

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

Our ref: PR01882

Your ref:

Date: 10<sup>th</sup> December 2025

**Sent via e-mail only**

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**33 Brockworth Crescent, Stapleton, Bristol. BS16 1HQ**

**Change of use of small House in Multiple Occupation (Use Class C4) to a large House in Multiple Occupation for up to 8no. occupants (*sui generis*), with associated cycle storage.**

We write on behalf of our client, Lodgeway Properties Ltd, to apply for a change of use of the above property, from a small House in Multiple Occupation (HMO, Use Class C4) for up to 6no. people sharing, to a large HMO (*sui generis*) for up to 8no. people sharing. No external alterations are proposed to the property to facilitate the conversion, aside for the installation of additional cycle 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 20<sup>th</sup> November 2025. We can confirm that the development would not generate any CIL liability (no change in floorspace). We attach the following documents as part of this application: -

- Completed Application Form and Ownership Certificate;
- CIL Form 1;
- Drawing no. 4455.PL.01A – Site Location Plan;
- Drawing no. 4455.PL.02B – Block Plans;

- Drawing no. 4455.PL.03B – Existing House Plans;
- Drawing no. 4455.PL.04A – Existing House Elevations;
- Drawing no. 4455.PL.05B – Existing Outbuilding;
- Drawing no. 4455.PL.06B – Proposed House Plans;
- Drawing no. 4455.PL.08B – Proposed Outbuilding; and
- BNG Exemption Statement.

### **Site and planning history**

The site forms one of a pair of semi-detached properties, with associated detached outbuilding (with habitable accommodation within), a large rear garden, and off-street parking. There is vehicular access to the front and rear via Begbrook Road. Site photographs are enclosed with this letter.

The Applicant purchased the property at the start of 2021 and the property was already occupied as a shared house, with 4no. tenants. The property is not located within an Article 4 area and therefore its use is lawfully interchangeable between that of a single dwellinghouse (Use Class C3) and a small HMO for between 3-6no. occupants (C4). The Applicant has completely refurbished the property and its grounds and it has been let as an HMO to groups of 6no. students each academic year since at least 2022, overseen by the Council's (HMO) Licencing Team.

The site is in Flood Zone 1, the lowest risk of flooding and no other relevant policy designations apply to the site, including any Article 4 Direction restricting normal permitted development rights (PDR).

The site lies on the east side of Brockworth Crescent, a residential road part of a twentieth century housing development off Frenchay Park Road. There are both inbound and outbound bus stops, within 400m of the site, serving 4no. routes between Bristol (city centre), Bath, Parkway Station, Coalpit Heath, and Frenchay, including routes via UWE, with the Frenchay Campus 1.5km to the north.



**Above: Aerial image, courtesy of Google Maps, showing the site, approximately outlined in red**

There are local shops and services, 230m to the northwest, on Frome Valley Road including a convenience store, pharmacy, and takeaway. Supermarkets are found in Fishponds and Eastville to the southeast and southwest, and in Filton to the north. Begbrook Green Park is a 400m walk to the northeast and Snuff Mills/Oldbury Court Estate lies on the other side of the river valley (500m walk to the nearest river crossing point).

There is planning history associated with the site, which is relevant to this submission. In 2021 an application (ref. 21/01661/F) was made to extend the property significantly, as well as converting the outbuilding to habitable accommodation, to create a total of 11no. bedrooms across the site used as a single HMO. This application was withdrawn in February 2022 following objections from Officers.

Following this, a scaled-back application (ref. 22/03100/F) was made in June 2022 for the change of use of the property to an HMO for up to 8no. occupants, with 6no. within the house, and 2no. bedrooms within the converted outbuilding. Despite the Applicant liaising with the Council's (HMO) Licencing Team, who were satisfied with the proposals, the application was once again, withdrawn in October 2022, as Officers identified a 'sandwiching' situation, and had reservations of the use of the outbuilding as accommodation (in terms of noise and disturbance).

Subsequently, the Applicant opted to fit out the outbuilding for additional residential accommodation (something not requiring any permission as it was not development), and

create the 2no. bedrooms separate from the house (but part of the household and making use of the shared facilities within the host building), whilst re-purposing 2no. former bedrooms within the main house as storage and a study, thereby maintaining 6no. occupiers across the site and a single Use Class C4 planning unit across the site.

In November 2023 the Council's Planning Enforcement Team investigated the situation at the application site (Council ref. 23/30426/HMO) and found there to be no breach of planning control, with the site operating as a single small HMO. The Council's assessment summary is appended to this letter.

For the last three academic years the Applicant has lawfully hosted a group of students at the property, with two of the sharers occupying the outbuilding. Not only is there a demand for such arrangements (more on this below), but it was also a chance for the Applicant to demonstrate 'good books' in terms of the use of the outbuilding. The Applicant is not aware of any complaints arising from its use as accommodation, and continues to be licenced by the Council to operate the HMO.

## **Proposal**

This proposal is made now to revert the two rooms in the main house from storage and a study room, to 2no. additional bedrooms, taking the site's occupancy to 8no., making it a large (sui generis) HMO.

The accommodation within the outbuilding will remain as is, as will their access to the shared facilities within the host property. There is currently policy-compliant bin storage for the number of occupiers proposed, and the additional two occupants will be provided with dedicated cycle storage (2no. Sheffield spaces within a secure and covered shed), in addition to the existing cycle parking for the other 6no. occupiers. Otherwise, no external alterations are proposed.

## **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 Council published the "City of Bristol Local Housing Needs Assessment Report of Findings" (November 2023), as a background paper to the new Local Plan (at examination stage). This predicts that, for the period 2020-2040, single person households will represent almost a third of the overall household growth (15,000, 32%).

In terms of rental property more broadly, the Council has publicly acknowledged that the city has a *"rent crisis"*<sup>1</sup>, 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. An October 2023 report by Unipol and HEPI<sup>2</sup> 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 permitted development rights to create

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<sup>1</sup> <https://www.bristol.gov.uk/council-homes/tackling-the-rent-crisis>

<sup>2</sup> <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/>



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.

In this context, as an existing small HMO; the provision of additional HMO rooms (without the loss of existing family housing) would therefore help to meet an identified need for accommodation for students and single households in general.

#### *Principle of development*

Prior to assessment, the decision maker should be aware, that the application seeks only an increase of occupation by 2no. bedrooms/occupants, changing the use of the property to a single large HMO (*sui generis*). No works to the building are required, only the allocation of the storage and study rooms as two further bedrooms. Only the additional cycle store and an update to the HMO Licence are needed.

HMOs can make a valuable contribution to the housing stock of an area, suitable for single people, and in this case, students in close proximity to UWE Frenchay Campus. Local Plan policy DM2 is a restrictive policy which will not support the conversion (or intensification) of properties into shared accommodation (HMOs), 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.**

**Above: Extract from Policy DM2: Residential Sub-divisions, Shared and Specialist Housing**

This letter will demonstrate compliance with the above, and with the Council's adopted Supplementary Planning Document: Managing the development of houses in multiple occupation (November 2020 "the HMO SPD").

The policy DM2 criteria, listed above, are met by the proposed development. As a starting point, the property is an existing shared house, and the proposals only seek an intensification of that use. Effectively, the judgement to be made is whether the additional 2no. sharers (within the main property) would impact on the amenity of neighbours in what is an existing residential area. Given the existing use, the size of the property and its garden, the professional management of the property, and the separation with neighbours; the proposals would not cause excessive noise and disturbance to residents.

This has been evidenced over the past three years, where 2no. of the sharers have had their bedrooms located within the outbuilding, whilst making use of the main shared facilities within the host property, without incident, and it is assumed that the Council will confirm this in their response. The rear garden, parking, bin, and bike storage have all been in shared use, and activities have not resulted in any undue noise and disturbance above that expected with a residential property. The additional 2no. occupiers would not intensify the level of occupation to a degree that would raise concerns in these regards.

Additionally, despite the site's peripheral location, it is well served by public transport and is close to cycle routes (7km/24 mins to the city centre and 1.5km/7 mins to UWE Frenchay Campus). There are parking restrictions (double-yellow lines) locally to prevent dangerous/obstructive parking and moreover, the proposals include safe and accessible parking for 4no. cars. Therefore, with the parking restrictions in place, and the accessible location of the site, there would be no justifiable reason to refuse the proposals on parking grounds.

No external alterations are proposed, aside from the bespoke bike store, which would not cause cumulative detrimental impact to the building, and sufficient space current exists to adequately store refuse/recycling receptacles (2no. sets, in accordance with guidance for 8no. occupiers), and the existing occupants benefit from dedicated cycle parking (covered and lockable spaces) within the site. As such, the proposals pass part (i) of policy DM2.

In terms of part (ii), the development would not create or contribute to a harmful concentration of such uses within the locality because of either (a) exacerbating existing harmful conditions, as none are known within this area, with most (93%) of the housing in the neighbourhood being

single dwellings, or (b) by reducing the choice of homes in the area, as the use of the property would remain as an existing HMO.

Notwithstanding and regarding these two assessment points ((a) and (b)); an assessment was undertaken to establish (a) the number of similar shared accommodation units within the immediate area, and (b) what was the housing mix, at a neighbourhood level. That assessment is appended to this letter.

The HMO SPD sets out the necessary tests for assessing the neighbourhood level, with a threshold proportion of 10% HMOs as the likely upper limit. There are only 5no. other HMOs within the vicinity/100m of the site amongst 83no. properties, as defined by the SPD (see appended assessment). Sources used were Bristol City Council Pinpoint Mapping (showing licenced premises), planning history searches, and the Council's Register of Licenced Premises. Whilst one property has planning permission to be an HMO, it does not currently benefit from an HMO Licence, but has been counted, nonetheless. Including the application site, which is already an HMO, the number of HMOs equates to 7% of the neighbourhood housing stock. Therefore, the proposals will not lead to an unacceptable concentration of HMOs or exacerbate any existing harmful conditions.

The HMO SPD also requires that proposals do not result in any 'sandwiching' effects. It states that *"proposals for additional bed spaces within existing HMOs sandwiching residential property are unlikely to be consistent with Local Plan policy."* The document lists the various scenarios considered to be sandwiching, which includes up to three single residential properties in a street located between two single HMO properties.

In the instance of this application, Nos.27, 29, and 31 Brockworth Crescent are already located between the site (an existing HMO) and No.25 Brockworth Crescent, another HMO of up to 8no. occupiers according to planning history (but no HMO Licence).

There is no evidence that the intensification of the use of the application site would be contrary to Local Plan policy, as reported within the HMO SPD. Given the suburban nature of the development, the size and style of the houses, and the separation distances involved combined with a different orientation for No.33 (effectively turning the corner); no unacceptable harm, beyond the existing situation would occur to justify and sustain a refusal.

The context of the application site is suburban, and greater breathing space exists, as do intervening boundaries. Moreover, of these three non-HMO properties (single dwellinghouse, Use



Class C3), none of them would have an HMO on both sides (although it is noted that No.27 Brockworth Crescent already has No.25 to one side and No.32 Dryleaze Road to the rear).

This issue was recently examined by an Inspector for an HMO proposal at 163 Wordsworth Road, Horfield, Bristol BS7 0EQ (ref. APP/Z0116/W/25/3360210). Here, the proposal was to convert a dwellinghouse to a 6no. bedroom HMO. The main issue was the effect that the proposal would have on the living conditions of the occupants of 165 and 167 Wordsworth Road, with regard to noise and disturbance – as these two properties were 'sandwiched' by the proposal and an existing HMO at No.169 (a 7no. bedroom HMO).

At paragraphs 11-14, the Inspector concluded: -

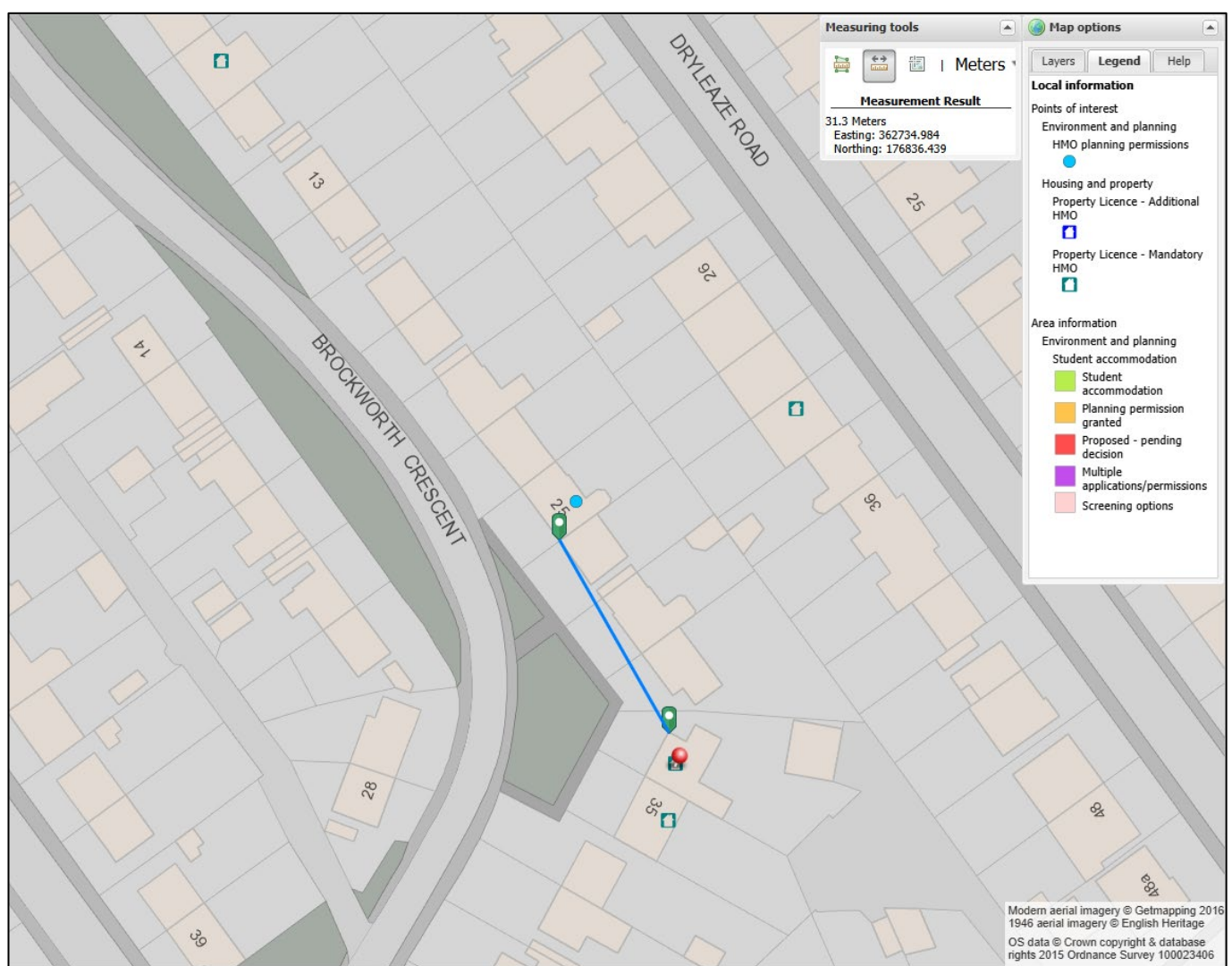
*"11. Although I attribute significant weight to the guidance within the [HMO] SPD, there are other material considerations against which the proposals should be weighed. In this instance the nature of the use, the fallback position, the specific relationship between the properties and the concentration of HMO's within the local area more generally.*

*12. The proposal is for a 6 bedroom HMO falling under Use Class C4. C4 uses, which may have up to 6 unrelated residents are generally considered to have a levels of activity broadly compatible with existing residential uses. This is reflected in the fact that typically planning permission is not required for the change of use from Use Class C3 to C4. In this instance an Article 4 direction prevents permitted development rights being exercised.*

*13. Whilst there is the potential for a 6 bedroom HMO to have a greater level of noise, disturbance and activity than a 6 bedroom dwelling, I do not consider the difference would be harmfully significant. In this case the fallback position, being a 6 bedroom dwelling, has the potential to generate similar levels of activity.*

*14. In considering whether the concentration of proposed HMOs would be 'harmful', it is necessary to take into account the physical relationship and proximity between the HMO's and the dwellings. Notwithstanding the advice given in para. 4.1 of the SPD, the break in the building line, the resulting separation between the buildings, and associated boundary treatment would have a mitigating effect on disturbance originating from the HMOs. Furthermore, it is worth noting that each dwelling would only be exposed to an HMO on one side."*

In that instance the Appellant highlighted the fact that the suburban setting, 21m gap between the existing HMO and appeal site, plus the gaps between the houses and their intervening boundaries would be a mitigating factor (beyond what one would expect in a much finer grained urban layout found within the inner-city housing areas). In the case of this proposal, the frontage gap between the application site and the existing HMO at No.25, is 25m, and 31m between the closest parts of the buildings (see map extract, below). It is also a material consideration, that the application site is 90-degrees to the 'sandwiched' non-HMO properties, which would mean use of the rear garden at the application site would be less noticeable than if it were a linear row of properties.



**Above: Extract from the Council's Pinpoint mapping service, showing the application site (red pin), existing HMOs**

Given these physical characteristics, and the low-levels of HMOs within the neighbourhood (7%), whilst sandwiching already occurs; (i) it is demonstrably not harmful currently, with the operation of the application site as a six-person HMO, and (ii) the intensification of the use by adding two

further occupiers to the main building would not exacerbate any harmful existing conditions or create any.

For further local context and linked to the number of existing HMOs in the neighbourhood, is the overall housing mix within the local area. This geography is usually defined as a Local Super Output Area (LSOA), something used when collating Census information, and contains roughly 650 households. The site sits within the 'Broomhill' LSOA (ref. E01014587), which is listed as containing a mix of 77% houses, and 22% flatted or shared properties. In fact, the latter figure of shared properties is only 1.5% of the overall housing stock in the LSOA. In comparison, the number of houses is higher than both the ward and city as a whole. Similarly, the number of shared properties is also lower than at ward (5%) and city (10%) levels. The proposals would therefore not result in the loss of a single dwellinghouse and would not jeopardise the local housing choice within the area. The proposals therefore also pass part (ii) of policy DM2.

Finally, the proposed accommodation would be of a high standard, meeting the Council's HMO Licencing requirements, with good sized bedrooms and multiple spacious shared facilities. Outlook for each room is appropriate, and the property boasts a generous private rear garden that could be enjoyed by occupiers of the site.

The HMO SPD notes that a sandwiching arrangement is only unlikely to be consistent with policy, but in this instance, it can be shown to be in full compliance with the requirements of policy DM2, and as such the principle of development should be supported.

### *Residential Amenity*

The issue of noise and disturbance from the proposed use of the site as an HMO (for up to 8no. people) should be balanced against the existing use of the site as a smaller HMO (for up to 6no. people) and/or a single-household with no limit on size, which can occur under PDR as C3 and C4 are interchangeable. The additional occupiers of the site would have a negligible increase in associated residential activity in terms of comings and goings, within the context of this suburban location (83no. dwellings within a 100m radius of the site).

Moreover, the existing HMO is well managed, and now has several years of occupation to confirm this. The recent years of including the outbuilding as two bedrooms, plus sitting room, has proved to be a success and the Council's objections raised on this point during the two withdrawn applications (in 2021 and 2022) have turned out to be unfounded.

Whilst it is accepted that a common concern with regards to HMOs is an increase in noise and disturbance, any additional noise that may result from the increase in accommodation would not be unacceptable and would be residential in nature and character. Any issues of noise and/or anti-social behaviour, should they arise, can be dealt with through environmental protection legislation and the HMO Licencing regime.

Finally, the site affords significant space to store bins and recycling boxes (in accordance with published standards) and given the size of the property in respect of the proposed occupation; it is concluded that the proposals would ensure neighbouring residential amenity continues to be protected, whilst providing a good living environment for residents of the site.

### *Transport and Movement*

The site is very well located for access to frequent public transport and cycling/walking routes. Local facilities are also close to the site. Although the Council has no adopted parking standards for large HMO proposals, there are standards for small (C4) HMOs with minimum cycle parking requirements and maximum vehicle parking limits.

The existing six occupants of the HMO are served by 4no. car parking spaces and a cycle rack (covered, with locking points) within the rear garden – see appended photos. The application includes the provision of an additional cycle shed with a Sheffield bar, creating a further 2no. cycle parking spaces for the additional occupiers, ensuring appropriate parking levels for both the existing and proposed sharers.

In terms of appropriate car parking provision, the Nomis website includes a number of detailed characteristics tables based on the 2021 Census data. Of relevance is RM008 (Car or van availability by household composition). A data table extract of this is included on the following page.

This table shows that, whilst only 12% of single-family households within the ward have no car availability, for other households (which will include students and professional sharers in HMOs), this figure rises to 18%. This demonstrates that among other households, like HMO sharers, 1-in-5 households are unlikely to have access to a vehicle.

RM008 - Car or van availability by household composition			
ONS Crown Copyright Reserved [from Nomis on 10 December 2025]			
population	All households		
units	Households		
date	2021		
area type	2022 wards		
area name	Frome Vale		
Household composition	Total	No cars or vans in household	1 or more cars or vans in household
<b>Total</b>	<b>5,618</b>	<b>1,297</b>	<b>4,321</b>
<b>One-person household</b>	<b>1,764</b>	<b>777</b>	<b>987</b>
One-person household: Aged 66 years and over	811	444	367
One-person household: Other	953	333	620
<b>Single family household</b>	<b>2,745</b>	<b>322</b>	<b>2,423</b>
Single family household: Couple family household	2,122	146	1,976
Single family household: Lone parent household	623	176	447
<b>Other household types</b>	<b>1,109</b>	<b>198</b>	<b>911</b>

Above: Extract from Nomis dataset courtesy of <https://www.nomisweb.co.uk/>

The 4no. retained parking spaces would serve the converted property and there are existing parking controls within the area that would ensure that highway safety is maintained. As noted above, there are no adopted car parking standards for large HMOs. However, a 50% (of occupation) provision in this case would be appropriate given both the suburban location and its ready access to alternative modes of transport. Overall, the addition of two further occupants on the site would not amount to a significant highways impact to justify refusal, as required by within the context of paragraph 116 of the NPPF or the Local Plan.

For completeness, the existing refuse/recycling storage area, to the side of the house (see appended photos) is capable of hosting 2no. sets of receptacles issues from the Council. The Council's guidance on waste and recycling storage provision, for HMOs, requires 1no. set per 3no. occupants. Therefore, 2no. sets are required for both six and eight occupiers, and these are already provided.

#### *Other Matters*

As a change of use only, and a cycle store with a footprint of approximately 4sq.m (placed on an existing sealed surface), the application is exempt from mandatory biodiversity net gain (BNG). However, should the scheme have to deliver some biodiversity gain, then there is scope to incorporate bat/bird boxes on the property and/or consider a green roof for the cycle store, and these can be secured through planning conditions.

As well as a type of housing that makes a more efficient use of an existing developed site in an accessible location; the development would provide further minor economic benefits increased support for local facilities and services through additional residents and their associated patronage.

The scheme also provides a type of housing that is underrepresented within the immediate neighbourhood (only 1.5%), that is an affordable solution for single people and students who would otherwise struggle to rent as a single-person household. This is a further social benefit, adding to the choice of homes within the neighbourhood and providing a range of housing opportunities.

Moreover, as the Applicant has found, the offer of the HMO principally for student occupiers, not only is attractive given the site's proximity to USE Frenchay Campus, but also the two bedrooms within the outbuilding are highly sought after. The Applicant has found that student occupiers with neurodivergences are particularly in need of such accommodation – part of a shared household, but separated from the humdrum of the main house. Given the uniqueness of this, this should be considered a social benefit of moderate weight.

Given this social benefit, the economic benefits, and the environmental benefits of directing higher density development into suitable accessible area; the development contributes to each of the relevant objectives of sustainable development, which are at the heart of the local plan and NPPF.

### **Planning balance and conclusion**

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 (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 paragraph 11d of the NPPF thus engaged, the proposal offers social, environmental, and economic benefits through the provision of additional housing suitable for single person households, on previously developed land in a suitable location, which should be afforded



substantial weight, and in the context of the Council's current Housing Delivery and Land Supply issues, this should be given substantial weight.

The proposal would provide additional rooms to a high standard of accommodation without impacting on local amenity. Given this, and the above, it is hoped that the application can be supported.

The fee will be paid directly to the Planning Inspectorate. If you have any further queries, then please do not hesitate to contact us.

Yours faithfully,

**Stokes Morgan Planning Ltd**

**Encl.**

- (1) Site photos,**
- (2) Planning Enforcement Team correspondence (27<sup>th</sup> November 2023),**
- (3) HMO Assessment, and**
- (4) Appeal Decision ref. APP/Z0116/W/25/3360210 (29<sup>th</sup> July 2025).**

## Site Photos



Site frontage (1)



Site frontage (2)





Existing refuse/recycling store

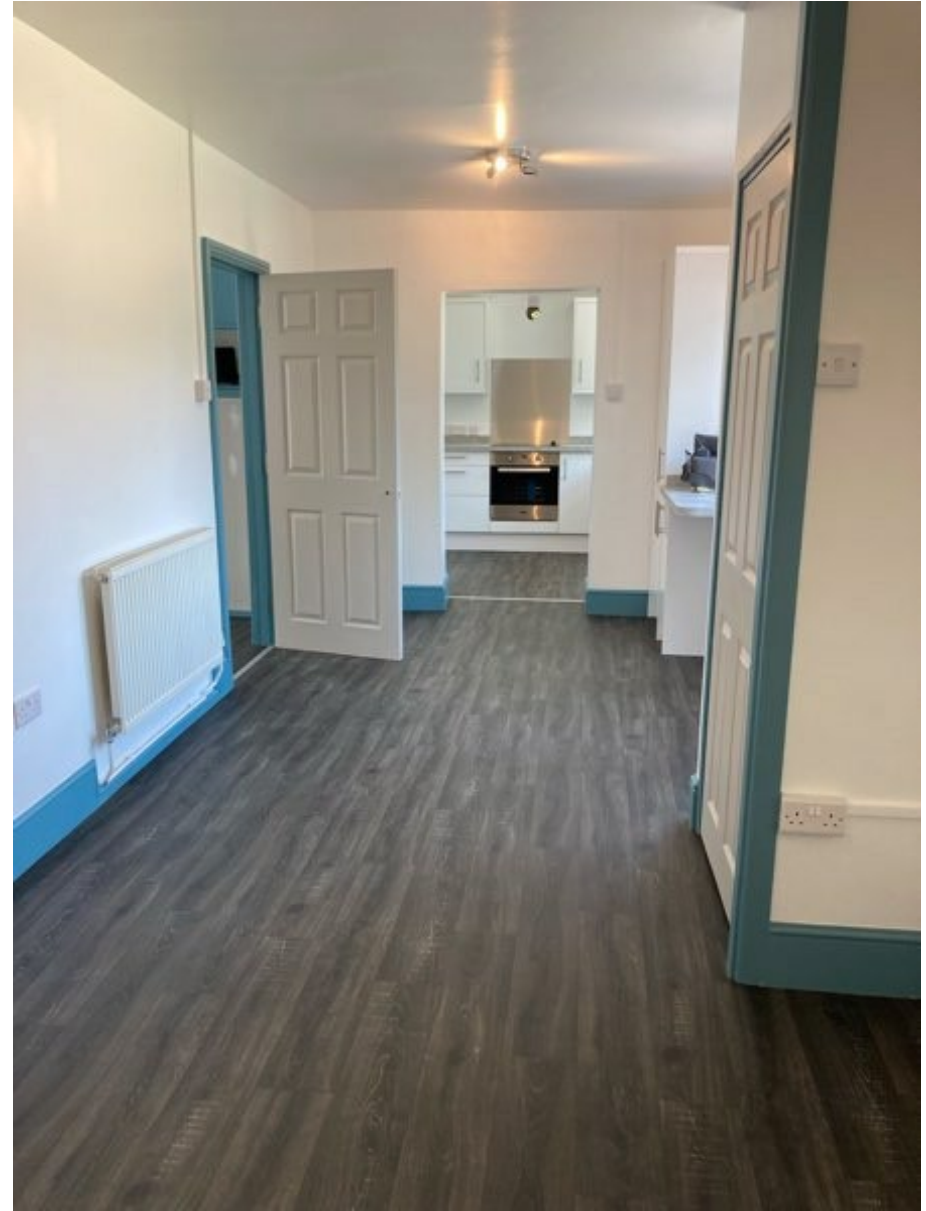


Posted 'house rules'





View into part of the living/dining area (main house)



View into part of the kitchen area (main house)





Existing outbuilding





Outbuilding (Nb: older photo – no door canopy)



Existing rear access and parking area





Existing cycle parking for existing occupants (proposed bike shed to be located adjacent (right) of this structure)



**From:** [Planning Enforcement](#)  
**To:** [lodgewayproperties](#); Kevin Morley  
**Subject:** BCC PEC ref no- 23/30426/HMO 33 Brockworth Crescent- Bristol - Case closed 27.11.23 to agent  
**Date:** 27 November 2023 11:04:22

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Dear Mr Morley,

**Planning Enforcement Reference:** 23/30426/HMO

**Address:** 33 Brockworth Crescent Bristol BS16 1HQ

**Alleged breach of planning control:** Use of detached garage building as a separate self contained dwelling unit and use of main house as a large HMO (amended 7.11.23)

We write in respect of the above case which we registered on 11.9.23 when concerns were raised with us.

We note that you wrote to the investigating officer [REDACTED] on 16.11.23 and you will see we have copied this email to your client David Holliday.

As you may be aware [REDACTED] carried out a detailed internal and external inspection of the whole property on 20.11.23 and in considering this investigation she also reviewed your clients previous planning applications that were withdrawn ( 21/01661/F and 22/03100/F)

The conclusion in this case is that we have not identified a breach of planning control so have closed this file.

We note that the garage building that has been converted to residential use has not been severed from the main property and is not being occupied or used independently from the main property. Furthermore - whilst extensive remodelling of the property has occurred the whole property (main house and former garage) are as you say in use as a single planning unit - a small hmo (Use class C4). Our position in this matter is that none of the physical works (internally or externally) either to the former garage building or the main dwelling required planning permission.

We advise that you ensure that your client is reminded of what would and would not represent a breach of planning control in terms of use and occupation.

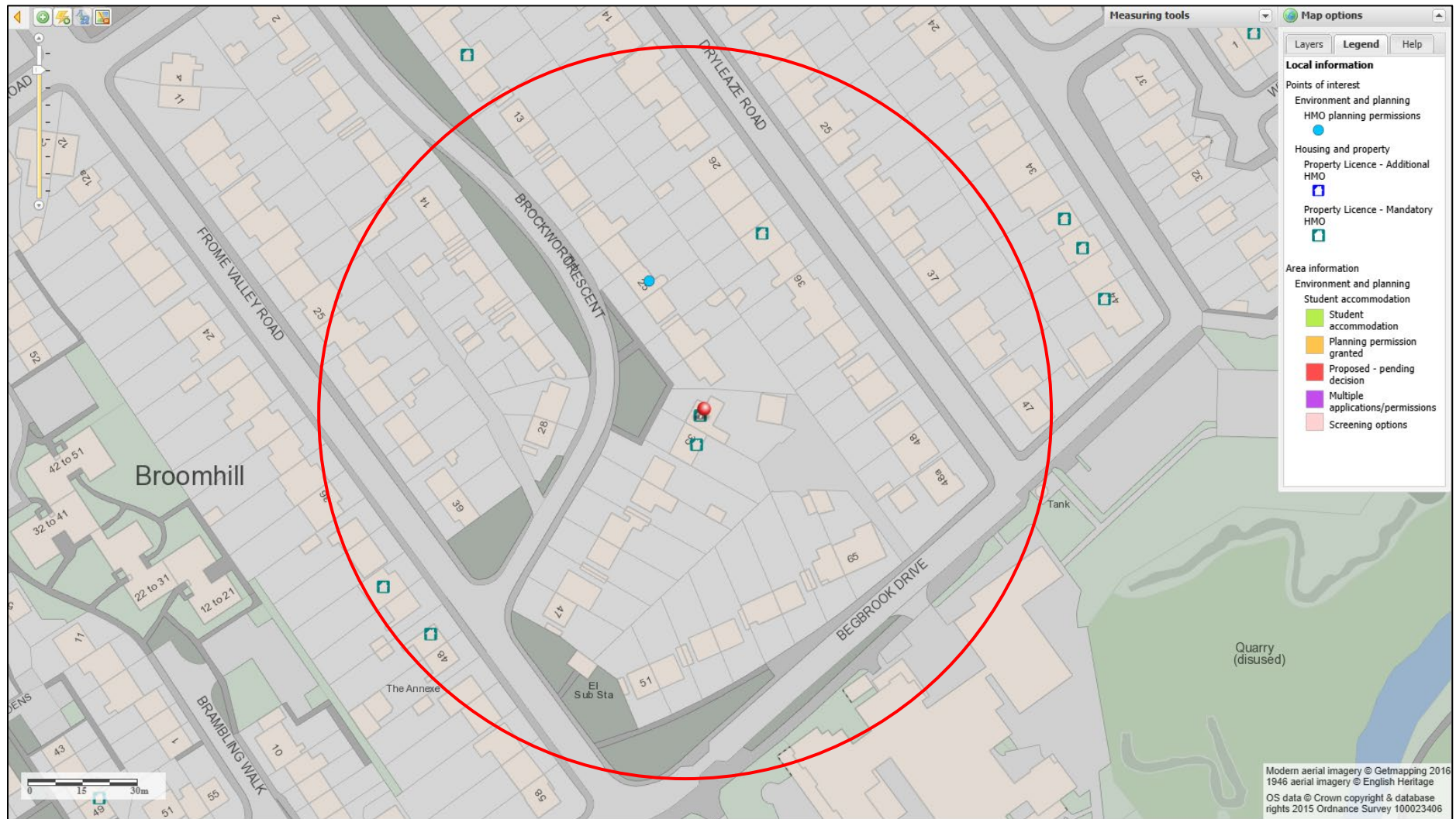
If in the future we receive allegations of unauthorised use we will register a new case and carry out robust assessments and take decisive action against any identified breaches of planning control we have copied this email to our private sector housing team who oversee hmo licencing.

Regards

Planning Enforcement Team (Development Management) [city hall]  
Bristol City Council  
P.O Box 3399  
100 Temple Street  
Bristol  
BS1 9NE

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## HMO Assessment (December 2025)



Map, Courtesy of Bristol Pinpoint Mapping, showing site (red pin) and registered HMOs (see map legend) and 100m radius from site (red circle)

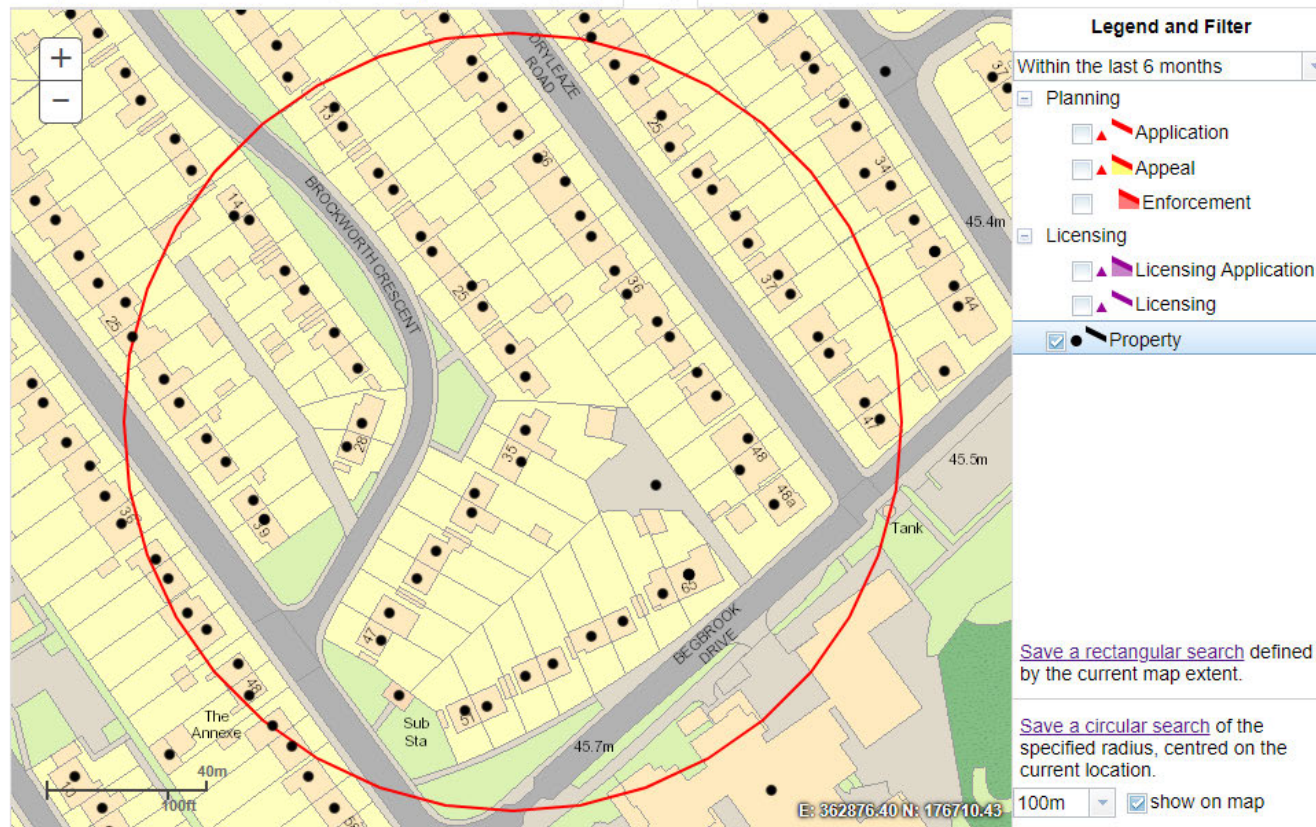


## Map Search

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Map, Courtesy of Planning Online Bristol, showing property points (black circles) and 100m radius from site (red circle)

**Dryleaze Road (Odds) – 14**

21 Dryleaze Road BS16 1HL  
 23 Dryleaze Road BS16 1HL  
 25 Dryleaze Road BS16 1HL  
 27 Dryleaze Road BS16 1HL  
 29 Dryleaze Road BS16 1HL  
 31 Dryleaze Road BS16 1HL  
 33 Dryleaze Road BS16 1HL  
 35 Dryleaze Road BS16 1HL  
 37 Dryleaze Road BS16 1HL  
 39 Dryleaze Road BS16 1HL  
 41 Dryleaze Road BS16 1HL  
 43 Dryleaze Road BS16 1HL  
 45 Dryleaze Road BS16 1HL  
 47 Dryleaze Road BS16 1HL

**Dryleaze Road (Evens) – 17**

18 Dryleaze Road BS16 1HL  
 20 Dryleaze Road BS16 1HL  
 22 Dryleaze Road BS16 1HL  
 24 Dryleaze Road BS16 1HL  
 26 Dryleaze Road BS16 1HL  
 28 Dryleaze Road BS16 1HL  
 30 Dryleaze Road BS16 1HL

**32 Dryleaze Road BS16 1HL - HMO**

34 Dryleaze Road BS16 1HL  
 36 Dryleaze Road BS16 1HL  
 38 Dryleaze Road BS16 1HL  
 40 Dryleaze Road BS16 1HL  
 42 Dryleaze Road BS16 1HL  
 44 Dryleaze Road BS16 1HL  
 46 Dryleaze Road BS16 1HL  
 48 Dryleaze Road BS16 1HL  
 48A Dryleaze Road BS16 1HL

**Brockworth Crescent (Odds) – 18**

13 Brockworth Crescent BS16 1HQ  
 15 Brockworth Crescent BS16 1HQ  
 17 Brockworth Crescent BS16 1HQ  
 19 Brockworth Crescent BS16 1HQ  
 21 Brockworth Crescent BS16 1HQ  
 23 Brockworth Crescent BS16 1HQ  
**25 Brockworth Crescent BS16 1HQ – HMO**

27 Brockworth Crescent BS16 1HQ  
 29 Brockworth Crescent BS16 1HQ  
 31 Brockworth Crescent BS16 1HQ  
**33 Brockworth Crescent BS16 1HQ – HMO**  
**35 Brockworth Crescent BS16 1HQ – HMO**

37 Brockworth Crescent BS16 1HQ  
 39 Brockworth Crescent BS16 1HQ  
 41 Brockworth Crescent BS16 1HQ  
 43 Brockworth Crescent BS16 1HQ  
 45 Brockworth Crescent BS16 1HQ  
 47 Brockworth Crescent BS16 1HQ

**Brockworth Crescent (Evens) – 8**

14 Brockworth Crescent BS16 1HQ  
 16 Brockworth Crescent BS16 1HQ  
 18 Brockworth Crescent BS16 1HQ  
 20 Brockworth Crescent BS16 1HQ  
 22 Brockworth Crescent BS16 1HQ  
 24 Brockworth Crescent BS16 1HQ  
 26 Brockworth Crescent BS16 1HQ  
 28 Brockworth Crescent BS16 1HQ

**Frome Valley Road (Odds) – 8**

27 Frome Valley Road BS16 1HF  
 29 Frome Valley Road BS16 1HF  
 31 Frome Valley Road BS16 1HF  
 33 Frome Valley Road BS16 1HF  
 35 Frome Valley Road BS16 1HF  
 37 Frome Valley Road BS16 1HF  
 39 Frome Valley Road BS16 1HF  
 39A Frome Valley Road BS16 1HF

**Frome Valley Road (Evens) – 7**

38 Frome Valley Road BS16 1HE  
 40 Frome Valley Road BS16 1HE  
**42 Frome Valley Road BS16 1HE – HMO**  
 44 Frome Valley Road BS16 1HE  
**46 Frome Valley Road BS16 1HE – HMO**  
 48 Frome Valley Road BS16 1HE  
 50 Frome Valley Road BS16 1HE

**Begbrook Drive Road (Odds) – 11**

51 Begbrook Drive BS16 1HG  
 53 Begbrook Drive BS16 1HG  
 55 Begbrook Drive BS16 1HG  
 57 Begbrook Drive BS16 1HG  
 59 Begbrook Drive BS16 1HG  
 61 Begbrook Drive BS16 1HG  
 63 Begbrook Drive BS16 1HG  
 Flat 1 65 Begbrook Drive BS16 1HG  
 Flat 2 65 Begbrook Drive BS16 1HG  
 Flat 3 65 Begbrook Drive BS16 1HG  
 Flat 4 65 Begbrook Drive BS16 1HG

**Total Properties: 83**

**Total HMOs (planning and/or licenced):**  
**6 (including application site)**

**Percentage of Neighbourhood properties**  
**as HMOs: 7%**



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## Appeal Decision

Site visit made on 27 May 2025

by [REDACTED] MPlan MRTPI

an Inspector appointed by the Secretary of State

Decision date: 29 July 2025

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**Appeal Ref: APP/Z0116/W/25/3360210**

**163 Wordsworth Road, Horfield, Bristol BS7 0EQ**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
  - The appeal is made by [REDACTED] against the decision of Bristol City Council.
  - The application Ref is 24/00990/F.
  - The development is the change of use from C3 dwelling house to C4 6 bedroom HMO.
- 

### Decision

1. The appeal is allowed and planning permission is granted for change of use from C3 dwelling house to C4 6 bedroom HMO at 163 Wordsworth Road, Horfield in accordance with the terms of the application Ref 24/00990/F and the plans submitted with it, subject to the following conditions:
  1. The development hereby permitted shall begin not later than 3 years from the date of this decision.
  2. The development hereby permitted shall be undertaken in accordance with the following approved drawings: 1806(L01, 1806 L02; 1806(L10, 1806 (L11), 1806 (L12), 1806(L13), 1806 (L14), 1806(L15), 1806(L16), 1806(L17), 1806(L20), 1806(L21), 1806(L22), 1806 (L23), 1806 (L24), 1806 (L25), 1806 (L26), 1806 (L27), 1806 (L28), 1806 (L29).
  3. No building or use hereby permitted shall be occupied or use commenced until the refuse store and area/facilities allocated for storing of recyclable materials has been completed in accordance with the approved plans. 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 building(s) 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.
  4. No building or use hereby permitted shall be occupied or the use commenced until the cycle parking provision shown on the approved plans has been completed, and thereafter, be kept free of obstruction and available for the parking of cycles only.



## **Preliminary Matters**

2. Evidence has been submitted with this appeal to demonstrate that following the refusal of planning application 24/00990/F, a Certificate of lawfulness for a proposed development was obtained for the erection of a side dormer roof extension at the appeal property (ref: 24/04656/CP). During my site visit I observed that the dormer roof extension has now been completed. This is considered to effectively resolve the Council's second reason for refusal. To make any further determination on the dormer window in this appeal decision would serve no planning purpose.

## **Main Issue**

3. The main issue is the effect that the proposal would have on the living conditions of the occupants of 165 and 167 Wordsworth Road, with regard to noise and disturbance.

## **Reasons**

4. 163 Wordsworth Road comprises the northernmost house of a small residential terrace of four dwellings. To the north of no.163, is a pair of semi-detached houses (no.s 165-167). The buildings are physically separated by a narrow driveway to the north of no. 163, a hedge / fence, and a narrow portion of side garden to the south of no.165. The separation distance between the two properties is broadly comparable to other separation distances locally.
5. No.s 165-167 are both dwellings, beyond them and forming part of further pair of semi-detached houses is no. 169. Both the Council and appellant have indicated that no. 169 is an HMO.
6. The proposal is for the change of use of no. 163 into a 6 bedroom HMO, which will result in no.s 165-167 being situated between two HMOs.
7. In determining the planning application, the Council have cited Policy DM2 of the Bristol City Site Allocations and Development Management Policies (SA&DM) Local Plan (2014). The supporting text of Policy DM2 acknowledges that the sub-division of existing accommodation and the supply of shared housing provide an important contribution to housing choice. Notwithstanding this, the policy aims to ensure that 'harmful concentrations do not arise'.
8. Policy DM2 is supported by the Council's adopted SPD, Managing the development of houses in multiple occupation (November 2020). The SPD provides guidance to identify situations where harmful HMO concentrations are likely to arise, including 'sandwiching' and whether more than 10% of dwellings are occupied as HMOs.
9. In assessing the proposal, the case officer concluded the proportion of HMOs within a 100m radius of the site would be 1.12%, and so significantly below the 10% threshold identified within the SPD. Nevertheless, the officer concluded that the proposal would have a harmful sandwiching effect on no.s 165-167 as a result of these dwellings being situated between two HMOs.
10. The proposal is indeed caught by the specific circumstances identified in para. 4.1 of the SPD which states that potential sandwiching situations include 'up to three single residential properties in a street located between two single HMO properties'. The guidance also states that 'sandwiching situations apply irrespective of limited breaks in building line'.

11. Although I attribute significant weight to the guidance within the SPD, there are other material considerations against which the proposals should be weighed. In this instance the nature of the use, the fallback position, the specific relationship between the properties and the concentration of HMO's within the local area more generally.
12. The proposal is for a 6 bedroom HMO falling under Use Class C4. C4 uses, which may have up to 6 unrelated residents are generally considered to have a levels of activity broadly compatible with existing residential uses. This is reflected in the fact that typically planning permission is not required for the change of use from Use Class C3 to C4. In this instance an Article 4 direction prevents permitted development rights being exercised.
13. Whilst there is the potential for a 6 bedroom HMO to have a greater level of noise, disturbance and activity than a 6 bedroom dwelling, I do not consider the difference would be harmfully significant. In this case the fallback position, being a 6 bedroom dwelling, has the potential to generate similar levels of activity.
14. In considering whether the concentration of proposed HMOs would be 'harmful', it is necessary to take into account the physical relationship and proximity between the HMO's and the dwellings. Notwithstanding the advice given in para. 4.1 of the SPD, the break in the building line, the resulting separation between the buildings, and associated boundary treatment would have a mitigating effect on disturbance originating from the HMOs. Furthermore, it is worth noting that each dwelling would only be exposed to an HMO on one side.
15. Finally, it has been demonstrated through the Council's own analysis that the general concentration of HMO's within the local area is very low, standing at 1.12%. No.169 is currently the only HMO within a 100 metre radius of the appeal property.
16. I consider that the cumulative effect of these mitigating factors would not result in an unacceptably harmful effect on the living conditions of the occupants of 165 and 167 Wordsworth Road, with regard to noise and disturbance.
17. Consequently, the proposal is considered to accord with Policies DM2 and DM29 of the Bristol SA&DM Local Plan (2014) in that the scheme would not result in a harmful concentration of HMOs and would achieve a high standard of design quality. It is also considered that the proposal would accord with Policy BCS18 of the Bristol Development Framework Core Strategy (June 2011) by contributing to a mix of housing tenures types and sizes.

### **Other Matters**

18. I note interested party comments about the potential effect of the proposal on car parking provision. As the rooms are single occupancy, and it is unlikely that not all residents will have cars, it is not considered that the demand for additional car parking will be significantly above that of a Class C3 dwelling with the same number of bedrooms. The provision of cycle parking will encourage the use of non car modes of transport. I also note that no concerns were raised by highways officers. Accordingly, I consider that the proposal would be acceptable in terms of highways impact.

## **Conditions**

19. The Council has suggested four conditions, a standard 3 year time limit and conformity with the submitted plans, and conditions relating to the provision and retention of cycle storage and refuse storage facilities.
20. I have reviewed these conditions and consider them necessary to achieve an acceptable development. A dedicated area for the storage of recyclable materials will help maintain good living conditions for residents and neighbouring properties. The provision of cycle parking will assist in encouraging the use of bicycles, potentially reducing the pressure on the local road network.

## **Conclusion**

21. For the reasons outlined above, and taking into account all other matters raised, I conclude that the appeal should be allowed subject to conditions.



INSPECTOR



Rev	Note	Date
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2m

@1:50

Prepared by Hawkland Ecological Construction  
44 King Street, Bristol  
BS15 1DH  
[redacted]@hawkland.co.uk

PROJECT	WORDSWORTH RD
DRAWING TITLE	LOCATION PLAN

SCALE @A4	1:1250
DRAWN BY	[redacted]

DATE	
REV	/

DRAWING NO.
1806(L01)