

South Gloucestershire Council
Planning Team
PO Box 2081
Bristol BS35 9BP

Our ref: 2CR

Date: 10th February 2024

Sent via e-mail

Dear Sir/Madam,

Town and Country Planning Act 1990

2 Coniston Road, Patchway BS34 5PA

Change of use of flats 3 and 4 from 6-bed/person small HMOs to 7-bed/person large HMOs

I write on behalf of my client Missiato Design and Build Ltd, to apply for the change of use of flats 3 and 4 at the above site, from small, to large houses in multiple occupation. The proposal is supported by the following plans and documents:

- Site location plan (produced via Planning Portal);
- Drawing no. 1710-P-100 – existing and proposed site and block plan;
- Drawing no. 1710-P-101 rev B – proposed plans and elevations;
- Drawing no. 1710-P-102 – existing plans and elevations.

The site lies to the northeast of Coniston Road, Patchway, to the north of the A38/B4057 roundabout. It comprises a recently constructed two-storey detached building (planning permission P22/06440/F), with 2no. 5-person HMOs at ground floor level, and 2no. 6-person HMOs at first and roof floor level. study rooms have been provided for the 6-person HMOs, within the roofspace.

The site is located within the ward of Patchway, and the North of Bristol Urban Fringe settlement boundary. The site is not within a conservation area and there are no Listed Buildings within the vicinity. The site falls within Flood Zone 1, there are no protected trees on the site, and no further policy designations apply.

Local Services and Amenities

The Patchway Town Centre lies 400 metres to the southwest, and there is a convenience store within 60 metres on the roundabout. Bus stops on Consiton Road (50 metres west), provide services every 15 minutes between Cribbs Causeway and Bristol City Centre, and the site is well located for the South

Gloucestershire Cycle Network, with shared surfaces on the roundabout linking to the A38 (Active Travel Route)

Proposal

My client proposes to convert the 2no. study rooms for flats 3 and 4 each to seventh bedrooms, to create 2no. large (7-person) houses in multiple occupation. No external changes are proposed. parking terms.

KEY ISSUES

Housing mix and the principle of HMO accommodation

The principle of HMO accommodation in this location has been established through the parent planning permission, with the current application solely seeking to convert 2no. study rooms to seventh bedrooms, creatin, in the process, 2no large HMOs.

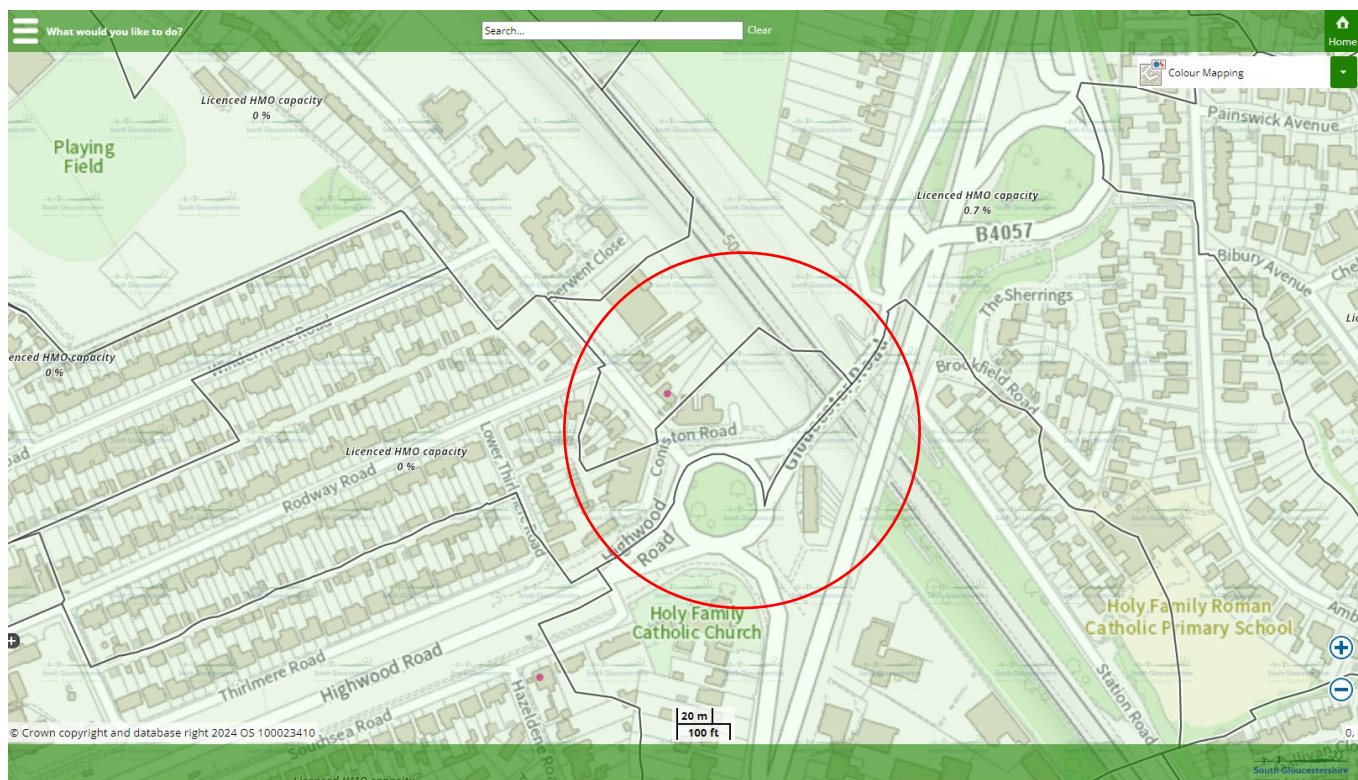
The Council's Supplementary Planning Document (SPD) for Houses in Multiple Occupation requires HMOs to provide a good standard of accommodation (ensuring compliance with HMO Licensing requirements), consider issues of noise disturbance (between adjoining communal rooms and bedrooms), and to support mixed and balanced communities.

The SPD recognises that HMOs meet a variety of needs for private rented housing, ranging from young professional 'house-shares' and students wanting to live off campus, as well as providing a vital source of housing supply for people on lower incomes. For many people, HMOs provide a practical and affordable housing option that meets their housing needs, whether that be as student accommodation, or for professional sharers.

The SPD includes two additional explanatory guidance notes. The first of these relates to sandwiching (defined as proposals for HMOs that sandwich a C3 residential dwelling between two HMOs, or the creation of 3 or more adjacent HMOs), and the harmful impact this may have on the amenity of neighbours. The second states that harm may result when an HMO change of use would result more than 10% of dwellings within the Census Output Area, or more than 20% of dwellings within a 100-metre radius, being HMO properties.

It should be noted that the SPD is silent on how the intensification of existing HMOs should be assessed, though an appeal at 42 Wades Road, Filton for the change of use from a 6-bed to a 7-bed HMO was refused due to the increased impact on the neighbouring property (and the resulting detrimental impact on residential amenity), which was sandwiched between two existing HMOs. Equally, an appeal decision at

12 Fifth Avenue, Filton, for the change of use from a small to a large HMO was allowed, despite the number of HMOs within the Census Output Area already exceeding 10%, with the Inspector noting that, *“Although this proposal would run counter to the threshold for the locality set out within the SPD, it is still necessary to demonstrate that the harm would be caused to the character and appearance of the area”*, and going on to conclude that no harm would ensue. These appeal decisions demonstrate that, with regards to intensification, if an existing residential dwelling is already sandwiched, or exceedance of the thresholds within the SPD has already occurred, it is still necessary to assess any harms resulting.



As the map above shows, there is currently only one HMO within 100 metres of the site, at 12 Coniston Road, whilst the two Census Output Areas that the site straddles are at 0% and 0.7% respectively in terms of existing HMOs. Whilst 10 Coniston Road would share a boundary with both no. 12 and the application site, given the orientation of the application site, with the entrance to the building sited 25 metres from the boundary at the front of the building, it is not anticipated that the additional comings and goings generated by the two additional bedrooms would have any discernible effect. The specifics of this site (as opposed to the 42 Wades Road appeal, which related to semi-detached pairs of neighbouring dwellings) are such that the intensification is not considered to result in a harmful sandwiching effect.

Amenity of neighbours

The judgement to be made in this instance is whether two additional occupants would impact on the amenity of neighbours in what is an existing residential area. Refuse storage has already been provided for, and so there would be no additional impact on visual amenity. Any additional noise that may result from the increase in accommodation would not be unacceptable, and issues of noise and anti-social behaviour, should they arise, can be dealt with through environmental protection legislation. In conclusion, the change of use to 2no. large HMOs would not give rise to significant harm to the amenity of neighbours.

Amenity space

The site benefits from a large (270sqm) communal garden, which equates to 11.25sqm per proposed occupant, in excess of the Council's 'rule-of-thumb' requirement of 5sqm per HMO occupant.

The two additional bedrooms proposed would measure 19.38sqm and 20.86sqm respectively (excluding en-suite facilities), exceeding both the 6.51sqm minimum licensing requirement for a single bedroom, and the 9sqm requirement for a combined living room and bedroom. In addition, 21.31sqm and 23.08sqm combined kitchen/lounges are in situ at first floor level. Licensing requirements for 7-person HMOs are 22sqm of combined kitchen/living room space; whilst flat 3 would not meet this requirement, as all bedrooms exceed the 9sqm required for a combined living room and bedroom, overall the flat would meet the licensing requirement.

Parking and highways

The site was approved with 13 parking spaces and 24 bicycle parking spaces. As such, no additional parking is required, the proposal meeting the policy requirement of one space per two bedrooms, with one space for visitors (in accordance with the policy requirement of 0.2 spaces per dwelling). Similarly, the 24 bicycle parking spaces also amounts to one space per person/bedroom.

Conclusion

The repurposing of the roof level study rooms to two additional bedrooms, in an area where HMOs are at a very low level, would not result in any conflict with policy, whilst also helping to meet the demand for rental accommodation for students and young people in the area, and reducing the pressure to convert C3 family dwellinghouses to HMOs. For these reasons, it is hoped that the Council can support the scheme.

Yours faithfully,

John Rooney