

From: [REDACTED]
Sent: 27 November 2025 21:19
To: Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>
Subject: RE: Objection to Application 25/14098/PINS. 16 Elmgrove Road, Fishponds

Dear Sir/Madam,

PRIVACY REQUEST

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

OBJECTION

I object to the current application (25/14098/PINS) for change of use to a House in Multiple Occupation (HMO) at 16 Elmgrove Road, BS16 2AX on the grounds that:

1) The percentage of HMOs remains above the 10% threshold

The applicant claims that the concentration of HMOs within 100 metres has decreased to approximately 8%. This claim relies on a significantly reduced count of HMOs compared to the Council's 2021 assessment, which identified 22 HMOs and 158 dwellings, resulting in 13.9% HMO concentration (as recorded in the previous refusal and the subsequent appeal dismissal).

There has been no development, conversion, or demolition affecting dwelling numbers in this area since 2021. Therefore, the only explanation for the apparent drop from 22 to 14 licensed HMOs is incomplete or expired licensing data, not a genuine change in land use. The current use of several unlisted properties as HMOs strongly suggests under-representation.

In addition:

- A current property listing (Rightmove, November 2025) advertises 22 Elmgrove Road as a six-bed student HMO.
 - Another live listing advertises 54 Elmgrove Road as a six-bed student HMO — despite these properties not appearing on the HMO licence map.
- These are the two I have found with live adverts as student HMO accommodation but I have strong reason to believe there are a number of others in close proximity serving as HMO's without a license.

This indicates that the applicant's claim of reduced HMO presence is based on incomplete data and highlights it is founded solely on the fact that there are properties being used and advertised as HMO's despite not having licenses.

Even using the most conservative current count — including No.22 as an active HMO — the area remains above the 10% maximum allowed.

2) Sandwiching still applies

One of the two original grounds for refusal, upheld at appeal, was that conversion of No. 16 would result in the "sandwiching" of a C3 dwelling between two HMOs. **This remains valid.**

- No. 22 is still operating as a student HMO, confirmed by a current live listing.
- Therefore, any granting of HMO status at No. 16 would recreate the exact same sandwiching configuration previously found unacceptable.

In planning terms, the physical and functional relationship between these properties is unchanged since the refusal and appeal — and therefore, the policy test outcome must surely remain unchanged.

3) No material change in circumstances

The applicant's case depends entirely on asserting that the circumstances have materially changed since the previous refusal.

However:

- The housing stock has not changed.
- The physical layout of the street has not changed.
- The number and distribution of HMOs in actual use has not changed. (increased if anything as unlicensed landlords are evidenced to be active in the area).
- No HMOs have been visibly reverted to family use.
- Student letting demand in the area is unchanged or higher.
- Active HMO use is evidenced independently of the licence register.

Therefore, the policy environment and neighbourhood character remain the same as at the time of the refused application and dismissed appeal, and the original reasoning remains applicable.



Conclusion

Under the Bristol HMO SPD, I understand it that the proposal fails on two decisive counts:

- **It breaches the 10% HMO concentration threshold, even under conservative assumptions.**
- **It fails the sandwiching test, as No. 22 remains actively used as a HMO.**

There is no credible material change in circumstances since the previous refusal, and the application should again be refused for the same reasons.

I thank you for your time in considering this email.

Yours sincerely,



Here are the 2 live adverts for number 22 and 54

https://www.rightmove.co.uk/properties/169720988#/?channel=STU_LET

rightmove.co.uk

BS16 2AX X Within 1/4 mile Min Price to Max Price Min Beds to Max Beds

£2,250 pcm
£519 pw

XENO PROPERTY 0117 463 3298 Local call rate Contact Save



Are you Renters' Rights ready?
Check out our Landlord's guide to the new rules – find out more
oceanhome.co.uk

1/11



Elmgrove Road, Bristol, BS16

End of Terrace 6 2

0.00 miles

Luxury Student Property- Situated for UWE Students- 6 double bedrooms.

Added on 03/11/2025 by Xeno Property, Bristol

XENO PROPERTY 0117 463 3298 Local call rate Contact Save

1/10



Fishponds Road, Bristol, BS16

Bungalow 4 3

0.13 miles

4 ROOMS AVAILABLE IN & BEDROOM LUXURY STUDENT

