provide a definition of what represents a 'harmful concentration' in the wording of the policy. This relates to two principles; local level and area level. At local level, a harmful concentration is found to exist where 'sandwiching' occurs. This is where a single family dwelling (use class C3) becomes sandwiched with HMOs at sites adjacent, opposite or to the rear. This can happen within a flatted building with HMOs above and below also. With regards to the wider area, a harmful concentration is found to exist where a threshold proportion of 10% HMOs within a 100m radius of the site occurs. This is generally identified as a tipping point, beyond which negative impacts to residential amenity and character are likely to be experienced and housing choice and community cohesion start to weaken.

The application site is located within the Fishponds Road Centre Lower Super Output Area (LSOA) in the Eastville Ward. An up-to-date picture of the proportion of different residential accommodation types in the LSOA can be obtained by assessing the 2021 Census data.

At a more local level, the census data can be reviewed at Lower Super Output Area (LSOA) level to provide an idea of demography more immediately surrounding the site. The site is located within the Fishponds Road Centre Lower Super Output Area. With regard to household types within the Fishponds Road Centre LSOA, census data indicates there are 304 one person households, 417 one family households, 130 multiple person households. Therefore, based on census data 84.7% of households within the LSOA are single households and only 15.3% are shared or multiple occupancy households. As such single households remain the prevailing type within the immediate area and shared housing is not disproportionately represented.

It is recognised that census data is now 4 years old with the existing situation. This is an issue with the frequency of census data gathering which is unfortunately outside the control of the Council. It is recognised that the profile of the area may have changed in the intervening period and the LPA will consider other forms of more up to data which it holds. Nevertheless, the census data for the overall Avonmouth & Lawrence Weston ward does not indicate a particular over proliferation or significant bias towards shared, multi-occupancy housing.

The Council also has access to data in relation to the number of Licenced HMOs (Mandatory and Additional Licences) plus any HMOs that have been given planning permission and do not currently have a licence. This data (as of November 2025) indicates that within 100m of the application site there are a total of 158 residential properties, 14 of which are registered HMOs.

This means that the percentage of HMOs within 100 metres of the site is 8.86%, which is below the 10% desirable threshold quoted within the SPD. As per the SPD guidance, this suggests that negative impacts to residential amenity and character are not likely to be experienced, and housing choice and community cohesion is not currently starting to weaken generally.

That said, at street level, the SPD advises that a harmful concentration is found to exist where 'sandwiching' occurs. This is where a dwelling (Use Class C3) is sandwiched on both sides by HMOs. The HMO SPD states that a potential sandwiching situation can include

where single HMO properties are located in any two of the following locations; adjacent, opposite and to the rear of a single residential properties. The SPD states sandwiching situations apply irrespective of limited breaks in building line, such as a vehicle or pedestrian access, apart from a separating road. This can intensify impacts on individual households even if few HMOs exist locally and can create an imbalance between HMOs and other housing at a street level. Proposals for the development or intensification of houses in multiple occupation are unlikely to be consistent with Local Plan policy where the development would create a harmful concentration of such uses as a result of any residential property or properties being located between two houses in multiple occupation.

As recognised by the Inspector in their previous appeal dismissal, the SPD states that existing residential properties being sandwiched by HMOs are unlikely to be consistent with policy. The SPD provides examples of sandwiching scenarios, with one example being up to three single residential properties in a street located between two single HMO properties. No 22 Elmgrove is an existing HMO property and the conversion of No 16 to an HMO would sandwich No's 18 and 20 between them.

No. 22 at the time of the previous appeal had a HMO licence, at the time of writing this report No. 22 applied for a Mandatory HMO licence in February of this year and the application is pending with a decision due early December. As such it is considered that in this instance, No. 22 remains an HMO (regardless of the status of the licence process) and would thus still result in No's 18 and 20 Elmgrove Road being sandwiched between HMOs.

The proposed development is therefore contrary to the requirements of sections 3.1 and 4.1 of the adopted HMO SPD which specify sandwiching situations to include up to three single residential properties in a street located between two single HMO properties.

(B) WILL THE PROPOSAL PROVIDE A SATISFACTORY LIVING ENVIRONMENT FOR FUTURE OCCUPIERS?

Bristol City Council Site Allocations and Development Management (2014) Policy DM2 states that houses in multiple occupation will not be permitted where:

i. The development would harm the residential amenity or character of the locality as a result of any of the following:

- Levels of activity that cause excessive noise and disturbance to residents; or
- Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or
- Cumulative detrimental impact of physical alterations to buildings and structures; or
- Inadequate storage for recycling/refuse and cycles.

ii. The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:

- Exacerbating existing harmful conditions including those listed at (i) above; or
- Reducing the choice of homes in the area by changing the housing mix.

Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

Adopted Bristol Core Strategy Policy (2011) BCS18 makes specific reference to residential developments providing sufficient space for everyday activities and space which should be

flexible and adaptable. In addition, Policy BCS21 sets out criteria for the assessment of design quality in new development and states that development will be expected to create a high-quality environment for future occupiers. An HMO at this site may require a Mandatory License under the Housing Act 2004. The Local Authority also has adopted amenity standards which apply to HMO's under this separate legislative framework. Whilst it is recognised that this is non-planning legislation and therefore not a material consideration in planning decision making, these standards also provide an indication of the standard of accommodation expected within shared occupancy housing locally.

Planning permission is sought for the change of use of the property from a single dwellinghouse to a small dwellinghouse in multiple occupation for 3-6 people (Use Class C4). It is not confirmed exactly how many people would be accommodated. However, 5 bedrooms are shown. It is considered that the exact number of people to be accommodated should be clarified in the description of development prior to determination.

Bristol City Council has Licencing Standards in relation to HMO accommodations including a requirement in relation to room sizes. A bedroom for a single occupant must measure at least 6.5m² and for 2 occupants at least 11.5m². The proposed floor plans show that all bedrooms as proposed meet these required sizes

Every bedroom in the property will need to comply with the 6.5 square metre footprint for a 1 person bedroom in line with the requirements set out in Bristol City Councils HMO License Standard, as well as the 7.5 square metre footprint for a 1 person bedroom in line with the nationally described space standards (March 2015). This needs to be checked as part of the application assessment. The scheme appears to include an adequate amount of internal communal living space which will also meet the Council's HMO licencing standards (which states that communal living space can include kitchens, dining rooms). The number of bathrooms and toilets will also meet the Council's HMO licencing standards. Every habitable room will also contain a window, providing adequate light for future occupants, with the property as a whole offering adequate levels of outlook and ventilation.

Following the above and clarification of room sizes, it is concluded that the development would likely provide an acceptable standard of accommodation for future occupiers. It is considered that the proposed residential unit could easily be converted back to a Use Class C3 dwelling house in the future, offering a degree of flexibility. The application is subsequently considered acceptable on this basis.

WOULD THE PROPOSAL BE ACCEPTABLE IN TERMS OF THE IMPACT ON VISUAL AMENITY AND THE CHARACTER AND APPEARANCE AREA

Policy BCS21 of the Bristol Core Strategy (2011) requires new development in Bristol to deliver high quality urban design and sets out criteria to measure developments against including the need for development to contribute positively to an area's character and identity, creating or reinforcing local distinctiveness.

Policy DM26 in the Site Allocations and Development Management Policies (2014) expands upon BCS21 by outlining the criteria against which a development's response to local character and distinctiveness will be assessed. This policy states that the design of development proposals will be expected to contribute towards local character and distinctiveness by responding appropriately to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street, skylines and roofscapes. Development should also reflect locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportion. Development will not be permitted where it would be harmful to local character and

distinctiveness or where it would fail to take the opportunities available to improve the character and quality of the area and the way it functions. This policy also states that development should retain existing buildings and structures that contribute positively to local character and distinctiveness.

Adopted Policy DM2 (Residential Sub-Divisions & Specialist Housing) in the Site Allocations and Development Management Policies (2014) states that the conversion of existing houses to HMOs will not be permitted where the development would harm the residential amenity or character of the locality as a result of detrimental impact of physical alterations to buildings and structures or inadequate storage for recycling/refuse and cycles.

The Council has an adopted Supplementary Planning Document (SPD) relevant to the determination of applications concerning houses in multiple occupation (HMOs): Managing the development of houses in multiple occupation, SPD (Adopted) November 2020. The SPD provides guidance in applying Policy DM2 (see above), relating specifically to houses in multiple occupation.

The document recognises that HMOs form part of the city's private rented housing stock and contribute positively to people's housing choice. This form of accommodation is generally more affordable and flexible and therefore suitable for younger people, including students, and other households that are not living as families. It is however recognised that HMOs are more intensive form of accommodation than traditional flats or dwellings. Typically, this increases dependent on the level of occupancy. One of the general issues associated with HMOs identified in the SPD is detriment to visual amenity (through external alterations and poor waste management).

The loft conversion and associated alterations are considered acceptable in terms of design and the impact on the visual amenity of the locality.

With regard to the proposed refuse and recycling and cycle storage, basic proposals are shown with all storage proposed in the small front garden. The cycle storage takes the form of a large metal unit and refuse and recycling shown in the garden with no dedicated store.

As such it is considered that the proposed arrangement of the large cycle unit and unsecured refuse and recycling receptacles as shown would result in harmful visual clutter in the street scene to the detriment of the character of the local area and neighbouring residents.

It is concluded therefore that in order to address the policies set out above, if permission is to be forthcoming, alternative plans should be sought either during the application process or via appropriate conditions showing the cycle store in the rear garden which could be accessed from the rear lane and a dedicated store for refuse and recycling provided in the front garden. If not, the LPA consider that this should also represent a refusal reason.

IMPACT ON AMENITY OF SURROUNDING PROPERTIES

Policy DM2 in the Site Allocations and Development Management Policies (2014) states that shared housing will not be permitted where it would harm the residential amenity or character of the locality as a result of levels of activity that cause excessive noise and disturbance to residents.

Policy BCS21 in the Bristol Core Strategy (Adopted 2011) advocates that new development should deliver high quality urban design and safeguard the amenity of existing development. Policy DM29 in the Site Allocations and Development Management Policies (2014) states that proposals for new buildings will be expected to ensure that existing and proposed

development achieves appropriate levels of privacy, outlook and daylight. This policy, as well as DM27, further states that new buildings will be expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight. Policy BCS23 in the Bristol Core Strategy and Policy DM35 in the Site Allocations and Development Management Policy also state that new development should also not lead to any detrimental increase in noise levels. DM30 expands on this commenting that alterations to existing buildings will be expected to safeguard the amenity of neighbouring occupiers.

It is not considered that the proposed dormer window will result in any unacceptable additional detrimental impact to the current level of residential amenity awarded to the surrounding properties in terms of overlooking loss to privacy. No other external alterations or extensions are proposed to the property other than the dormer window and therefore no concerns are raised in relation to overshadowing or overbearing on neighbours. Please note however, the concerns raised regarding the proposed bin and bike storage and impact on visual amenity above.

Whilst the Pollution Control officer has not raised any concerns in terms of noise and disturbance, the proposals are still considered to have an unacceptable impact on neighbours at No's 18 and 20 Elmgrove Road, for the reasons set out above and below.

DOES THE PROPOSAL ADDRESS MOVEMENT, TRANSPORT AND HIGHWAY SAFETY ISSUES?

Policy DM2 in the Site Allocations and Development Management Policies (2014) states that the sub-division of dwellings into houses in multiple occupation will not be permitted where the development would harm the residential amenity or character of the locality as a result of levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; as well as inadequate storage for recycling/refuse and cycles.

Policy BCS10 in the Bristol Core Strategy (2011) states that development proposals should be located where sustainable travel patterns can be achieved, with more intensive, higher density mixed use development at accessible centres and along or close to main public transport routes. Proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. Policy DM23 within the Site Allocations and Development Management Policies (2014) states that the provision in new development of secure, well-located cycle parking can be very important in encouraging people to cycle regularly. It is important that development proposals incorporate these facilities and parking at the outset of the design process. Applicants should refer to the council's 'Guide to Cycle Parking Provision' for guidance on this matter.

Policy BCS15 in the Bristol Core Strategy (2011) states that all new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of its design. Policy DM32 in the Site Allocations and Development Management Policies (2014) states all new developments will be expected to provide recycling facilities and refuse bins of sufficient capacity to serve the proposed development. This policy further states that the location and design of recycling and refuse provision should be integral to the design of the proposed development. In assessing recycling and refuse provision, regard will be had to the level and type of provision, having regard to relevant space standards; and the location of the provision, having regard to the need to provide and maintain safe and convenient access for occupants, while also providing satisfactory access for collection vehicles and operatives.

The application has been reviewed by the Council's Transport Development Management Team (TDM) who raised no objections to the application on highway grounds subject to conditions to secure adequate bin and bike storage.

TDM have not raised objections on the grounds of lack of off street car parking. The site is in a reasonably sustainable location where it would be easy to live without access to a car. The property should, however, be exempt from future parking permits should a residents parking scheme come forward in the area and an advice to this end is recommended.

Locations are identified for a sufficiently sized cycle store is proposed in the curtilage of the site, alongside a refuse/recycling store. This is considered acceptable in principle highways terms, however further detail would be secured via condition if an approval was forthcoming. This notwithstanding please refer to the concerns regarding visual clutter within the front garden in the key issue above.

SUSTAINABILITY

Current planning policy within the adopted Bristol Development Framework, Core Strategy (2011) requires new development to be designed to mitigate and adapt to climate change and meet targets to reduce carbon dioxide emissions. This should be achieved, amongst other measures, through efficient building design, the provision of on-site renewable energy generation to reduce carbon dioxide emissions by at least 20% based on the projected residual energy demand of new buildings. The approach proposed should also be supported by the provision of a sustainability statement and an energy strategy.

Policy BCS14 states that new development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:

1. Connection to existing CHP/CCHP distribution networks
2. Site-wide renewable CHP/CCHP
3. Site-wide gas-fired CHP/CCHP
4. Site-wide renewable community heating/cooling
5. Site-wide gas-fired community heating/cooling
6. Individual building renewable heating

No strategy has been submitted with the application however, in this instance; the change of use does not result in an increase in floor space or subdivision of units and so is exempt from these energy demands.

SAFETY AND SECURITY

It is not considered that the change of use to a 5-6 person house in multiple occupation will result in any safety or security issues for existing residents in the area.

LPA'S CONCLUSION & RECOMMENDATION

REFUSE:

1. The proposed development would result in an unacceptable living environment and sandwiching effect on the properties known as No's 18 and 20 Elmgrove Road. As a result of being sandwiched by 2no. HMOs on either side of the dwellings, occupiers

of No's 18 and 20 Elmgrove Road are more likely to experience disturbances associated with more intensive housing type, creating a harmful concentration of HMOs in within the immediate locality. This is contrary to sections 3.1 and 4.1 of the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (2020), and Policy BCS18 of adopted Core Strategy (2011), and policies DM2 and DM30 of the adopted Site Allocations and Development Management Policies (2014) as well as the NPPF (2024).

If amended plans were not secured as part of the application process or via appropriately worded condition, the LPA would also recommend refusal on this basis as follows:

2. The proposed development by virtue of the proposed arrangement of the large metal cycle unit and unsecured refuse and recycling receptacles as shown would result in harmful visual clutter in the street scene to the detriment of the character of the local area and neighbouring residents. This is contrary to 'Managing the development of houses in multiple occupation' Supplementary Planning Document (2020), and Policies BCS10, BCS21 and BCS23 of the adopted Core Strategy (2011), and policies DM2 DM23, DM26, DM30 and DM32 of the adopted Site Allocations and Development Management Policies (2014) as well as the NPPF (2024)

Yours faithfully

DEVELOPMENT management