

Development Management
Bristol City Council
City Hall
PO Box 3176
Bristol BS3 9FS

Our ref: PR002001

Date: 4th April 2022

Sent via e-mail

Dear Sir/Madam,

Town and Country Planning Act 1990

327 Greystoke Avenue, Bristol BS10 6BD

The erection of a single-storey side extension, a hip-to-gable and rear dormer roof extension, and the change of use from a dwelling house (C3a) to a large house in multiple occupation (*sui generis*) for up to 8 people

I write on behalf of my client, Fenes Property Ltd, to apply for a change of use of 327 Greystoke Avenue (Use Class C3a) to a large house in multiple occupation (*sui generis*) for up to 8 people. As part of the works, it is proposed to erect a single-storey side extension, and a hip-to-gable and rear roof extension. I attach the following documents as part of this application:

- Application forms and certificates;
- Drawing no. 3959.PL 01 – site location plan;
- Drawing no. 3959.PL 02 – Rev. B existing and proposed site plans;
- Drawing no. 38959.PL 03 Rev. A – existing plans and elevations;
- Drawing no. 3883.PL 04 Rev. J – proposed plans and elevations;
- Energy statement.

Site and planning history

The application site comprises an end-terrace residential dwelling (C3a) at the junction of Greystoke Avenue with Pen Park Road. The site is enclosed by a hedgerow/shrub planting, with a large side and rear garden. There are a pair of out-buildings within the rear garden.

The property lies to the north of a cul-de-sac spur off Greystoke Avenue, and is separated from the main carriageway by a 30-metre-deep strip of public open space (designated as an 'Important open space') with tree planting. Pen Park Road lies to the northeast. The surrounding area is largely residential.

The site is in the Southmead ward of the city, and the Southmead East Lower Super Output Area (LSOA). The site is outside of the recently adopted North Bristol Article 4 areas (restricting permitted development rights from C3 to C4), is not within a Conservation Area, there are no Tree Preservation Orders, and no other policy designations apply.

There are inbound and outbound bus stops within a short distance (30-70 metres), to the north and south on Pen Park Road, with the 2 service operating every 15 minutes (Cribbs Causeway to Stockwood via city centre), the 76 service every 30 minutes (Henbury to Hengrove via the city centre) and the 13 service running hourly between the City Centre and Shirehampton. The Arnside district centre lies 480 metres to the southwest.

There is no planning history for the site, and other than the two outbuilding, no PD rights are understood to have been exercised. A certificate of lawfulness for a proposed hip-to-gable and rear roof extension, and a single storey rear extension, was recently issued by the Council (ref: 22/00342/CP).

Proposal

My client proposes the change of use of the existing C3 dwellinghouse to a large house in multiple occupation (*sui generis*) for up to 8 people. This is to be achieved through the erection of a single-storey side extension, and a hip-to-gable and rear roof extension.

The works to the roof have been designed to conform with Classes B and C of Part 1 of the GPDO, and would not exceed 40m² of additional roof volume, as confirmed through the recent certificate of lawfulness application.

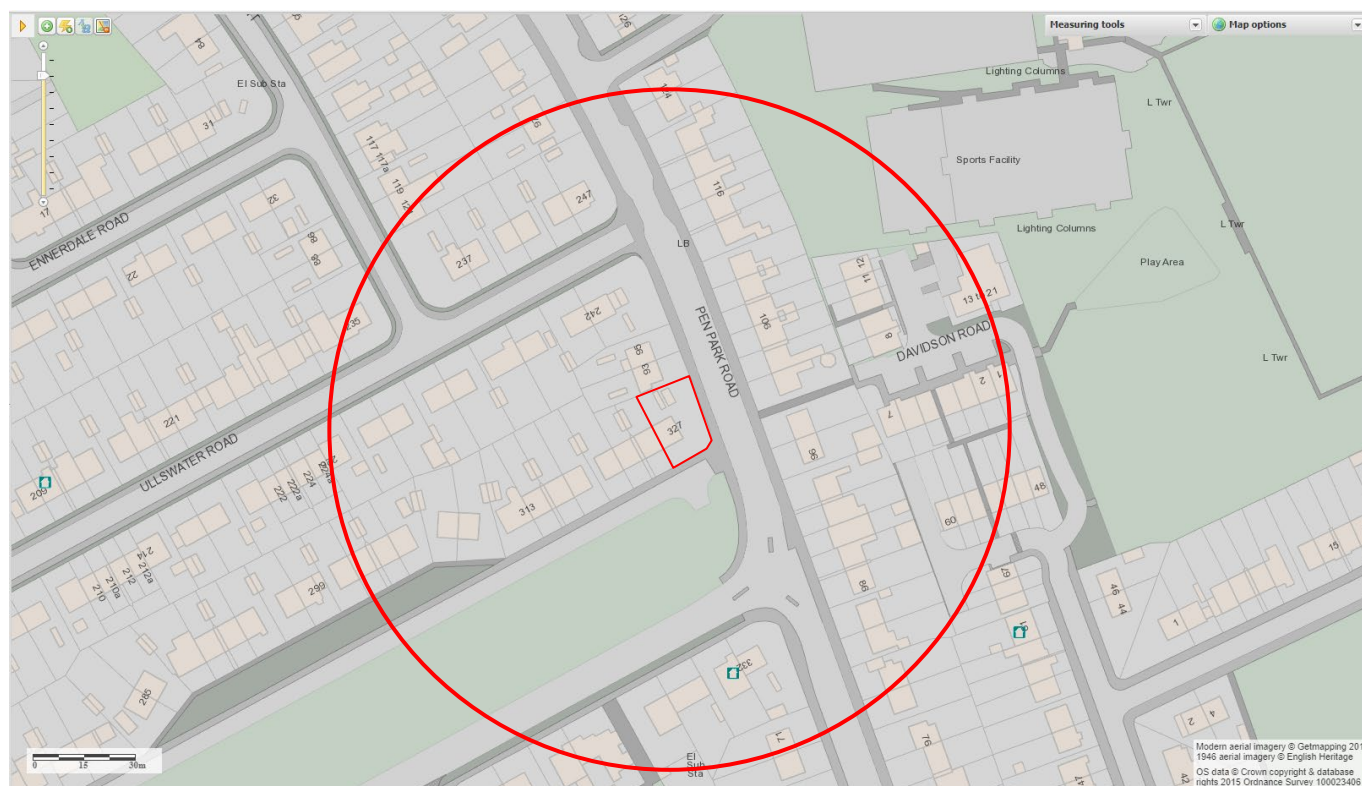
Internally, the eight bedrooms would each have a minimum floor area of 7.86sqm, exceeding the National Space Standard/HMO Licensing requirement minimum space standard for a single bedroom. For the avoidance of doubt, all rooms are proposed as single occupancy. The proposal includes a 24.01sqm lounge/kitchen/diner, and two bathrooms.

Externally, the existing outbuilding would be used for cycle storage, and a refuse store accommodating 1no. organic waste bin, 1no. cardboard sack, 2no 44 litre kerbside recycling boxes and 1no. 140 litre wheeled bin would be provided within the front 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. There is currently one HMO property in the vicinity (as can be seen from the extract from the Council's online mapping below), at 330 Greystoke Avenue (5 person). As such, the proposal would not result in a harmful imbalance within the vicinity.



Extract from Council's Pinpoint website, licenced HMOs indicated by green house symbol (red circle indicates 100m radius).

On the 3rd November 2020, the Council adopted the "Managing the development of houses in multiple occupation" Supplementary Planning Document.

The SPD identifies what constitutes a harmful concentration of HMOs. On a street level, this arises when an existing 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. With regards to the former, the SPD states that sandwiching can occur when, inter alia, there is a single HMO property in any two of the following locations: adjacent, opposite and to the rear of a single residential property. As can be seen from the map above, no sandwiching would occur.

With regards to the neighbourhood level, there is currently a single HMO within 100 metres of the site, out of 81 dwellings. The current proposal would increase the proportion of HMOs within the neighbourhood to 2.4%. Taken together, it is not considered that the proposal would result in a harmful concentration of HMOs at either street or neighbourhood level.

The SPD also identifies a Good Standard of Accommodation, and proposes to adopt the current standards for licensable HMO properties. These state that a single bedroom should measure no less than 6.51sqm; the proposed development exceeds this requirement for all rooms. 24sqm of communal living space is required for an 8no. person HMO, which the proposal exceeds.

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. In conclusion, the change of use would not give rise to significant harm to the amenity of neighbours.

With regards to residential amenity, the HMO would have a large side and rear garden. All the bedrooms would exceed the National Space Standards requirements for a single bedroom (7.5sqm). Large areas of shared facilities (living room, kitchen) are proposed.

The plans show that sound proofing will be provided to the Party Wall at both ground and at first floor level, to address noise transference.

Parking, cycle and refuse/recycling storage

The front garden would be utilised for refuse storage, with secure and covered cycle storage for 8no. bicycles within the existing outbuilding in the rear garden, in accordance with policy DM23. There is a single off-street parking space to the front, which would be retained. There is ample on-street parking available, and both Greystoke Avenue and Pen Park Road are free of Traffic Regulation Orders other than at junctions. There are no current parking standards for large HMO dwellings. However, this would not exceed the maximum parking standards for studio flats, which is considered a suitable comparison. The dwelling is also within easy walking distance of bus stops, offering regular services into Bristol City Centre, and a short distance from the Arnside District Centre.

Design

SPD2 advises that side extensions to terraced houses continue the building line of the terrace. With regards to extensions on corner plots, it is advised that established building lines to both the street frontage and side are respected, that interference with forward visibility at junctions is avoided, and that substantial highway verges and boundary treatments are taken into account with regards to any relaxation of these guidelines.



Application site (centre) in relation to Pen Park Road

The proposed side extension would be the full length of the dwelling, and extend out 3 metres. It would be less than half the width of the existing dwelling (6.21 metres). With regards to the Greystoke Avenue frontage, there would be no breaking of the building line. The Pen Park

Road frontage does not have a strong building line, with only a pair of semi-detached dwellings (22-24) between the site and the corner properties on Ullswater Road. Due to the slight curve to Pen Park Road, the houses to the north of Ullswater Road are forward of 93 and 95. 242 Ullswater Road has garages and outbuildings forward of the 93-95 Pen Park Road, as does the application, site. The application has a large side garden and as a result there would still be a 5-metre gap between the extension and the pavement, and there would be no impact on forward visibility as a result. Finally, due to the Open Space to the front of Greystoke Avenue, the site in effect benefits from a substantial verge which further reduces any perception of a building line with Pen Park Road.

In this context, the impact of a side extension on a corner plot is significantly reduced, and the site can comfortably accommodate the proposed side extension without compromising the character and appearance of the area.

The works to the roof would constitute permitted development (PD), and a similar hip-to-gable and rear dormer extensions have been erected at 247 Ullswater Road (also side on to Pen Park Road) under PD rights. The certificate of lawfulness issued by the Council is a material consideration, and this would be implemented (and the building used as a C4 small HMO) in any case.



Hip-to-gable and rear dormer extension at 247 Ullswater Road (application site circled)

Conclusion

As can be seen from the map of HMO properties earlier in this letter, the local area, for the main, comprises C3 residential dwellings, and HMOs are not prevalent within this part of Southmead.

The proposal would provide a high standard of accommodation and represent a valuable addition to the housing stock in a sustainable location, within walking distance of Southmead Hospital and Arnside District Centre.

The proposed roof extension could be carried out under PD Rights, as confirmed by the recent certificate of lawfulness, and similar works have taken place nearby. This is a strong material consideration. The side extension complies with the Council's guidance on extensions within SPD2.

If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

Stokes Morgan Planning Ltd